

Regeneration Of Crouchlands Farm  
Whole Farm Scheme

Planning Application Ref: 22/01735/FULEIA

Objections on Highways and Transport  
Grounds

Plaistow and Ifold Parish Council

April 2024



# 1 INTRODUCTION

1.1 SW Transport Planning Ltd is instructed by Plaistow and Ifold Parish Council to provide advice in connection with the proposed redevelopment of Crouchlands Farm, Rickman's Lane, Plaistow. These representations respond to the revised proposals for the "Whole Farm Plan" (WFP) planning application (Ref 22/01735/FULEIA), which seeks to provide office and light industrial uses within a rural enterprise centre; a cookery school; farm shop and glamping facilities.

1.2 The parish council submitted objections to the original planning application in October 2022, in a Technical Note titled "Review of Transport Impacts". This current "Objections on Highways and Transport Grounds" report responds to revised proposals and new transport information submitted by the applicant, including:

**Transport Assessment Addendum, dated 05 May 2023**

**Environmental Impact Assessment Report Addendum, dated 13 June 2023**

**Framework Travel Plan Addendum, dated 25 April 2023**

1.3 The applicant's covering letter accompanying the revised planning application proposals (DLBP letter 28 April 2023) summarises the key changes to the proposed development as follows.

**The removal of the proposed Equestrian Centre**

**The removal of the Special Events Area**

**The removal of weddings from Hardnip's Barn**

1.4 The following sections of this report contain a review of the new information within each of the documents listed above in paragraph 1.2 and sets out the Parish Council's outstanding areas of concern and grounds of objection.

1.5 It is noted that the WFP planning application, to which these objections relate, forms part of the wider redevelopment proposals for the farm which include the proposed Phase 1 and Phase 2 Rickman's Green Village (RGV) residential development, which are the subject of separate, current, planning applications by the same developer (Refs: 22/03114/FULEIA and 22/03131/OUTEIA). The three planning applications are interlinked and co-dependant on one another to achieve the applicant's stated sustainability objectives for the combined comprehensive redevelopment of the farm. The Parish Council has submitted separate representations in respect of both RGV planning applications, which should be read alongside these objections.

## 2 TRANSPORT ASSESSMENT ADDENDUM

### 2.1 Trip Generation

2.1.1 The original TA (May 2022) provides estimates of traffic generation for each of the following elements of the proposed development.

- Rural Enterprise Centre (Office and Light Industry)
- Farm shop and café
- Cookery school
- Glamping
- [Equestrian Centre – now removed]

2.1.2 The latest TA Addendum (TAA) presents the same trip generation data, without any changes apart from the removal of the Equestrian Centre. Our concerns about the robustness of the trip rates for the retained uses, as set out in our original October 2022 Technical Note, therefore remain. In short, where TRICS has been used, the selected sites are mainly edge of town industrial zones which are likely to have high levels of accessibility by walking, cycling and public transport and therefore not a good match for Crouchlands Farm. Where rates are derived from first principles, the underlying assumptions are not robust and appear low.

2.1.3 A primary concern is the lack of analysis of service vehicle traffic. The offices, industrial units, farm shop, café and glamping facilities will each generate lorries and vans associated with the delivery of supplies, the distribution of goods and removal of waste. The vehicle trip generation forecasts (Appendix H of the TA) allow for only 1 HGV movement per day at the 'offices' and 8 HGV movements per day for the 'industrial units'. These estimates appear low and unrealistic given the proposal for multiple small office and industrial units which will each generate a requirement for service vehicles. All of the other land uses are assumed, by the applicant, to generate zero HGV's.

2.1.4 No forecasts of LGV's (vans) have been provided. Given the nature and scale of the development, such vehicles would be a likely choice for the delivery of goods and materials. The assumption of zero LGV's means that no analysis of the impacts of these vehicles has been undertaken.

- 2.1.5 Having regard to the remote location of the site and the heavy reliance on Rickman's Lane and Foxbridge Lane as the primary access routes (see traffic distribution in Section 3) it is inevitable that these lanes will experience the greatest increases in service vehicle traffic, whilst being the least suited to accommodate such changes. The underestimation of HGV flows and failure to account for LGV's at all, means that the impacts of goods vehicles have not been properly evaluated.
- 2.1.6 Finally, in respect of trip generation, we note that trips associated with the re-use of Hardnip's Barn have not been clarified. This was an omission in the original TA but still has not been addressed in the TAA. There is conflicting information about the future use of this building. The covering letter from DLBP Ltd dated 28 April 2023 states that no weddings will take place and that the building will be used as a restaurant for the glamping business and as a space for workshops. Contrary to this, paragraph 4.1.6 of the TAA states that the building has the capability to host weddings and that these will be treated as infrequent special events.
- 2.1.7 The potential use of the building for weddings therefore needs clarification. Its use for other events such as birthday parties or hosting club events, as previously proposed, also needs to be confirmed. There is no indication if or how the restaurant use would be limited to glamping guests only or if it would also be open to the general public. Currently no estimates of traffic generation have been provided (or their impacts assessed). The potential use of the building as an events space or restaurant could have significant implications for traffic generation.

## 2.2 Trip Distribution

- 2.2.1 A new trip distribution methodology has now been adopted, based on Census data. This replaces the flawed original version and provides a more realistic assessment of trip origins/destinations and traffic routings.
- 2.2.2 The trip distribution analysis shows that the majority of traffic travelling to and from the site will be attracted to/from the east and south of the site, with a much smaller proportion to the west and north. This is evidenced from the tables and traffic flow diagrams in Appendix H of the TAA which show 84% of traffic arriving and departing to the east on Rickman's Lane, with 16% from the west. Of the 84% eastbound traffic, 65% travels via Foxbridge Lane for access to the B2133 at Vicarage Hill with the remaining 19% travelling via Kirdford.
- 2.2.3 The reliance on Foxbridge Lane as the key traffic route for the majority of site generated trips underlines the inherent locational disadvantage of the site. Foxbridge Lane is constrained narrow country lane and entirely unsuitable as the main traffic route for the development.

2.2.4 The limitations of the lane are well understood by WSCC. During roadworks, when temporary traffic diversions are set up (due to road closures for emergency road or utility works), Foxbridge Lane is deliberately excluded as a diversion route due to its poor highway standards and inability to accommodate increased traffic volumes.

### 2.3 Junction Capacity Assessments

2.3.1 Using the revised trip generation and traffic distribution assumptions, the TAA presents the results of capacity assessments for the site access point and nearby road junctions; based on a future assessment year of 2027.

2.3.2 The TAA clarifies that the proposed Foxbridge Golf Club development (Ref 22/02346/OUT) has been included in the analysis as a 'committed development' scheme, at the request of WSCC. However, the proposed Rickman's Green Village proposals are not accounted for in the junction modelling (or in the subsequent assessment of cumulative traffic impacts in the EIA addendum – discussed in Section 3 below). This means that the capacity assessments, as presented, represent the WFP proposals in isolation from the wider Crouchlands Farm development proposals; and should be interpreted accordingly.

2.3.3 A cumulative impact analysis is available in the documents submitted with the RGV Phase 1 and Phase 1 planning applications (Refs: 22/03114/FULEIA and 22/03131/OUTEIA). The parish council's objections to these planning applications are set out in the separate representations referenced in paragraph 1.5.

2.3.4 The junction capacity modelling results for the WFP scheme in isolation do not indicate any significant queues or delays at local junctions. However, this covers only one aspect of impact assessment. The implications for 'active travel' to and from the development and the effects of site generated traffic on existing vulnerable road users are not addressed in the TAA. These aspects of development impacts are considered later in these representations.

### 2.4 Proposed Mitigation Measures

2.4.1 The TAA refers to the package of traffic calming measures and passing places proposed in connection with the RGV proposals and offers to provide certain elements of the package if the WFP scheme comes forward in advance of RGV (if approved). These would include the passing places on Foxbridge Lane and the proposed short section of bridleway on Rickman's Lane to the east of the site access.

- 2.4.2 Our comments in respect of these measures are set out more fully in our representations on the RGV Phase 1 and Phase 2 planning applications but, in summary, the proposed short section of bridleway would not materially improve facilities for equestrians, nor would it offer any material benefits to pedestrian or cyclists. The passing places and associated traffic calming would offer no material benefits to road users but would have an unacceptable urbanising effect and harm the character of the area (the conclusion reached by the Inspector when refusing permission for the former biogas proposals at the site – Appeal Ref APP/P3800/W/3134445).
- 2.4.3 The only other mitigation offered is the provision of a Framework Travel Plan (FTP) to encourage sustainable travel choices. The FTP Addendum is discussed in Section 4 of this report.

### **3 ENVIRONMENTAL IMPACT ASSESSMENT REPORT ADDENDUM**

#### **3.1 Introduction**

- 3.1.1 The 'Traffic and Transport' chapter of the new Environmental Impact Assessment Report (EIAR) Addendum (June 2023) draws from and updates the findings in the 'Transport and Access' chapter in the original EIAR (May 2022). It utilises the same assessment methodology and significance criteria as the 2022 version but updates the analysis to reflect the changes to the scheme and the revised trip distribution assumptions.

#### **3.2 Traffic and Transport**

- 3.2.1 The assessment considers impacts associated with 'Severance', 'Pedestrian and Cycle Amenity', 'Highway Safety' and Driver Delay'. This differs slightly from the approach taken by the same developer in respect of the RGV Phase 1 and Phase 2 proposals which consider a broader range of topics including Severance; Driver and Pedestrian Delay; Non-Motorised User Amenity; Fear and Intimidation and Highway Safety.
- 3.2.2 It is normal practice for the authors of EIA reports to set their own scope, assessment thresholds and significance criteria. Whilst this establishes consistency within each individual document, it means that different approaches and different methodologies can be applied to different sites or by different practitioners – as is the case here.
- 3.2.3 An example of this is that the original EIAR for the WFP development (Table 8-5) defines Rickman's Lane as 'High' sensitivity whereas the Environmental Statement Addendum for the RGV applications (Table 3-16) defines Rickman's Lane south as 'Low' sensitivity and Rickman's Lane north as 'Medium' sensitivity.

- 3.2.4 This illustrates the highly subjective nature of the process where the conclusions of the report represent the individual authors opinions; and where many alternative interpretations of the results are possible.
- 3.2.5 The main area of concern for the Parish Council is the adverse impact of development traffic on the routes likely to experience the greatest net change in traffic conditions (in terms of overall vehicle flows and goods vehicles). The following comments therefore primarily relate to Rickman's Lane and Foxbridge Lane. However, this does not mean that the Parish Council considers the impacts elsewhere on the network to be acceptable.
- 3.2.6 Table 3-3 of the EIAR Addendum shows that Rickman's Lane will experience a 94% increase in traffic flows, with an 85% increase in HGV's. The corresponding figures for Foxbridge Lane are a 46% increase in overall traffic, with a 42% increase in HGV's. These are very significant increases, particularly considering the sensitivity of these routes. It should however be noted that these percentage changes are calculated from a future baseline scenario which includes traffic from the proposed leisure development at the Foxbridge Golf Club site. Whilst the Golf Club proposals are a material consideration, the presentation of the changes in traffic flows is distorted due to the baseline flows being elevated. The net changes relative to current baseline conditions (excluding the Golf Club) would be significantly greater than presented.
- 3.2.7 A further concern is that these two key routes are assessed by the applicant as only experiencing 'Minor' or 'Negligible' impacts (Table 3-4). This is despite Rickman's Lane being regarded, by the applicant, as 'High' sensitivity and Foxbridge lane as 'Low' sensitivity.
- 3.2.8 Given the quite rural nature of these lanes, the presence of residential properties fronting the highway, the presence of the scout hut and the lack of facilities for non-motorised road users, we consider both of these routes to be of 'High' Sensitivity' and likely to experience 'Major' adverse impacts, due to the underestimation of trip generation, failure to account for service vehicles and failure to properly consider cumulative impacts (including RGV).
- 3.2.9 In view of the shortcomings identified above, the results of the EIAR Addendum are unrealistic, over optimistic and unreliable and should be afforded little weight.

## 4 FRAMEWORK TRAVEL PLAN ADDENDUM

### 4.1 Original Framework Travel Plan (May 2022)

- 4.1.1 The original FTP outlined a strategy for promoting sustainable travel to and from the site, with emphasis on reducing the number of single occupancy car journeys. The aim being to encourage car sharing and maximise active travel, whilst recognising the practical limitations of the site's location, the very low level of public transport access and limited opportunities for walking and cycling. Using standard Travel Plan techniques this was to be achieved through promotional material to advertise facilities within walking and cycling distance and the provision of maps and journey planning websites. Car sharing is to be encouraged by advertising car sharing websites and the provision of dedicated car sharing parking spaces on site.
- 4.1.2 The FTP also proposes a minibus to facilitate group travel to the site from establishments like local schools and care homes, but makes clear the minibus would not be available as a regular or timetabled shuttle service for staff.
- 4.1.3 Whilst Travel Plans are a standard requirement for all major new developments, their ability to alter travel patterns is directly governed by the scope, at the site in question, for alternatives to car-based travel. For example, there must be a range of viable, convenient and attractive alternative travel options available to employees to achieve any meaningful modal shift.
- 4.1.4 Such options are extremely limited in this case, making it unlikely that any material reduction in car-borne traffic would be possible. This point was recognised in WSCC's consultation response of 9 September 2022, which questioned the effectiveness of the FTP proposals, requesting stronger measures to be included and evidence to show how the development could meet the sustainable transport requirements of the NPPF.
- 4.1.5 The FTP Addendum (April 2023), represents the applicant's response to these concerns and is discussed below.

### 4.2 Framework Travel Plan Addendum (April 2023)

- 4.2.1 A side-by-side comparison of the two FTP documents shows that the changes are minimal. Only one new travel plan measure has been added, as follows.
- *Personalised Travel Planning for employees specific to their shift pattern and job type*



- 4.2.2 This is a standard feature of most travel plans and means that the Travel Plan Coordinator, if asked, will provide personal advice about the travel options available and guide the individual to sources of information relative to their journeys. It cannot, of course, make more travel options available or force the individual to adopt any particular travel mode. This small change to the FTP would have no material impact on the overall performance of the Plan.
- 4.2.3 With regard to public transport, the FTA Addendum now includes a reference to the proposed fare-free shuttle bus service being promoted as part of the separate RGV planning application proposals. This service is linked to a separate planning application which may or may not come forward, so cannot be relied upon to improve the sustainability credentials of WFP proposals.
- 4.2.4 The only other change to the document is the inclusion of a new section titled "Efficacy of Travel Plan Measures". This refers to various Department for Transport research and guidance documents relating to travel planning. The documents date from 2002 to 2010 and therefore predate the more recent changes to personal travel that have emerged in recent years due to home working and online shopping trends. Reference is made to modal shift results achieved at three "Sustainable Travel Towns" (Worcester, Darlington and Peterborough) in the period from 2004 to 2009. Notwithstanding the age of the research, no meaningful comparisons can be drawn between the 'towns' used in the study, with high density development and established public transport, walking and cycling networks; and the rural farm location of the current proposals.
- 4.2.5 In this case, the scope for any material modal shift is highly limited due to the location of the development and the absence of convenient and attractive alternative travel options. The changes presented in the FTP Addendum are therefore wholly insufficient to overcome the constraints to sustainable travel that exist at the site.

## 5 TRANSPORT SUSTAINABILITY

- 5.1 The site sits in an isolated rural location remote from population centres and local facilities. It is also detached from the strategic road network and public transport services and is reliant on narrow country lanes for access.
- 5.2 The applicant argues that the site is accessible by walking and cycling, using existing Public Rights of Way (PROW) and the lanes serving the site. However, there are no footways, cycle lanes or lighting on the local road network and the PROWs in this area are indirect, unsurfaced and unlit. These factors together with the large distances to surrounding population centres mean that walking and cycling is unlikely to be attractive to future employees or visitors to the development.

5.3 The DfT's Local Transport Note (LTN) 1/20 provides guidance on the design of cycle infrastructure to encourage cycling but its core principles also apply to walking. The five core design principles from LTN 1/20 are reproduced below.

**LTN 1/20 Figure 1.1 – Core Design Principles**

| Accessibility for all  |   |  |   |   |
|--|---|--|---|---|
| Coherent   | Direct  | Safe   | Comfortable   | Attractive  |
|   |    |   |   |    |
| <b>DO</b> Cycle networks should be planned and designed to allow people to reach their day to day destinations easily, along routes that connect, are simple to navigate and are of a consistently high quality. | <b>DO</b> Cycle routes should be at least as direct – and preferably more direct – than those available for private motor vehicles. | <b>DO</b> Not only must cycle infrastructure be safe, it should also be perceived to be safe so that more people feel able to cycle. | <b>DO</b> Comfortable conditions for cycling require routes with good quality, well-maintained smooth surfaces, adequate width for the volume of users, minimal stopping and starting and avoiding steep gradients. | <b>DO</b> Cycle infrastructure should help to deliver public spaces that are well designed and finished in attractive materials and be places that people want to spend time using. |

5.4 When considering **coherence**, it is clear that the LTN 1/20 objective to “allow people to reach their day to day destinations easily, along routes that connect, are simple to navigate and are of consistently high standard” cannot be met in this case.

5.4.1 With regard to **directness**, it is clear there are no direct cycle routes to and from the site. The core objective that cycle routes should be “at least as direct – and preferably more direct – than those for private motor vehicles” cannot be met in this case.

5.4.2 With regard to **safety**, there are no footways or cycleways in the area and for cyclists using local roads there is no segregation from motor vehicles, meaning that cyclists are exposed to passing traffic making cycling unattractive to all but the most confident of riders.

5.4.3 In terms of **comfort**, LTN 1/20's Cycling Level of Service Tool states that “cyclists should be able to comfortably cycle without risk of conflict with other users”. The absence of any segregation between cyclists and vehicles means that this objective cannot be met.

- 5.4.4 With regard to **attractiveness**, LTN 1/20 notes that routes should be "*appealing and be perceived as safe and usable*", identifying that '*lighting*' and '*isolation*', are key indicators. It advises that "*well used, well maintained, lit, overlooked routes are more attractive and therefore more likely to be used*". The cycle routes servicing the site do not come close to achieving these objectives and will continue to be unattractive to cyclists.
- 5.5 With regard to public transport accessibility, there are no viable options for meeting the daily travel needs of employees and visitors to the site. The applicant argues that the proposed shuttle bus service being promoted as part of the separate RGV planning application proposals would be capable of serving the development. However, as noted earlier, this service may or may not come forward or remain in place after the subsidy period expires, so cannot be relied upon to serve the WFP proposals.

## 6 CONCLUSIONS

- 6.1 The applicant's analysis confirms that Rickman's Lane and Foxbridge Lane will be the primary access routes serving the development. With 84% of traffic using Rickman's Lane and 65% using Foxbridge Lane. These routes are constrained narrow country lanes that are entirely unsuitable as the main traffic routes for the development.
- 6.2 The applicant's assessment of traffic impacts is based on unrealistic and optimistic trip generation rates. In particular, HGV forecasts are incomplete and no assessment of LGV's has been provided. These vehicle types have a disproportionate impact in terms of perceptions of safety and amenity for vulnerable road users. As a consequence of this, and the questionable assessment criteria adopted by the applicant; the resulting analysis of impacts within the Transport Assessment Addendum (TAA) and Environmental Impact Assessment Report Addendum (EIAR Addendum) are unreliable, overly optimistic and do not properly reflect the likely impacts of the development.
- 6.3 The proposed traffic calming and passing places on Foxbridge Lane would not offer any material benefits to pedestrians or cyclists but would have an unacceptable urbanising effect and harm the character of the area. Such proposals were rejected on these grounds in relation to the failed biogas proposals at the site (Appeal Ref APP/P3800/W/3134445).
- 6.4 In conclusion, the proposals for the Crouchlands Farm WFP would result in an isolated, car-dependant, development, remote from population centres, local services and with inadequate public transport provision. The proposal is therefore contrary to national and local transport sustainability policy objectives and should be refused.