Developments Affecting Trunk Roads and Special Roads
Highways England Response & Formal Recommendation to an Application for Planning Permission

From: Divisional Director, Network Delivery and Development, South West Region, Highways England.

To: Mr Andrew Martin, West Dorset District Council

CC: transportplanning@dft.gsi.gov.uk
growthandplanning@highwaysengland.co.uk

Council's Reference: WD/D/15/002010

Referring to the notification of a planning application(s) referenced above, in connection with the A35(T) - Outline application for the development of up to 760 dwellings, 60 unit care home (Use Class C2), 4 hectares of land for employment (Use Classes B1, B2, B8), mixed use local centre (Use Classes A1, A2, A3, A4, A5, B1, C3 and D1), primary school and associated playing fields (Use Class D1), areas of public open space and allotments, drainage works, and the formation of two new accesses to West Road. (Outline) on land at Vearse Farm, Bridport notice is hereby given that Highways England's formal recommendation is that we:

a) offer no objection;

b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A — Highways England recommended Planning Conditions);

c) recommend that planning permission not be granted for a specified period (see Annex A – non determination);

d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).

Re Highways Act Section 175B: (Please delete as appropriate)

a) Highways England consents to access for any new connections to the Strategic Road Network as part of this application:

b) Highways England does not consent to access for any new connections to the Strategic Road Network as part of this application

c) Not relevant as there is no common boundary between the planning site and the SRN.

d) Not relevant as no new access is being proposed along the common boundary between the planning site and the SRN.
* Where we give consent (a), under Section 175B, this is applicable only to the particular planning application and its accompanying documents, including agreed junction designs.

This represents Highways England formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you must consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2015, via transportplanning@dft.gsi.gov.uk.

**Signed by**

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Highways England: Ash House. Falcon Road, Sowton Ind Estate, Exeter, EX2 7LB
Annex A  Highways England recommended non-determination

HIGHWAYS ENGLAND ("we") has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations with regard to planning application reference WD/D/15/002010 and has been prepared by Steve Hellier of the Network Delivery and Development Growth and Improvement Team and Asset Manager for the SRN in West Dorset.

We have undertaken a review of the relevant documents supporting the planning application to ensure compliance with the current requirements as detailed in DTF Circular 02/2013 “The Strategic Road Network and the Delivery of Sustainable Development “ and the DCLG National Planning Policy Framework (NPPF).

Statement of Reasons

Highways England provided comments on a draft version of the Transport Assessment (TA) which supports this application during April 2015. Our review of the initial draft found that:

- a predicted opening year of 2015 was overly ambitious;
- sections on Local and National Policy were generic and did not relate policies to this specific development;
- there were numerous errors in the description of the existing transport conditions along the SRN;
- physical limitations on active travel modes limit any reductions that can be applied for a shift towards these modes;
- a pattern of collisions involving vulnerable users had not been addressed despite the development increasing their number;
- there did not appear to be a firm commitment from local bus operators to provide an enhanced service following development;
- sections of the Development Impact Assessment appeared generic and referred to developments other than Vearse Farm;
- further detail was required in the Travel Plan to enable us to agree the predicted trip rate reductions;
- in view of the importance of the SRN in this area in serving the significant tourist and recreational demand further information was required on the timing of traffic surveys;
- insufficient evidence was provided to support the conclusion that traffic growth along the SRN would be negligible;
- there were unexplained variations in employment land area when considering the number of trips generated by this element;
- little evidence was provided to support assumptions made regarding trip internalisation;
- in order to support reductions in vehicle trips arising as a consequence of assumed use of public transport and sustainable modes we require a confirmed
public transport strategy and enhanced walking and cycling links between the site and local amenities;
- percentages shown on the trip distribution and assignment diagrams did not total 100 suggesting some traffic is missing from the subsequent analysis;
- insufficient information was provided in support of capacity modelling of the SRN junctions;
- we disagreed with the TA’s assertion that a roundabout junction at Miles Cross could not be justified on safety grounds; and
- the TA did not consider the committed signalised access junction to the new Waste Recycling Centre between Miles Cross and Crown Roundabout.

Application TA Review

Our review of the TA supporting the application has found the following issues which will need addressing prior to a positive recommendation from Highways England.

There is very limited demonstration in the document, despite the recommendation of the pre-application advice, to show how the development transport proposals are aligned with national and local policy. Whilst the TA covers the pertinent policies, noting the current status of the West Dorset and Weymouth and Portland Local Plan, there is only one reference to the development itself. The applicant needs to evidence how the application would contribute towards national and local policy objectives particularly in the general areas of reducing the total number of vehicle trips and facilitating sustainable journeys. The policy section also needs to assess where there would be constraints in meeting the objectives, for example such as severance, how they would approach in overcoming some of these matters, for example, the TA will be underpinned by a walking and cycling strategy.

When assessing public transport at the site the TA suggests that as a bus stop is located along the B3162 the site complies with the 400m walking distance to a bus stop. However it would appear the standard has been misinterpreted. The actual requirement to ensure an attractive service is that each dwelling has a bus stop within 400m. However we note that both the bus service and pedestrian and cycle facilities are to be enhanced by the development.

The TA uses five years' collision data up to February 2015 and highlights three clusters of collisions along the SRN, at Miles Cross, Crown Roundabout and East Road Roundabout. As we mentioned at the scoping stage, given the increases in trips which will pass through these junctions we do not believe that safety issues can be dismissed. At Miles Cross a significant proportion of collisions involved right turning vehicles, hence Highways England opinion that this junction become a roundabout. At Crown and East Road roundabouts a PIA rate of 2.0 per year is above the average expected at these types of junction as set out in table 2/1 of DMRB TD 16/07. Therefore we cannot agree that these levels of collisions are “not unexpected at a busy A road junction”, they are in fact above the expected rate. Highways England cannot permit traffic increases due development without a deeper investigation as to the causes of these collisions and mitigation where appropriate.

We note that the TA suggests four options for improving the existing bus services that pass the site. Of the suggestions we support an increase in frequency of services to 30 minutes while diverting through the site to ensure each dwelling is approximately 400m from a bus stop. However as noted during scoping we require a commitment to providing such a service from an operator prior to recommending approval to ensure this mode is available to future residents and that no undue pressure is placed on the SRN.
We note that the accessibility assessment of the site, although illustrating that numerous facilities are within convenient reach, does not discuss the quality of the active travel infrastructure. For example the indicative masterplan seems to suggest that a link to the footway to the west of Magdalen Lane will be provided, although this is not discussed in detail within the TA. Without further information on active travel modes it is difficult to assess the likelihood, or otherwise, that future residents will travel actively. Should they not do so the number of vehicle trips from the site will increase thus increasing pressure on the SRN. Again this was raised during TA scoping.

With such uncertainty regarding public transport provision and facilities for active travel, it is difficult to have confidence in the Travel Plan submitted with the application.

Traffic surveys used to inform the impact analysis are over four years old, having been undertaken in July 2011. The TA suggests that the evidence indicates that traffic growth, since the time of the surveys, has been negligible and that growth rates of 1.009 and 1.015 are appropriate to 2017. However the TA does not provide any background information on the 2013 ATC data to ensure it is comparable with the 2011 survey. Also rather than showing minimal growth, figure 8d of the TA indicates a 2% growth in traffic in the three years between 2011 and 2014. Other Highways England permanent count sites along the A35 near Bridport also show this trend. Therefore, the suggestion that there will be less than 1% and 1.5% growth in the AM and PM peaks respectively over the six year period to 2017 seems unrealistic.

During scoping it was agreed that an analysis year of three years post submission, therefore 2018, would be appropriate. We are surprised therefore that the analysis focuses on a future year of 2017. This needs to be corrected.

While a 15% reduction to account for trip internalisation appears acceptable we cannot support a further reduction of 5% for travel by sustainable modes. This is because, as stated previously, there is no confirmation of financial commitment to support a bus service, and a lack active travel infrastructure.

Although the TA states in includes the proposed Housing Waste Recycling Centre (HWRC) as a committed development it has not been fully considered. For example, the proposed signalised access to the HWRC has neither been discussed nor assessed.

We note that the TA provides an analysis suggesting that Miles Cross junction will operate satisfactorily during the future year. However, HE has been consistently clear that, due to safety concerns and the projected increase in right turning traffic (an increase of between 2.5 and 3 times) we require this junction be converted to a roundabout. While the TA provides a design for such a junction the layout has not been tested to ensure it provides sufficient capacity. Depending on the results of such analysis changes to the design may be required.

Unfortunately we cannot comment on the results of capacity analysis of other junctions along the SRN as model outputs have not been provided.

Also, in line with paragraph 2.58 of the new standards on Road Safety Audit, HD 19/15, we require "A Stage 1 Road Safety Audit (or combined Stage 1 & 2 Road Safety Audit where there has been no preliminary design) must be undertaken before planning consent is applied for". Therefore a Road Safety Audit compliant with HD19/15 should be submitted for all improvement/mitigation schemes on the SRN. We will also require an NMU audit in line with HD42/05. As designs progress through detail design a Safety Risk Assessment using GD 04/12 will also be required.
Application Travel Plan Review
The travel plan provided appears very much a framework document and is very generic in parts. It does not contain any specific measure which will be enacted with the development and provides only one target, to “ensure a modal shift of 10% or more”. We would expect a plan to contain further information in regard to the measures the development will put in place to promote sustainable travel. These should include details of any enhancements and any examples of welcome packs that will be provided,

Recommendation:

West Dorset District Council shall not grant planning permission for the development proposals (LPA reference: WD/D/15/002010) for a period of 6 months from the date of this recommendation to provide sufficient time for the applicant to submit further information on the development's impact on the A35(T)