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Mr M Hayden
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Temple Quay House
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26th February 2018

Dear Sir

Rugby Local Plan Examination in Public.

Warwickshire County Council, in its capacity as Highway Authority, has been asked to provide a response in relation to the first three matters which have been raised by correspondence from local residents, and are provided in the following text.

1. Estimated Traffic Projection Figures

Question:

The estimated traffic projection figures cited in the SAVE Dunchurch email to the Inspector of 31/1/2018 were prepared by Colin Reeves who attended the public examination and used the same figures in Day 7's proceedings. They focus on the A45 / A4429 / M45 junction but by direct implication raise uncertainty about the strategic and local traffic impacts by the introduction of the South West Spine road or not and the DB Symmetry application. They are based on publically available DfT figures for that junction along with projections based on traffic counts carried out by the SARD (Stop the Ashlawn Road Development) in / around Dunchurch 2016.

Response:

The Highway Authority has reviewed the information which has been submitted, by SAVE Dunchurch regarding the traffic flow, with a focus on the A45 / B4429 / M45 Junction. The data has been obtained from DfT. The data which has been referred to as the base traffic flow at this junction is based in part on aggregate estimates of Annual Average Daily Traffic Flows on the A45 / M45, which is managed by Highways England, no such data has been provided for the A4429 which is Warwickshire County Councils responsibility.

*Working for
Warwickshire*

In addition, the DfT data is a link count rather than a turn count, with the traffic flow being estimated every year since 2013. The DfT projections simply infer that traffic will continue to grow. In 2008 for example, DfT assumed that the Annual Average Daily Traffic Flow on the A45 would be 26,236 vehicles. However, an actual count undertaken by DfT one year later recorded the traffic flow as 22,797, a negative difference of 3,439 vehicles. Therefore caution must be applied when utilising the DfT projection of 25,999 vehicles in 2016 since the last actually observed count was in 2013 (23,508 vehicles), and is now approaching 5 years old. Once a traffic count is over 5 years old it cannot normally be considered reliable under Planning Guidance for assessing transport impacts.

The reliability of this data is therefore questionable as, in order for traffic movements at the A45 / B4429 / M45 junction to be understood, a full classified turning movement count should be undertaken. This type of count was undertaken in 2016 by Warwickshire County Council as part of the development of the updated Rugby Wide Area Strategic Transport Model.

The traffic counts at the Cawston Urban Extension site undertaken by SARD as part of the Ashlawn Road Appeal were discredited during the process. The main issue being the methodology which was adopted resulted in double counting of vehicles, meaning the values produced through the survey represented an overestimate of the numbers which they were purported to represent. This led to concern about the reliability and soundness of the group's information as argued by the Appellants during the Public Inquiry. In addition, the Planning Inspector noted in his response on the appeal the following in regards to the SARD traffic survey of the Cawston Urban Extension;

*'The survey of this site carried out by SARD did not include vehicles entering the estate. The results are therefore meaningless, as there are obvious 'through routes' in the estate which makes in an inevitable over-estimate by a factor which is unknowable on the evidence.'*¹ (Paragraph 29)

Furthermore the Inspector also commented the following in regards to the traffic count undertaken by SARD at the Dunchurch Crossroads Junction;

*'The results of the traffic count conducted by SARD over a 2 1/2 hour period at the junction are consistent with the baseline traffic flows that underpin the Addendum Transport Assessment'*² (Paragraph 23).

The same baseline traffic flow turning count data at Dunchurch Crossroads used in the Addendum Transport Assessment referred to above was used in the Rugby Wide Area Model update. This model was subsequently used for the Strategic Transport Assessment (LP20) and the data on which it is based at Dunchurch Crossroads has been shown to be sound during the Ashlawn Road appeal process.

¹ APP/E3715/W/16/3147448 – Paragraph 29

² APP/E3715/W/16/3147448 – Paragraph 23

2. Dunchurch Parish Council – Traffic Count

Question:

The pending traffic survey commissioned by Dunchurch Parish Council is independent of these A45 / A4429 / M45 traffic figures prepared by Colin Reeves. Our apologies but we do not have the dates when these will be available nor do we have sight of the remit underpinning the traffic survey and how the data might be interpolated. SAVE Dunchurch do wish to emphasise though the point made at the examination that it is the scope – in strategic road network terms, the parameters of the model and its robust testing – that is so critical in informing sustainable planning decisions.

Response:

The traffic data which has been used to underpin the Rugby Wide Area model is data which has been collected during a neutral period which avoids main and local holiday periods, school holidays and other abnormal traffic periods (WebTAG unit M1.2 para 3.36). It is then assessed using the GEH and flow criteria for calibration assessment which is intended to account, in part, for the variability in observed traffic conditions between different neutral periods. The traffic counts used within the model were undertaken over a consistent period and therefore result in a model being developed which is representative of neutral 2016 network conditions, which is in line with WebTAG guidelines. The model exceeds all of the necessary criteria for highway assignment model calibration outlined within WebTAG both across the network and at the crossroads in Dunchurch.

Warwickshire County Council and Vectos Microsim have assessed the impact of the proposed development growth and strategic allocations in accordance with the National Planning Policy Framework and Planning Practice Guidance. In addition the model conforms to the DfT's WebTAG requirements for Strategic Models. This requires the provision of a robust and up to date evidence based on real traffic flows and movements.

In addition any planning application of strategic nature will need to be accompanied by a Transport Assessment to ascertain the impact of the development proposals on the operation of the transport networks and identify how these will be mitigated. Further Strategic Modelling will be required as part of this process in accordance with Policy LUT 5 - Transport Assessments set out in the Warwickshire Local Transport Plan.

Warwickshire County Council Response to DB Symmetry

Question:

Just released (subsequently to the South West Rugby day's proceedings) are WCC formal response to the DB Symmetry application. The findings wholly reinforce the points raised by SAVE Dunchurch to the Inspector in written statements, the examination days and 1 & 2 above. We believe them to be a crucial and material consideration not only in relation to the A45 / A4429 / M45 Junction and the Dunchurch and Thurlaston communities but to the strategic transport planning that underpins RBC's Local Plan because WCC's objections: cite adverse effects on the Rugby Gyratory; Local roads to Princethorpe; the Dunchurch Crossroads the need for and programme for the opening of the south west spine and crucially that this development is "on its own is isolated and would be a car dominated development". Cumulatively, these objections reinforce the concerns of SAVE Dunchurch and the community because, in our view and as further evidence materialises, they reveal the very same shortcomings of the area wide transport infrastructure planning that underpins the Rugby's Local Plan.

Response:

Warwickshire County Council has objected to the planning application submitted by DB Symmetry. The reason the objection has been submitted is that the Highway Authority has concerns in regards to the methodology which has been utilised within the Transport Assessment, most notably for the assessment of the Dunchurch Crossroads. In addition the Highway Authority has concerns regarding the lack of assessment of the Rugby Gyratory and A423 Oxford Road / B4455 Fosse Way / B4453 Rugby Road at Princethorpe.

The Highway Authority also has concerns regarding the ability for the proposed access arrangements to accommodate future traffic growth and therefore further assessment and design work is required by the applicant.

The Highway Authority has also requested additional information to support the access arrangements to demonstrate they will be able to safely operate. The Highway Authority has requested a Road Safety Audit Stage 1 and vehicle tracking drawings.

The above is a normal process through the assessment of a planning application, and for the Highway Authority to object in order to obtain additional information and clarification to enable it fully consider the application. This is in accordance with the Highway Authority's statutory function. It should be noted that at this time the Highway Authority is neutral about the development proposal based on the need for this information to ensure that the development fully mitigates its impact on the highway and transport networks, and meets the requirements of national and local planning policy, and design standards.

I trust the above provides some clarification in regards to the matters you have raised in your email.

Yours faithfully

Ben Simm

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Transport & Economy