

## Elmsbrook Traffic & Parking Group – Brief Response relating to ‘TN009 – Response to OCC’ – 26/08/22

The most recent TN009 seems to continue to find more ways in which to suggest that the solution to utilise the existing infrastructure - only using Charlotte and Braeburn Avenue for the long-term vehicle access to the proposed 530 homes - and that this will somehow manage to cope with the traffic levels the new development will bring. This demonstrates a blinkered approach by the developer who is clearly more concerned with cost rather than an open approach where the Eco principles, needs and amenities enjoyed by all residents is not significantly impacted. At no point does it consider an alternative, e.g. to make the proposed temporary 3<sup>rd</sup> access for construction traffic into a permanent junction - and OCC's reviewer has already stated that they see no reason why this couldn't be done.

The key problem is that the methods proposed in TN009 ignore many critical problems, still refusing to acknowledge these and perform/show proper calculations, including making use of the most recent (Sept. 2021) traffic surveys and monitoring data, to test the many assumptions used in the modelling. In fact, ignoring this vital source of data leads to the impression it is perhaps being deliberately ignored, for fear it will give an unwanted answer – namely, concurring with this group's previous analysis showing the traffic levels are vastly underestimated by the model.

While there has been no update on the CDC Planning Portal, to state if/when the new deadline for comments might be, or when the new target committee date might be, we have prepared this response just in case. Because there still remains a lack of attention to what we believe are the most critical points – the zero carbon aspect of the home builds remains key, but since it is only Transport/Traffic impact which have received additional documentation on the Planning Portal, we can only address the critical errors and omissions in the traffic Impact Assessment here and assume that CDC will take appropriate action with respect to other planning conditions that apply to the Eco Town. Please consider each of the points below, considering that alternative solutions can potentially avoid all the issues:

1. This most recent TNs focusses on the stretch of road *North* of Gagle Brook School, where there is the longer narrow stretch to 4.1 metres – and *not* the stretch South/East of the school, by the park, where the traffic flow is higher and there are 2x one-way bottlenecks to 4.0 metres and with double bollards 0.50 m from the curb sides – at each of 4 locations here. These – even tighter impingements on traffic flow – continue to be completely ignored (we have pointed them out 3 times now, and have yet to see any response related to them), despite the fact that these take more traffic (than the North side) in the 8-9AM peak hour, and are the main reason that the predicted traffic levels are so inaccurate: if they are not modelled properly, then the true impact remains unassessed.

2. For the stretch of road *North* of Gagle Brook School, the suggestion is made to widen the 4.1 m section north of the school, albeit with an issue already raised being the existence of trees in the pavement regions. Doing this would also, as we understand it, reduce the widths such as to then prevent the footpath(s) being for both bicycles and pedestrians. Since this is one of the 2x main stretches used to walk and cycle the pupils to school, this would be a huge concern. (Not to mention a major/long operation, since the curb stones have "special" drainage features, and some water-meters are installed very close to the curb.)

The stretches here by the bridge are already barely wide enough for an adult with a child holding each hand, i.e. 3-abreast – which is surely the minimum (since we are undoubtedly going to *have* to have Walking Bus schemes as per the GBS Travel Plan at some point in the future due to significant lack of any places for cars to park). Presumably, the same widening would also then be required at the park bottlenecks – which then removes the “safe” crossings into the park for kids using it; again, going against the clear intention of the original design for Safety of pedestrians and cyclists (especially younger ones).

3. Our understanding of the initial master plan is that the stretch of road between school and bus gate was never meant to receive any additional traffic than the Exemplar phase, i.e. since the Eastern parcel was not part of the original Masterplan which was modelled, and thus no traffic from what was not planned to be built. Residents thus bought homes on the stretch of Charlotte Avenue between school and bus gate on the assumption that their street would have certain characteristics, pavement width, landscaping, etc, and any change to their pavement structure as this could impact their quality of life and property value. To amend this stretch of road and infrastructure as suggested by the Developer is therefore unreasonable.

A resident wrote about this, stating: "It is extremely difficult to understand for a "non-Elmsbrook" person to how I(we) feel. I am seriously at breaking point and I am ready to fight. I've had enough constant psychological terror from Firethorn owners. The whole situation is seriously affecting my day to day life." (We have had to frequently reassure this person, to try to help them feel calmer about it.)

4. Furthermore, the bridge north of the school would (we believe) need significant redevelopment, as the current design with a bend at one end, the traffic calming bollards which only allow a single file of traffic, and a narrow stretch of road at the other (as per the Phase 1-2 park/bridge) reduces speed and encourages people to drive with caution in that area - which would further increase congestion in and around that part of the school. Removing these bollards to increase traffic flow would then likely increase average speeds along Charlotte Avenue between the school and the bus lane at the end of the road, again increasing risk - to kids walking/cycling to school along there. Residents in the later part of Charlotte Avenue, plus Wintergreen Fields, Lovage Close and Carraway Fields, would also be forced to join significantly higher traffic volumes on exiting their part of the development.

Another resident's email on this included the following: "One of the reasons I bought my house in Elmsbrook was the width of the pavement allows space for both cyclists and pedestrians to share the pavement. If narrowed the cyclists will be forced to ride in the road increasing the danger to them due to the increased motor traffic and further reducing speeds, which may cause further congestion."

5. VTP's original statement that they can't use traffic surveys due to Covid lockdowns is not longer valid – because Mode carried out just such a full-day survey in September 2021. Also, the traffic monitoring data is available from Mode for the years up to March 2020. All these datasets show how significantly the VTP figures underestimate the true traffic levels. Why are Firethorn/VTP not required to assess using that data, now it's available? Without comparison and quantification of these results, it seems impossible to be able to trust their simulation results.

6. The figure for the 8-9AM peak hour vehicle count remains 140, reduced from 636 – but still with no explanation of why/how. We believe this needs to be challenged with Firethorn/VTP, as it certainly seems completely unreasonable in practice – as per the calculations which we set out in our previous response, in Section A, Part 4.

7. VTP state, again, that the original design "must have" been acceptable to OCC, when it was signed off in 2016, based on future scenarios for the Ecotown Masterplan. However, 14% of the total homes which would be accessed via Charlotte and Braeburn Avenues – of the Firethorn scheme were accepted as it stands – are located on a field which was never part of the Masterplan, and was "added on" in or after 2018-19 – the "Eastern Parcel" in Firethorn's application. In fact, re TN009 Clause 2.1.2 - entering a Section 38 agreement does not mean that the highway will be adopted for sure, even if this was the intention - private highways in the development may stay private if local highway authority is not satisfied and the legal agreement not executed.

That Firethorn have now stated this argument on multiple occasions means it seems to be a pressure point they want to keep making, which reads very strangely to concerned residents. Many residents' discussions recently have actually voiced concerns about what the developers are trying to achieve – since the community has had no dialogue since early days (which seemed to go very well!), and yet so few of the key issues that residents raised then, and have continually raised since, appear to be either in discussion or being addressed, particularly regarding traffic impacts overall and the zero carbon build aspects.

**In Conclusion:** We would be very grateful indeed for any answers that can be provided to the above. In the meantime, we can only continue to raise our Objections – as we simply cannot understand how this application could be allowed to be brought to Committee when it is still contradicting key development principles, proposing changes which would seriously adversely affect a large number of homeowners in very direct ways, along with the School plus all homeowners (current and future) at peak traffic/commute times. There is still a clear lack of evidence to show that traffic impacts would not be 'severe', based on NPPF paras. 109-111. We hope that the developers and their consultants will (finally) reconsider their stance for the last two application revisions, and communicate with us effectively again, regarding traffic impact and eco home aspects outlined above. *Thank you.*