

Substantive response of the Local Highway Authority to a planning consultation received under The Development Management Order.



Response provided under the delegated authority of the Director of Environment & Transport.

APPLICATION DETAILS

Planning Application Number: 24/00083/HYB

Highway Reference Number: 2024/0083/04/H/R3

Application Address: Land At Burbage Fields Farm Bullfurlong Lane Burbage Leicestershire

Application Type: Hybrid

Description of Application: Re-consultation. Hybrid planning application for 422 dwellings, public open space, associated infrastructure and the demolition of 65 and 65a Coventry Road, and Burbage Fields Farm and outline planning application for a residential care home and up to 11no. self-build plots (all matters reserved except for access)

GENERAL DETAILS

Planning Case Officer: Alex Jelley

Applicant: Redrow Homes and Peter Andrew Farmer

County Councillor: Cllr Barry Walker

Parish: Burbage

Road Classification: Adopted Unclassified

Substantive Response provided in accordance with article 22(5) of The Town and Country Planning (Development Management Procedure) (England) Order 2015:

The Local Highway Authority does not consider that the application as submitted fully assesses the highway impact of the proposed development and further information is required as set out in this response. Without this information the Local Highway Authority is unable to provide final highway advice on this application.

Advice to Local Planning Authority

Background

The Local Highway Authority (LHA) has been reconsulted by the Local Planning Authority (LPA), Hinckley and Bosworth Borough Council (HBBC), on a mixed use development on land at Burbage Fields Farm Bullfurlong Lane Burbage, to provide 422 dwellings, public open space, associated infrastructure and the demolition of 65 and 65a Coventry Road, and Burbage Fields Farm and outline planning application for a residential care home and up to 11no. self-build plots.

This is the LHA fourth response to the planning application. The initial response (February 2024) was a holding response pending a review of the information submitted. In the second and third responses (April 2024, and June 2024) the LHA identified concerns with the following issues associated with the proposed development which are summarised below for reference:

- Proposed site access arrangements and swept path analysis;
- Additional Personal Injury Collision data for at least 2023;
- Junction model files to check junction capacity assessments;

- Amendments to internal layout;
- Updated Residential Travel Plan; and
- Details of Public Rights of Way improvements.

The applicant has now submitted the following documents / plans to address the outstanding issues:

- Lichfields Resubmission Covering Letter ref: 61188/04/JK/LGa/32623016v1, 'Application for Hybrid Planning Permission: Land to the south of Burbage', dated 29 August 2024;
- Pegasus Group Design and Access Statement, document ref: P22-2560_G001_C, 'Land at Burbage Fields Farm, Burbage', dated August 2024;
- Redrow Homes Midlands drawing number: 1693-08-02-100, 'Land south of Burbage – Site Layout', Revision C, dated 22 August 2024;
- Redrow Homes Midlands drawing number: 1693-08-02-120, 'Land south of Burbage – Site Location Plan', dated November 2023;
- Redrow Homes Midlands drawing number: 1693-08-02-122, 'Land south of Burbage – Highway Adoption Plan', Revision A, dated 22 August 2024;
- Redrow Homes Midlands drawing number: 1693-08-02-145, 'Land south of Burbage – Bin Refuse Plan', Revision A, dated 22 August 2024;
- Redrow Homes Midlands drawing number: 1693-08-02-147, 'Land south of Burbage – Parking Strategy Plan', Revision A, dated 22 August 2024;
- Redrow Homes Midlands drawing number: 1693-08-02-148, 'Land south of Burbage – Road Hierarchy Plan', Revision A, dated 22 August 2024;
- Rodgers Leask Limited Updated Transport Assessment (UTA) 'Land south of Burbage', Report Ref: 21390-RLL-23-XX-RP-D-5001, Revision P08, dated July 2024; and
- Rodgers Leask Limited Residential Travel Plan (RTP) 'Land south of Burbage', Report Ref: 21390-RLL-23-XX-RP-D-5009, Revision P07, dated August 2024.

Site Access

In the most recent highway observations on the planning application the LHA asked the applicant to reconsider the site access arrangements to ensure that a safe and suitable vehicular access could be delivered to serve the proposed development. The LHA has reviewed the updated site access information in Section 4 of the UTA and offers further comments below:

- An updated Stage 1 Road Safety Audit (RSA1) and designer responses form has been provided. The LHA note that the designer states that the presence of driveways either side of the proposed access will restrict space for parking and hence keep the visibility splays clear. However, the LHA understand that residents and their visitors may still be able to park across the driveways so they would not be guaranteed to be clear at all times.
- Notwithstanding the ghost right turn Section 4 of the Transport Assessment (July 2024 Rev P08) provides reasons for the location of the Coventry Road crossing point, and these are accepted. Drawing 21390-RLL-23-XX-DR-D-5008 rev P08 shows the proposed uncontrolled pedestrian crossing with tactile paving.
- The swept path for the No 67 left out manoeuvre shows approximately 450mm clearance between the tactile paving and the turning vehicle. The swept path for the No 69 left in manoeuvre shows approximately 900mm clearance between the tactile paving and the turning vehicle. At the detailed design stage, the provision of a bollard should be investigated to ensure vehicles do not overrun the tactile paving.

Ghost Right Turn

Paragraphs 4.2.5 to 4.2.15 of the UTA outlines the applicant's opinion as to why a ghost right turn lane would not be suitable and the reasons for the location of the spine road crossing point.

The LHA acknowledge the additional information, but the paragraph quoted from Manual for Streets 2 mentions daily flows of 500 vehicles from a side road and the proposals would generate a significant number of trips above this. Given this will be the only site access to serve the proposed development the applicant should look at any additional information / measures that could be implemented to ensure that the site access is safe and suitable. Furthermore, as discussed under the heading 'Highway Impact', clarification is required regarding flows, which will affect the assessment of the suitability of the junction type.

Parking Survey

The LHA previously expressed concerns with on-street parking in visibility splays and possible overtaking because of this. The applicant has undertaken a parking survey along Coventry Road on a Thursday, Saturday and Sunday in September 2023 to establish the current position. An overall plan of the study area is included in Appendix J of the UTS but in summary it covers a section of Coventry Road, between 21 Coventry Road and Cotes Road, and approximately 100m of Bullfurlong Lane and Victoria Road.

The study area has been split into 11 zones, and the results of the parking survey indicate that there is sufficient space in the vicinity of the site, including zones 7 and 8 (on the southern side of Coventry Road) even if the TRO is implemented which would restrict parking near the site access to protect the visibility splays. The full results of the parking survey are in Appendix J of the UTA. Notwithstanding the above the applicant has not provided details of which part of the highway each zone has been included therefore, the applicant should provide these details for review and approval. It is also important to note that a TRO is a Legal Order, and this is entirely separate from the planning process; to implement a TRO requires a formal consultation, and as such, there is no guarantee that the proposed restrictions could be implemented.

Junction Capacity Assessment

The LHA has checked the junction capacity assessment for the site access / Coventry Road and there is sufficient capacity, however the LHA note that there could be some minor delays for vehicles that leave the site in 2026 and 2031 particularly in the AM peak hour. The results from the capacity assessments are shown in Table 30 of the UTA is reproduced in Figure 1 below:

Table 30: Coventry Road / Site Access Results

	AM					PM				
	Set ID	Queue (Veh)	Delay (s)	RFC	LOS	Set ID	Queue (Veh)	Delay (s)	RFC	LOS
	2026 Opening Year + Development									
Stream B-AC	D5	1.0	15.65	0.51	C	D6	0.2	9.25	0.18	A
Stream C-AB		0.2	5.46	0.14	A		0.5	5.90	0.23	A
	2031 Forecast Year + Development									
Stream B-AC	D9	1.0	15.35	0.51	C	D10	0.2	9.37	0.18	A
Stream C-AB		0.3	5.21	0.14	A		0.5	5.92	0.23	A

Note: A – Coventry Road East, B – Site Access Road, C – Coventry Road West

Figure 1: Junction Capacity Assessment results from Table 30 of the Updated Transport Assessment

Notwithstanding the above the LHA has concerns whether the correct flows have been used and therefore the applicant should ensure that the traffic flow diagrams and inputs into the junction models for the site access flows are correct and reflect the latest proposals i.e. all development traffic will use one access on to Coventry Road.

Bus Stop Removal

The applicant has identified that the existing bus stop on Coventry Road opposite the proposed development will need relocating to facilitate the site access arrangements.

Whilst a suitable location has not been identified yet the LHA will continue to liaise with the applicant to ensure an alternative location for the bus stop if permission is granted.

Highway Safety

After a review of the Personal Injury Collision (PIC) data the LHA asked the applicant to consider the circumstances around a collision on Coventry Road in January 2023.

The applicant has reviewed the details of the incident in paragraphs 3.3.7 – 3.3.9 of the UTA and concluded that this was an isolated case on Coventry Road and did not indicate a wider safety issue on Coventry Road.

The LHA acknowledge the further investigation however the LHA cannot determine if there would be an additional highway safety issue until the applicant has demonstrated they can deliver a safe and suitable access in accordance with Paragraph 114 of the National Planning Policy Framework (NPPF, December 2023).

Highway Impact

In the highway observations dated 14 June 2024, the LHA outlined how the applicant had tested the impact of the proposed development and the future scenarios that were considered. However, the LHA highlighted the discrepancies in how the assessment had been undertaken including:

- Implications of proposed Burbage Fields development modelled with two vehicular accesses and subsequent planning application only having one vehicular access;
- No detailed analysis of the results i.e. junction capacity assessments have been undertaken by the applicant for the 2031 scenario; and
- No details of B4109 Rugby Road / Brookside junction assessment submitted.

Trip Rates / Trip Generation

The trip rates / trip generation submitted by the applicant were robust and suitable to test the impact of the proposed development on the local highway.

Trip distribution and assignment

The LHA has considered the trip distribution derived from the Pan Regional Transport Model (PRTM) work undertaken to support the proposed development.

The applicant has predicted trip distribution for the development utilising a parent zone approach. An existing PRTM zone (6014) with similar characteristics to the development proposals was used to ensure a reasonable trip distribution was applied for the new trips generated and subsequently assigned to the network.

The PRTM model then assigns the traffic onto the network. Whilst for most destinations there are several alternative routes which can be used, the optimal route is selected by the model based on time, journey cost, congestion and delay. This approach is used to better represent real life driver behaviour and choice through the modelling process, rather than the traditional use of census data.

The approach taken is consistent with other developments of this scale but the outputs are subject to further analysis by the LHA.

Future PRTM Flows

To establish robust inputs for the local junction assessments a revised set of modelled flows for all scenarios (base + development) have been produced which utilise observed turning movements and modelled growth applied appropriately. This methodology is generally considered acceptable to the LHA.

Flow diagrams

Distribution plots / graphs in Appendix P of the UTA predict that of 46% of development traffic to / from the east of the site and 54% of traffic to / from the Rugby Road area to the west of the site. The LHA is concerned whether the flows / distribution from the Coventry Road site access are correct (as highlighted in National Highways (NH) response). Furthermore, the applicant should confirm that the Coventry Road site access includes any development traffic that might have used the Flanders Close access in the PRTM model runs has been reallocated to Coventry Road.

The LHA has also undertaken a high-level review of the flow diagrams for all scenarios. There are several areas of concern that need addressing and the LHA note NH's latest response to the application (September 2024) and their comments on the assignment. The LHA would agree with NH's summary on this issue and would ask the applicant to clarify the discrepancies i.e. reduced traffic flows in the 2026 2031 scenarios.

Junction Capacity Assessments

The applicant identified 11 junctions (including the site access referenced above) in their initial analysis. The revised TA now includes:

- Coventry Road / Site Access;
- B578 Lutterworth Road / Passchendaele Drive priority junction;
- B4109 Rugby Road / Three Pots Road / Canberra Way roundabout;
- B4109 Rugby Road / Sketchley Road / Sketchley Lane roundabout;
- B4109 Rugby Road / Brookside signalised junction;
- B578 Lutterworth Road / Lychgate Lane priority junction;
- B4669 Sapcote Road / B4669 Burbage Road / B578 Hinckley Road priority junction;
- A5 / B578 Lutterworth Road priority junction;
- A5 / Wolvey Road priority junction; and
- M69 Junction 1 signalised roundabout.

The LHA will check all the junction models and results when the applicant has checked the 2026 and 2031 traffic flows and development flows.

Internal Layout

The LHA has now had the opportunity to check the internal layout of the site submitted for the planning application shown on the following plans:

- Site Layout drawing number: 1693-08-02-100 Rev. C;
- Coloured Site Plan drawing number: 1693-08-02-110 Rev. A; and
- Bin Refuse Plan drawing number: 1693-08-02-145 Rev. A.

The LHA offers further comments below for consideration / action:

- The speed control measures currently designed into the layout are not acceptable. The maximum distance between speed control measures, junctions or 90-degree bends is either 60m or 40m depending on the design speed of the road. The use of cushions rather than full raised tables is also something that we do not accept. The chicanes proposed are not in accordance with the LHDG, please see Figure DG5b for further information.
- Further to the comment above, the minimum plateau length of vertical speed control measures should be 8m, and the ramps should not conflict with the access drives of the dwellings. For further information, please see Part 3 of the LHDG, Figure DG5e.
- The bend widening has not been shown in accordance with Para 3.33 in Part 3 of the LHDG. The widening covers both running lanes and so does not need to be replicated on either side. There are also bends of more than 10° within the development, serving more than 25 dwellings, without widening.
- The radii at the junctions and turning heads should be detailed on the plan to ensure they are in accordance with the LHDG.
- The junction radii should typically be 6m for any side roads. For further information please see Table DG5 of Part 3 of the LHDG.
- The applicant should also note that radii for turning heads should typically be 7.5m. Please see Figure DG4b of the LHDG (Part 3) for further information.
- Most of the shared surfaces in the layout are more than the maximum 50m between junctions/90-degree bends. In the affected areas, they should be shortened to be in accordance and the private drives/'normal' carriageway extended to suit.
- Some of the proposed areas of highway have visitor parking bays. The applicant should note that LCC would not seek to adopt these areas, so they should be relocated to be behind the finished highway boundary.
- Please note that turning heads should typically end at the tangent point of the radii, unless specifically identified to need lengthening for vehicle tracking purposes. In affected areas, the private drives can be extended to suit.
- A 1m service margin is required on the north/east side of the road that serves plots 130-175. This should provisionally be shown as a bituminous margin.
- As mentioned previously, if any roads with less than five frontages are proposed for adoption, these are not in accordance with the LHDG and should be altered to increase the number of frontages or made private.
- Please provide vehicle tracking for the site using the attached refuse vehicle specification, in addition to a bus. Tracking should include all adoptable turning heads for the refuse vehicle,

and any private drives where the bin collection point is sited more than 25m from the highway. The bus stop tracking should take place around the junctions and bends on the loop and tracking should also be submitted of these vehicles around any proposed chicanes (once updated in line with LCC standards).

- It is noted that a 3m shared footway/cycleway has been introduced on the east side of the spine. Please amend to a segregated 3m cycleway and 2m footway adjacent along the spine, where not fronting plots, in line with LTN 1/20.
- It is understood that a segregated cycleway and footway would be difficult to design at accesses/plot frontages. As such, please continue with the shared 3m footway/cycleway from Plot 340 all the way around the loop.
- Please also continue the 3m shared footway/cycleway along the road linking to the 'Emergency Link' as this could be a link through to the adjacent phase and to the east.
- Management and design of where the cycleways cross vehicle accesses and junctions are to be considered further at the Section 38 (S38) stage.

Other Considerations

- Please ensure that any tree that is to be planted within the highway or the vicinity of the highway is provided with the necessary root protection and likewise any tree that is to remain within the highway or vicinity of the highway is also provided with the necessary tree root protection.
- Where trees are to overhang the highway, they must be of a type with a minimum clear stem of 2.2m. Please note that any tree that is to be situated within the highway will attract a commuted sum in accordance with the LHDG Part 4, MC18, and will require further approval at the S38 stage from the LCC Forestry team (forestry@leics.gov.uk).
- Gradients should conform to the standards set out in Table DG1: General geometry of residential road (internal) of the LHDG, this will be checked further at the S38 stage.
- All drainage should be in accordance with part 3 DG11 of the LHDG. It must be ensured that surface water from private land does not run or pool in the public highway, this will be checked further at the S38 stage.
- At this stage it is not possible to comment on the vertical alignment, drainage, materials or proposed construction details.

Private Drives

All private drives across the development should be designed in accordance with Part 3 of the LHDG, and any private drives that connect adoptable roads will not be acceptable and should be severed.

Bin Collection Points

The LHA has carried out a spot check on the location of the Bin Collection Points (BCPs) shown on drawing number: 1693-08-02-145, to ensure they are not in the vehicular visibility splays or restrict the widths of drives and they are acceptable.

However, the applicant is reminded that any BCPs should be setback and 1m x 1m pedestrian visibility splays maintained.

Residential Parking

The LHA is pleased to advise that the parking provision across the site is in general accordance with the guidance in the LHDG and would not seek to resist the proposals based on the level of parking.

Care Home Parking

The LHA note that the residential care home is in outline and will provide accommodation of up to 66 bedrooms. Therefore, the LHA will comment on the internal layout and parking for the care home if the applicant secures planning permission.

However, the applicant should ensure that a refuse vehicle and ambulance can manoeuvre around the site and leave the site in a forward gear.

Public Rights of Way (PROW)

In the previous response, the LHA asked the applicant to consider the land ownership of Bullfurlong Lane and to formalise with the County Council the public pedestrian rights on the lane by a Deed of Dedication. This would be done in liaison with the neighbouring landowner on the western side of the lane to protect the existing movement network.

After a review of the additional information provided by the applicant the LHA acknowledge that it is not within the applicants' gift to deliver the improvements suggested on Bullfurlong Lane and because it is outside of their site boundary it is beyond their control.

Notwithstanding the above, the LHA advise there is likely to be a requirement for the applicant to divert, extinguish or improve the PROWs across the site if planning permission is granted.

Travel Plan

The LHA confirmed in its highway observations in June 2024 that the Residential Travel Plan (RTP) did not contain the necessary detail required for the scale of the proposed development.

After a review of the revised document (dated 1 August 2024) the LHA would advise the applicant that the following points need to be clarified or addressed before the plan can be approved.

- The targets for active travel (walking and cycling) are relatively modest, aiming for only a 5% modal shift over the five-year life span of the RTP. This reflects the limited incentives outlined in the plan to encourage active travel. The LHA would recommend enhancing the incentives to support a more ambitious target for cycling and walking.
- Leicestershire County Council's Road Safety and Education Team may not be able to provide Bikeability training. As this service cannot be guaranteed, the applicant should identify an alternative provider to ensure this action is fulfilled.
- The document should include at least three key measurement points: baseline, interim, and final assessments of mode shift outcome targets. Additionally, the travel data in Table 8 should reflect total trip numbers for all modes, not just peak-hour figures.

- The largest proposed increase in sustainable travel is in bus patronage, with a target of 4.9% over five years. However, it's important to note that Leicestershire County Council is currently reviewing and redesigning its supported bus network. Services 7 and 8, operated by Arriva, are partially subsidised, and this review may affect the availability of bus services in the area. The applicant should be prepared to reconsider public transport options for residents if changes occur and may need to explore alternative provision.

Should the current services remain unchanged, it is acknowledged that Arriva's services 7 and 8 would need to route through the development to serve the three identified bus stops, as per Figure 5: Potential Bus Service Diversion, providing residents with convenient access to public transport. These considerations should be reflected in the RTP, along with a contingency to ensure the targeted reductions in single-occupancy vehicle (SOV) travel are still met.

Subject to obtaining planning permission, the LHA would advise the applicant that to support active travel measures there is likely to be Section 106 contributions for bus passes and travel packs for residents / employees of the care home, appointment of a Travel Plan Co-ordinator (TPC) and a Framework Travel Plan fee to provide support to the appointed TPC, audit annual performance reports to ensure that outcomes are being achieved

Date Received **Case Officer**
02 September 2024 **David Hunt**

Reviewer
RD

Date issued
01 November 2024