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25th January 2021

Hollands Farm Development Brief Consultation

Dear Buckinghamshire Council,

We are writing to respond to the consultation process for the Hollands Farm Development Brief (HFDB).

In general, although the HFDB is well-written we are concerned that it is a development framework for the site only and it barely touches on the road system outside the site except to acknowledge that some of the junctions will require assessment and redesign.

This letter addresses our concerns in respect of Highways issues relating to the access to the site and road system linking the site.

Attachment 1 provides specific points referencing the relevant section of the HFDB for the Highways issues set out below.

Our principle concerns are that that the Highways issues will not be addressed by the "outline planning permission" per section 7.2.1 of the HFDB and that Highways Department have consistently refused to acknowledge the need to address the Highways issues with their own assessment and to have a policy to prepare for the planning application, which for a site of this size with its attendant problems is...

far too late, and

is contrary to the intent of the National planning Policy Framework NPPF paragraphs 102 and 108 (an extract of the relevant wording is given in attachment 1).

The Princes Road and Hedsor Road issues explained below each have road safety dimensions. If Highways Department's reluctance to address these matters is due to funding, then the Council should ring fence the CIL monies generated by the development to fund the mitigations required to make the site the best it can be.

Issue #1 Princes Road

6.5.15 says "Width restrictions on Princes Road results in insufficient space to allow for 6.5 metre carriage way requirements for two buses to pass each other..... The technical design for the Principal Route will ensure a two-way bus service can be accommodated safely and without unduly impeding the flow of other traffic, except at

this location on Princes Road where the existing road width is constrained."

The Parish Council believe that there are options available such as Compulsory Purchase Orders to overcome this issue which have not been considered.

If road width cannot allow 2 buses/HGVs to pass, then Highways Department should not give their consent for the Development to proceed.

Issue #2 Hedsor Road

This is the exit point for the Link Road through Hollands Farm. The Link Road is called the Principal Route in the HFDB and is intended to provide access for the Development's residents and for A4094 traffic heading to Cookham Bridge.

Paragraph 6.4.4.b) and d) say:

b) Dependant on a requisite junction analysis, a T-junction is preferable over a roundabout option as this is less intrusive, and

d) Junction design at Hedsor Road/Ferry Lane should minimise the risk of pedestrian and vehicular accident.

That the Principal route will be so constrained at both ends requires Highways Department to exert leadership to identify the best options to ensure both safe access and traffic flow and these should be agreed in the Development Brief. It will be too late once it is adopted.

The T-junction suggested (without a transport assessment or review of the junctions) will lead to traffic backing up on the Principal route and safety issues as drivers turning right at a blind bend take risks to exit the site. Once onto Hedsor Road, drivers will immediately face another queue onto the Ferry Lane junction which is a notoriously unsafe design and which experiences frequent accidents.

It is appalling that these junctions at Hedsor Road have not been assessed and the best mitigations agreed (with agreement on who will pay for them) as part of the HFDB process. If these are not agreed in the HFDB and ahead of the expected planning application that will quickly follow adoption of the HFDB, then neither the Developer nor the Planning Authority will have any incentive to identify the best mitigations for the Site. They will accept the minimum in accordance with the current HFDB.

Issue # 3 Millboard Road

The Local Plan fig 39 page 289 showed a layout for the development in which they indicated three potential vehicular access points: Millboard Road, Princes Road, Hedsor Road. The Local Plan did not indicate that Millboard Road was outside of their ability to

deliver it giving the impression that it was part of the plan and was therefore unchallenged in the Local Plan examination.

The HFDB paragraphs relating to Millboard Road show it is subject to delivery as it is in private ownership. However, neither the Developer nor Highways Department have made any reported effort to engage the owner to identify how this could be delivered.

The Parish Council is concerned that delivery of Millboard Road is a critical part of making the Site, the School location and their access, a success and an opportunity to either address the safety issues relating to Cores End Road or reduce some traffic that would otherwise use Cores End Road to get to the School.

Off site, junction improvements

Paragraph 6.5.22 identifies off site junction improvements that need to be assessed, but 6.5.23 says the detail will be for the Transport Assessment at the planning application stage - too late to agree who will fund any improvements required and, if the Developer's assessment is used, it is unlikely to select the best mitigations if they are expensive.

In conclusion, given how quickly planning applications must be determined and the fact that Highways Department will not have conducted their own transport assessments prior to receiving the planning application, we are concerned that the planning application will be determined without the wider issues raised here being resolved because they are not resolved in the HFDB. Finally, we would mention this letter relates solely to Highways matters; we do have some additional remarks, including in respect of the Orchard and Sports pitches, on which we will write separately.

Yours faithfully

Cllr. Sue Wagner - Chairman of the Council

Attachment 1

Planning Consent

The Hollands Farm Development Brief (HFDB) says "The Council will require "outline and reserve matters planning application accompanied by detailed phasing and infrastructure delivery plan for the whole HFDB area, including offsite infrastructure" (new section 7 para 7.2.1)", which in our opinion means that the Highways issues relating to the site will not be addressed by identifying the best solutions for resolution/mitigation.

While there will be a requirement for the planning application from the Developer to include a Transport Assessment, the Parish Council contends that Highways Department should be involved much earlier in an assessment as they will not have time to conduct their own once a planning application is submitted. The proposed Link Road (Principal Route) provides opportunities to improve road safety in the road system linking the site which should be part of an integrated highways plan for the area.

There are also critical safety issues relating to Princess Road and Hedsor Road which are not adequately resolved in the HFDB

We believe the HFDB is inadequate because it lacks Highways Department assessment of the surrounding network per guidance in the National Planning Policy Framework (NPPF) per the paragraphs below:

NPPF102. Transport issues should be considered from the earliest stages of plan making and development proposals, so that:

a) the potential impacts of development on transport networks can be addressed,

b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised - for example in relation to the scale, location or density of development that can be accommodated.

NPPF 108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

b) safe and suitable access to the site can be achieved for all users; and

c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree

Highways Department conducted high level transport modelling at the time of the production of the Local Plan. However, given the opportunities the Link Road presents, the width limitations at Princes Road, and the issues relating to access discussed below, Highways Department should conduct a detailed assessment

ahead of a planning application to address the issues (per NPPF 108 b)] relating to access and to consider the opportunities the development presents.

The key issues that are not addressed satisfactorily in the conceptual development of Hollands Farm are all Highways issues relating to access to and from the Development.

While 4.11 Access, Transport and Movement paragraph 4.11.1 acknowledges the constraints and limitations, there are no solutions offered which, given the intent of the NPPF paragraphs 102 and 108, should not be accepted.

At all times Highways Department policy has been to ignore issues raised, stating they will wait for the Transport Assessment which accompanies the planning application. The Parish Council believes that this is too late in the process. The specific issues are set out below for each access point referencing the relevant section/paragraph of the HFDB:

Cores End roundabout /Princes Road

a) Section 4.19.4 Opportunities. The Development of the site and the proposed Link Road provides an opportunity to consider safety improvements on the section of Cores End Road from the roundabout to Millboard Road.

Whilst this is not the concern of the Developer it should be on Highways Department's radar and should be listed as an opportunity in the HFDB and Highways Department should already be considering how to integrate improvements not just at the roundabout but along Cores End Road which is a dangerous road for pedestrians and road users alike. This is where the Link Road and access via Millboard Road present opportunities.

Given the intent of NPPF 102 and 108, Highways department should be assessing the impacts of the Link Road on the road network around the site ahead of the planning application because they influence each other

There is an opportunity to make safety improvements on Cores End Road by actively ensuring the Millboard Road access is delivered (see Millboard Road below).

b) The width of Princes Road at the junction with Cores End Road. Section 6.5 Access and Transport Movement; paragraphs

6.5.2 A Principal Route should be provided to connect Cores End Road / Brookbank / Town Lane to Ferry Lane. This will provide the primary vehicular route through the site, to which other roads within the site will be connected, and should be built to allow large vehicles to pass in two directions.

Para 6.5.5 The Principal Route should take into account the following principles:

"Accommodate a two way bus service where the road width allows."

6.5.3 Access from Hedsor Road and Princes Road by the Principal Route will require widening of the existing access routes

6.5.15 Width restrictions on Princes Road results in insufficient space to allow for 6.5m carriage way requirements for two buses to pass each other at the same time. The technical design for the Principal Route will ensure a two-way bus service can be accommodated safely and without unduly impeding the flow of other traffic, except at this location on Princes Road where the existing road width is constrained.

The Planning Authority have not sought to find a better solution, simply accepting the constraint in flagrant disregard to the NPPF paragraph 108 b) safe and suitable access to the site can be achieved for all users.

It seems that the Planning Authority have no interest in making sure that the proposed Link Road can safely accommodate the traffic that will inevitably use it or to avoid the problems that exist on the Cores End Road part of the A4094.

The maximum HGV width is 2.9 metres with provision for 305 mm overhang. Options should be identified that would allow a 6.5 metre road width along Princes Road to the roundabout even if an option means compulsory purchase of a building or buildings on either side of Princes Road which paragraph 6.5.3 implies.

The Development should not proceed unless 2 HGV's or buses can pass each other all the way along Princes Road as this will lead to the same safety issues and accidents

we already see on Cores End Road which is an 'A' road (A4094).

(Upper) Hedsor Road

The HFDB paragraph 6.4.4.

b) Dependant on a requisite junction analysis, a T-junction is preferable over a roundabout option as this is less intrusive; and

a) Junction design at Hedsor Road/Ferry Lane should minimise the risk of pedestrian and vehicular accident

Ideally access to Hedsor Road would be via a roundabout onto Ferry Lane, but this will not happen as the land was not reserved in the Local Plan.

The current road design at Ferry Lane/Hedsor Road junction is very dangerous and there are frequent accidents from cars turning right from

Cookham and also cars on Hedsor Road from Bourne End exiting left very fast, already travelling at 30 mph onto (Upper) Hedsor Road at the Ferry Lane junction.

Although the road almost immediately becomes 20 mph, traffic is generally moving faster because of the junction design and cars are not visible at the Hollands Farm junction from this direction due to a bend.

The Parish Council contends that the words of 6.4.4.b) pre-empt finding the best solution which should result from an independent assessment, not a biased assessment written to favour the developer.

It is the Parish Council's view (admittedly unsupported by a review of the junction, but then so is the HFDB similarly unsupported) that a T-junction at Hollands Farm will lead to queues which in turn will lead to drivers taking risks to turn right into fast moving oncoming traffic on a blind bend just before the Hollands Farm exit.

Millboard Road

Commitment to delivery of Millboard Road has been watered down.

b) Paragraph 4.19.4.f of the HFDB says: "Potential additional vehicle access points from the West - Bridgestone Drive, Millboard Road and Wessex Road.

c) Paragraph 5.2.6 Objective 5: b) Identify to what extent Millboard Road and Princes Road could potentially provide vehicular/pedestrian/cycle access.

d) 6.5.4 A road link to Millboard Road will improve accessibility if this can be delivered, and will have particular benefits to the primary school access and egress. However, this could reduce the benefits of reduced congestion through Bourne End provided by the Principal Route, this will need to be considered if the road is brought forward as part of the development. If Millboard Road is delivered, the bus route should still be provided along Princes Road. [As Highways Department only produced a high level assessment for Buckinghamshire at the time of the Local Plan the second sentence is speculation]

The Local Plan fig 39 page 289 showed a layout for the development in which they indicated three potential vehicular access points: Millboard Road, Princes Road, Hedsor Road. The Local Plan did not indicate that Millboard Road was outside their ability to deliver it, giving the impression that it was part of the plan and was therefore unchallenged in the Local Plan examination.

However, in HFDB discussions, it has become apparent that the Planning Authority is not in any way engaged or committed to making this happen, saying it is for the Developer to discuss this with the owner of the land. The Developer has not made any effort to do this because it is not being made a condition of the development proceeding.

The Parish Council contends that a development of 467 houses needs at least three vehicle access points and that access from Millboard Road is necessary not only to benefit Cores End Road (despite the wording of para 6.5.4 above with which we disagree), but also to support safe access to the proposed location of the School which will be sited next to Millboard Road.

Again, because Highways Department are not yet assessing the road system around the site, no thought has been given to what it would take to adopt the section of Millboard Road to make access possible.

Without proactive leadership from Highways Department to create the conditions to adopt Millboard Road, the planning application will go through without any attempt to make Millboard Road an access point.

Off site junction
improvements

Although Paragraphs 6.5.22 and 6.5.23 deal with off-site junction improvements for:

- Furlong Road / Cores End Road;

- Furlong Road / Station Road;

- Hedsor Road / Ferry Lane;

Hedsor Road / new Principal Road; and

Millboard Road / Cores End Road (subject to deliverability),

Paragraph 6.5.23 says "this detail will be for Transport Assessment at the planning application stage" which we feel is too late for Highways to take a holistic view of the whole road system and that this should be done ahead of adoption of the Development brief.

Conclusion:

Given how quickly planning applications must be determined and the fact that Highways Department will not have conducted their own transport assessments prior to receiving the planning application, we are concerned that the planning application will be determined without the wider issues raised here being resolved because they are not resolved in the HFDB.

All the Highways issues have been raised during the process of creating a Development Brief, but they are not recognized in the HFDB and Highways Department are on record saying they will wait until a planning application and transport assessment from the Developer.

This is unacceptable and reflects poorly on Buckinghamshire Council's Highways Department leadership who should be proactively working with the Planning Authority and Developer to identify the best options (not the least expensive to the Developer) to mitigate the real Site access issues.

The Parish Council feels strongly that the Highways issues should be addressed by identifying and selecting the best options to resolve the Highways issues in the Development Brief before it is adopted and before any planning application is received. Specifically, the access points at Princes Road, Hedsor Road, Millboard Road and the junction of Hedsor Road/Ferry Lane should be assessed by Highways department to identify the best solutions and how they will be funded. We would point out that CIL

monies generated by the development will be significant.

In respect of Millboard Road, Highways Department should take a proactive role in commencing a dialogue with the owner of Millboard Road to make this happen because, if they do not, the Developer will proceed without the delivery of Millboard Road.