PLANNING APPLICATIONS COMMITTEE

ADDENDUM
3rd September 2024

**Item
1**

ADD further response from WCC Highways regarding the Longford Road Corridor
Scheme and a review of the Exhall and Ash Green Residents traffic survey:

Longford Road Corridor Scheme

The Longford Road Corridor Scheme was identified as a scheme within the
Infrastructure Delivery Plan that would be required to mitigate the impacts of allocated
development sites within the local area in the current adopted Local Plan. The
scheme,
a concept design is enclosed, is proposed to deliver the following improvements:
• Upgrade the signalised junctions at Coventry Road/Bayton Rd/School Lane and
Coventry Rd/Blackhorse Lane/Longford Road/Wilsons Lane
• Provide signalised crossing facilities at the signalised junctions
• Improve capacity at the Longford Road/Wilsons Lane/Pickards Way roundabout
• Provide that part of the Nuneaton to Coventry strategic cycle route that coincides
with this part of the network

The Local Plan allocated sites identified as likely to have an impact and therefore
contribute towards the scheme were:
• HSG4 Woodlands
• HSG5 Hospital Lane
• HSG6 School Lane
• HSG12 Former Hawkesbury Golf Course
• EMP2 Wilsons Lane/Phoenix Way
• EMP6 Wilsons lane/Longford Road
• EMP7 Bowling Green Lane

Section 106 contributions (s106) have been requested from all of the development
sites that have been shown, as part of the traffic modelling carried out to support their
planning applications, to have a severe impact on the operation of the junctions. This
includes development sites such as Sutton Stop, close to the administrative boundary
within Coventry which also has a contribution secured via s106 agreement.

As a result of planning application proposals differing to those considered likely at the
time of the Local Plan; the quantum of development trips having changed; those
applications being submitted at different times; and viability of development having to
be considered; as a consequence this is reflected in the contributions/obligations
secured which have to be CIL compliant.

Following the receipt of some s106 contributions, initial concept design work has been completed, and feasibility design is due to be commenced. The scheme will be added to Warwickshire County Council's Capital Programme in due course. Further s106 contributions will be paid by the various developers, with land also being provided by some, and section 278 works by others, to deliver the scheme. The s106 contributions are paid when developers reach the development thresholds specified within the s106 agreements. There is no certainty of payment or timescale for payment. When the developers reach those thresholds then payment (with index linking) is made. Therefore, delivery of the scheme (as with most capital schemes funded by multiple s106 contributions) will be reliant on additional funding being identified by the County Council unless we wait for the last s106 contribution to be received.

The total amount secured within completed s106 agreements and other funding towards this scheme totals £3.9M (excl index linking). A further £1.5M is requested as part of this application, and further contributions would be requested from planning applications for the remainder of the EMP7 site, and any other planning applications that may be submitted and are shown to have a severe impact on the junctions.

Exhall and Ash Green Residents Traffic Survey

The traffic survey information provided has been reviewed by our Transport Planning Team. However a number of issues have been noted, and these are similar to those that were fedback in 2019 in response to the 2018 survey information.

For the benefit of the Planning Committee, and to aid understanding, a summary is provided of the traffic data that is being referred to.

The WCC traffic model was updated in 2023 using new survey data collected in March 2023. We have compared the previous model data for this area to the original 2015 model data and have found only minor changes in traffic flow over this period. If the area of network is considered as a cordon, flows entering and exiting the cordon are almost identical (2015 into the cordon 07:00-10:00 8,367 vehicles, 16:00-19:00 8,142 vehicles, 2023 into the cordon 07:00-10:00 7,940 vehicles, 16:00-19:00 8,130 vehicles) and well within the expected daily variation.

The Exhall and Ash Green Residents survey uses analysis in Fig 4 of their report to compare their 2018 and 2023 surveys, the figure does not state what time period is covered by the AM and PM periods, but given the appended survey data it is assumed to be 07:30-09:30 and 15:30-17:30. It should be noted these are not standard survey periods, nevertheless we have provided a comparison to the 2015 and 2023 surveys (see table below).

		Westbound		Eastbound				
		AM	PM	AM	PM	AM W+E total	PM W+E total	AM+PM W+E Total total
	2018	531	478	1008	478	1539	956	2495
Resident Surveys	2023	611	983	749	640	1360	1623	2983
Residents Survey % change		15.1%	105.6%	-25.7%	33.9%	-11.6%	69.8%	19.6%
GEH		3.3	18.7	8.7	6.9	4.7	18.6	9.3
	2015	560	911	858	619	1418	1530	2948
WCC Surveys	2023	608	1093	860	618	1468	1711	3179
WCC Surveys % change		8.6%	20.0%	0.2%	-0.2%	3.5%	11.8%	7.8%
GEH		2.0	5.7	0.1	0.0	1.3	4.5	4.5

The comparison above for 07:30-09:30 and 15:30-17:30 WCC surveys demonstrates a close correlation between the 2015 and 2023 WCC data. It is noted there is a 20% change compared to the 2023 survey on School Lane westbound in the PM period, however when compared to the Exhall and Ash Green Residents survey a total for 2023 for the same movement, this increase falls to 11.2%. Thus, highlighting the importance of daily variation in flows which does occur and the need to consider flows over the wider network, and using other sources of data to corroborate traffic flows. Much of this growth can be accounted for by general background traffic growth over a 9 year period, even when accounting for the pandemic.

Further to this, WCC officers have undertaken statistical analysis on the datasets using a modelling calculation called GEH. This shows that the two WCC datasets are within acceptable tolerances (GEH's of AM 1.3 and PM 4.5), whereas the two Exhall and Ash Green Residents datasets have some significant differences particularly in the PM (GEH's of AM 4.7 and PM 18.6). Given the broad similarity of the two 2023 sets of data, this suggests there are potential issues with the 2018 survey.

It is not clear why the 2018 data is so different from the other surveys collected. However the previous response provided by WCC in 2019 did highlight flaws in the methodology adopted for the surveys. It is also worth noting that WCC always check for roadworks, diversions, incidents and inclement weather conditions which may impact on surveys. The 2018 surveys are not considered to present a valid assessment of traffic flows at the time and show little correlation to the 2015 and 2023 surveys conducted by WCC. Therefore we cannot accept the statement that there has
been 19.56% growth since 2018; based on the same calculation, the WCC surveys shows a moderate 5.6% increase over the 8 year period.

Analysis within the table above, shows the difference in surveys between the Exhall and Ash Green Residents 2018 and 2023 surveys to be an increase in over 105% on School Lane westbound (PM). It seems likely that there may have been some form of disruption on the highway causing less traffic, than under normal conditions, to travel on School Lane during the 2018 survey, or there has been some other error. This is demonstrated by the fact that in the 2015 survey there were 911 vehicles making this movement, there is no obvious explanation as to why this would reduce to 483 in the 2018 survey, to then increase again for the 2023 surveys (both).

However what the data does show is that both sets of 2023 data for the two hour period is broadly similar, and that the WCC 2023 data was used to develop the traffic models used to assess the development impacts.

We would not expect local residents to be able to verify their data in the same way that WCC have to given the additional resources that requires. But it may be helpful to understand that when collecting data to use in a traffic model, WCC will commission further traffic data to be collected to be used to calibrate and validate the model. The WCC 2023 data collection involved the commissioning of video turning counts, ANPR (automatic number plate recognition) data and journey time data collected for the purposes of updating the model. This survey work is commissioned via an independent professional survey company, with the data being corroborated by WCCs in-house survey team using 2023 automatic traffic count data. WCC operate a permit scheme system for those wishing to undertake surveys on the network, these permits should be obtained for any type of traffic survey on WCC network, including those carried out by the Exhall and Ash Green Residents, so that we could have advised on the suitability of survey dates and whether there were any network issues which may impact on the results of the survey.

Development Impact Assessment

With regard to the analysis of development impact, the Exhall and Ash Green Residents report provides calculations for the additional development traffic on the network, but this is based on the Local Plan STA trip rate calculations, and as noted above those are subject to change when the more detailed development proposals come forward in a planning application. Neither does the report evaluate the impact of this traffic and whether it can be accommodated within the network with the inclusion of proposed highway mitigation works, a point that was raised in the previous response to the 2018 survey/report information.

Furthermore to simply adjust demands by scaling the previous strategic trip rate for employment use as adopted in in the 2016 STA is a flawed approach. The land use for the allocated site is currently proposed to change from employment only to include a residential element; more up to date and refined trip generation details for these land uses are now available; and these have been used in the Applicant's Transport Assessment supporting the planning application for the site, and are based on the area of land for each land use type proposed.

Routing within modelling cannot be "assumed" to allow 20% to route away from School Lane. The modelling undertaken to support the Borough Plan review and the development transport assessment uses actual observed distribution data taken from Mobile Network Data and assigned to the network, using the wider area NBWA (Nuneaton and Bedworth Wide Area) model, thus accounting for trip distance and time.

The analysis goes on to state what the level of additional development traffic would be based on these flawed assumptions. It gives no reference to what effect this increased level of traffic would have on the network in terms of delay and takes no account for the highway mitigation proposals which will improve conditions for all transport modes. WCC would not be able to object to a development simply based on the level of traffic generated, as we and NBBC would then be subject to challenge. We could only object to a development based on whether there would be a severe impact in accordance with the NPPF, this would generally be identified through severe impacts on journey times and delay which can then lead to safety concerns. These severe impacts have not been identified with the development assessments for Local Plan allocations in this area, especially as each development is contributing towards the Longford Rd corridor improvements which will mitigate the impacts of these developments.

It is for these reasons that WCC require any significant scale of development to be assessed within the microsimulation model, so that the impacts on the network (including reassignment due to increased congestion) are identified and mitigation identified. The applicant was advised to use the WCC NBWA model to assess both 2031 Reference Case plus development and full Local Plan demands plus development. These results were then extracted and turning movements for signalised junctions were assessed through Linsig (signalised junction modelling software used by WCC's signal engineers). Following the completion of this modelling by the applicant, the updated 2023 Longford Rd corridor model was completed and used by WCC to consider full Local Plan demand to assess the performance of the Local Plan mitigation for the corridor. Neither assessment resulted in outputs which could be classified as severe in terms of NPPF guidance. The Longford Rd corridor model uses 2023 junction data, Automatic Traffic Count data and ANPR data to ensure vehicle routing through the network is accurate, the model was then calibrated against TomTom journey time data to ensure delays are accurately represented. Local Model Validation Reports and Forecast Reports are prepared for each WCC model, should any Members of the Planning Committee or the Exhall and Ash Green Residents Association like further information these can be made available, but please note due to file sizes not all can be shared in an electronic format.

I hope this information is helpful to the Planning Committee and provides assurance that the WCC models are robust and provide a suitable basis for applicants to carry out the necessary assessment of their development proposals. The results presented to WCC as part of a planning submission are then reviewed to ensure that the applicants modelling has been carried out correctly, and that mitigation is identified where required. This information is then included within our planning consultation response to the Local Planning Authority to help inform their determination process.

ADD to Neighbour Responses:

One additional letter of objection was received raising the following additional points:

- the entire of the employment allocation should be houses.
- the employment should be put near the M6 junction at Corley.

Letters of objection were received from Cllr Rob Roze, Cllr Damon Brown and Cllr Tim Jenkins.