



## Comments on Pell Frischmann Technical Note: 103055 Response to Objection from SENSE June 2023.

### Introduction

The Pell Frischmann Technical Note was prepared in response to the SENSE4CSP document 'Review of Transport Assessment' by Ian Barrett. We disagree with parts of this Technical Note, and our comments below must be read in conjunction with it. For ease of reference we have used the same numbering as Pell Frischmann (PF).

### Comments on Pell Frischmann Responses

2.1.2 PF do not comment directly on the inappropriateness of a strategic traffic model to assess traffic impacts on local roads and lanes. In our view this is for three main reasons, each of which is relevant to the paragraphs below:

- a. A strategic traffic model is concerned with the capacity of the strategic road network, and the junctions within it, to cater for traffic volumes now and into the planned future. This is not our primary concern.
- b. A strategic traffic model is vulnerable to errors in coding at the very local level, and cannot adjust for changes in travel behaviour caused by problems in the strategic road network, and specifically its junctions. These are both relevant to our arguments.
- c. A strategic traffic model is focused only on peak-hours travel, with the presumed purposes for travel being commuting to work or school. Our concerns, on the other hand, are about all-day travel volumes with the relevant metric being annual average daily flow (AADF).

PF acknowledge that Misbourne Avenue is not in the strategic model. As this is the most direct route to the strategic road network from two of the three site entrances, and is the route most used by people working on the ES site, this is clearly unacceptable. It is pure nonsense to claim that this failure makes the model more robust, and of course it precluded assessment of the junction of Misbourne Avenue with the A413. Local knowledge shows this to be problematic even at current traffic volumes, partly because of its gradient (especially in winter), and is consequently avoided by many people at peak times. Misbourne Avenue itself is of limited width, particularly at its two bends, with these and its approaches now being double-yellow lined to preclude any parked cars.

Gorelands Lane has no centre line from its junction with Kings Road through to the county boundary and its continuation as Chalfont Road; this means that it generally has a width of less than 5.0m. Whilst there is reasonable width between its junction with Deadhearn Lane through to the Newland Park entrance, the section between Kings Road and the junction with Deadhearn Lane is single-track and marked as unsuitable for HGVs. Beyond Newland Park there are numerous choke-points, and edge erosion is visible all along this stretch. Whilst the development would not generate much HGV movement other than during construction (see below), such movements already exist (for the businesses along the lane, and waste collection) as well as numerous LDVs which PF have classified as HGVs so as to present worst case scenarios. Such conflicts would greatly increase with the volume of car movements generated by the proposed development.

- 2.1.3 For the reasons given in the above sections, we do not believe that the capacity of links in relation to their safety of operation is appropriately built into the model. It has been Council policy to restrict traffic on local lanes accordingly, and we have gathered photographic and video evidence to support that view even at current traffic volumes.

We need to see the Construction Logistics Plan to confirm or otherwise its overall fitness for purpose. Align (the contractors for the HS2 CSP vent-shaft construction) concluded that Chesham Lane was not suitable for this purpose and therefore obtained permission to construct a new link road direct to the A413. Construction traffic for Newland Park caused problems in Chesham Lane, particularly at the Cricketfield Cottages bends, and the impact is still visible. Some construction traffic for Newland Park also came from Hertfordshire, and was totally inappropriate for Chalfont Road and Gorelands Lane.

It is pure nonsense to claim that the existing issues of the local lanes have been shown not to be significantly impacted by the development proposals. The problems are serious even at current traffic volumes, to which the volumes arising from committed developments (Newland Park and its Leisure Facility) needed to be added. The proposed development would add very significantly to these as the lanes are the main means of access for residents to Little Chalfont and Amersham and to the M25 and NW London.

Capacities of roundabouts are routinely affected by exit constraints. In this particular case, buses cannot easily exit the roundabout into the High Street when there is queuing traffic in the opposite lane and there can be tail-backs from the pedestrian-crossing in the High Street and its junction with Market Place. Northbound traffic on the A413 is reduced from two lanes to one just north of the roundabout, and regularly tails back accordingly.

- 2.1.4 It is claimed that all committed developments including Newland Park have been included in the model. However the Do Minimum case shows traffic volumes significantly lower than those in the Newland Park planning application. Further, there is no traffic shown for the Leisure Facility which is expected to generate some 1,400 vehicle movements per day and will use an access onto Gorelands Lane currently shown with no peak traffic. As such, there must be doubt as to the accuracy of this statement.

The traffic model may have been approved for use by Buckinghamshire County Council, but it failed its validation test on the section of the A413 relevant to the application; as noted earlier, the model also failed to include Misbourne Avenue. We would argue that these two issues are directly connected, and therefore that local conclusions drawn from the model are not secure. It is not relevant whether or not the model was tested in the Little Chalfont planning application, as their impacts barely overlap as shown by the sensitivity test that was conducted and submitted separately. A competent planner would be expected to have identified this problem, and adjusted his findings accordingly.

- 2.1.5 Yes, it is normal for some areas of a strategic model to calibrate better than others. That is the purpose of the validation process, and any failures found there should result in a further iteration of the calibration or a re-check of the underlying assumptions. Clearly that wasn't done, and therefore it isn't fit for purpose in assessing local traffic in the immediate vicinity of the application site.

We are not aware of specific speed surveys on relevant sections of Gorelands Lane, but our comments stand. Queue lengths on Rickmansworth Lane at its junction with the A413 have reduced, though, as a result of 'working from home' since the Covid pandemic; however we expect that travel situation to return to normal over time.

- 2.1.6 As noted above, there is doubt as to the accuracy of this statement.



- 2.1.7 Unexpected consequences of loading a traffic model with projected travel demand from a new development normally arise from some flaws in the calibration process; these are not normally significant at the strategic level, but can be at the local level and so further reduce confidence in the security of its findings.

Heavy-vehicle construction traffic may well fall outside of peak hours, but the travel of site workers may not. In any case, it is the all-day flows of traffic on local roads and lanes that is our concern not just the peak hours. Without sight of the Construction Logistics Plan, it is not possible to comment on this.

PF claim that the nature of the strategic model is such that it has the ability to redistribute traffic to reflect likely changes in travel patterns associated with increases in demand for certain links within the model. That has the implication that certain links have limitations in their capacity, but PF have refuted our claim in that regard. Both positions cannot hold at the same time.

PF also fail to address the problem that significant changes shown in the traffic flows into and out of key junctions do not equate, whereas as clearly they should. Further, changes in these flows are shown to dissipate sooner than they possibly could. This then casts extreme doubt on the security of the findings presented.

In any case, as argued regularly above, we do not consider the appropriateness of the model in assessing strategic implications across the network as being wholly relevant in assessing the very local impacts immediately surrounding the proposed development and the metrics used for that purpose.

- 2.1.8 As no Construction Logistics Plan is presented, it is not possible to comment on this. PF claim that the majority of construction traffic would be outside of peak hours and therefore would not affect the strategic modelling. However it will very clearly affect local traffic throughout the day, and that is our concern – especially as construction is expected to last for 8.7 years.

- 2.1.9 It is our understanding that the proposed development will make provision for a primary school rather than actually provide one. Clearly such a school would need to attract pupils from outside the development in order to be viable, and many of these would be dropped off by car. This may not affect the main highway network, but will affect the local roads that are our concern. The parking provision for pupil drop-off and pick-up shown in the projected master plan appears inadequate, and overflow would therefore impact on the local roads and side-streets.

Public transport provision in Chalfont Common is already inadequate and not commercially viable. Routing services through the proposed development would not attract significant extra patronage and would reduce their attraction to current riders. No provision for public transport is made in the projected master plan.

- 2.1.10 Our main concern is not with pedestrian severance but rather with pedestrian amenity. For example, no mitigation is proposed to link the two site entrances on Chesham Lane to the footpaths down to Chalfont St Giles that are important to local residents.

PF state that a full multi-modal environment study will be undertaken to identify any areas within the existing highway network where the pedestrian environment can be improved, but don't indicate who will fund such a study, when it might report, and who will then fund any mitigation measures arising. By nature of the hedgerow boundaries to the local highway network, such mitigation would necessarily be expensive and come at its own environmental cost.

- 2.1.11 As shown immediately above, any cycle infrastructure development would necessarily be very expensive to implement in the direction of Chalfont & Latimer station. Cycle access to Gerrards Cross station is made unattractive by the steep hills down to and up from the Misbourne Valley.

2.1.12 Whilst the parking provision may have been discussed in detail with highways officers at BCC, and agreed as being appropriate, it certainly hasn't with the Landscape, Architecture and Urban Development team. The latter argue, in a separate submission, that insufficient provision is made in the master plan to support the scale of the proposed development. We agree with their findings.

Of particular concern to us is also that the proposed development lies in a location with some of the highest ratios of car ownership to households in the country. This is unlikely to change given the isolation of the site in public transport terms, and that is recognised in the Travel Plan. Given the consequent need for off-street parking provision for the charging of several electric cars for each household, the design concepts espoused in the master plan are clearly not sustainable.

2.1.13 For all the reasons given above, we totally reject the final conclusions of the Pell Frischmann response to our original submission and therefore declare that this still stands unaltered.

  
SENSE4CSP

8 May 2024

