

Your Ref: DC/15/2424/OUT
Our Ref: 570\CON\3920\15
Date: 21 January 2016
Highways Enquiries to: colin.bird@suffolk.gov.uk



All planning enquiries should be sent to the Local Planning Authority.
Email: planning.help@westsuffolk.gov.uk

The Planning Officer
St Edmundsbury Borough Council
West Suffolk House
Western Way
Bury St Edmunds
Suffolk
IP33 3YU

For the Attention of: Chris Rand

Dear Chris

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN DC/15/2424/OUT**

PROPOSAL: Outline Planning Application (Means of Access to be considered) - Cross Boundary Application - creation of up to 46,000 sq m of floor space for uses within B1,B2 and B8 of the Use Classes Order, road side uses (petrol filling station and restaurant/s, Use Class (A3/A5), car dealerships(sui generis), ancillary lorry park for Business Park occupiers, together with landscaping, car and HGV parking and associated works and facilities including access.

LOCATION: Land At Haverhill Business Park, Bumpstead Road, Haverhill

ROAD CLASS:

Notice is hereby given that the County Council as Highway Authority make the following comments:

I have reviewed the Transport Assessment (TA) which considers the effect of the proposed development on the existing highway infrastructure and although I have some issues with the modelling scenarios used I accept that the road network is unlikely to result in significant congestion or safety problems on the highway, with the exception of the parking issue below.

While the application is outline, considering matters of access only, I note that both the Indicative Framework Plan 15016/TP/004 and Indicative Masterplan 15015/SK/028 (Appendix A of the TA) show the existing section of Bumpstead Road between Phoenix Road and Helions Bumpstead Road being widened to approximately 12m with new footways along the western side. There is no mention of this proposal in the TA and I assume it is a mistake but this should be clarified.

There are significant parking issues caused by HGVs on Icen Way resulting in congestion and damage to the carriageway and footway and which will result in problems accessing the proposed new development. There is no analysis in the TA of whether these vehicles are associated with existing businesses and the TA mentions a possible lorry park in paragraph 4.13 which may help address this existing issue however, there is no guarantee that this proposal will be progressed as part of the application. Consequently we cannot be assured that parking problems on Icen Way will not be exacerbated and affect safety on the highway.

The lorry park is not shown on the masterplan and further information is required so that we can be assured it is deliverable and will resolve the issue of parking on Icen Way.

Sustainable links to the site are unsatisfactory and should be improved as follows;

- There should be a shared use cycle path along Icen Way with a connection to the existing route on the west side of Bumstead Road
- A link should be provided to footpath 13 to provide a shorter route for pedestrians to access the east end of Icen Way subject to the restrictions in working in the vicinity of a Right of Way as stated in the consultation response dated 29 December 2015
- Measures to improve bus provision in the area – see comments on Travel Plan below
- Missing sections of footway on the east side of Bumstead Road are required between the north end of the existing footway and 37 Bumstead Road and between Saguenay and Rivington with a crossing point either side of Bumstead Road outside Thistledown.

Comments from our Travel Plan Officer, Chris Ward, are included below

“I have had a chance to review the Workplace Framework Travel Plan (dated November 2015) that was submitted to support the proposed application (DC/15/2424/OUT) for a business park off Bumstead Road in Haverhill and would like to provide the following response.

The travel plan document itself is very generic and unspecific, which does not include any decent site specific measures or an interim target to reduce single-occupancy vehicle travel to and from the site. A suitable interim modal shift target is to achieve a 15% reduction of single-occupancy vehicle travel. The background information section should be expanded to include some 2011 Census ‘origin-destination’ data from the Nomis website to identify where employees are likely to travel to the site from and the estimated number of employees that will work on the completed development. This can help identify some site-specific objectives, targets and measures that will reduce the vehicular impact this site is likely to have on the existing highway network.

The travel plan also disregards any measures to promote and improve the bus services that serve the site. A revised travel plan must include some evidence that the local public transport operators have been consulted in regards to providing an improved bus service to the site. It might also be worth consulting the workplaces at the existing business park that are in close proximity to the proposed development to secure an improved bus service to and from the site, as the Planning Practice Guidance does recommend travel planning outside of the developments boundary. Measures to promote public transport are important as not all staff can walk or cycle to the site, in addition to some car sharing opportunities not being suitable to some employees on the site. This may then only leave the option of travelling to the site by single-occupancy vehicle which will have more of an impact on the local highway infrastructure. Evidence of the attempts to secure bus service improvements must be included in a revised travel plan. Further measures such as the provision of high quality bus waiting facilities should be provided across the site if improved bus services can be secured through the travel plan. There should be some further measures identified in the travel plan to provide high quality cycle facilities across the site. This should involve the provision of secure, covered and lockable cycle storage, in addition to showers, changing and storage facilities for staff that wish to cycle to the site. Also there must be suitable short-stay cycle parking for visitors that may wish to access the site by bicycle. The implementation of an on-site car club should also be investigated by contacting local car club operators to reduce the need for staff to bring their own vehicles to carry out their duties. Evidence of the discussions with the car club operators must also be included in the revised travel

plan. Also if the travel plan targets are not achieved there must be some remedial measures identified to help achieve this target.

Finally to ensure the travel plan is properly coordinated and implemented across all units on the site a Transport Management Association (TMA) must be set up. The TMA must be fully funded by the developer from first implementation until five years after the final unit has been occupied. The TMA will be fully responsible for coordinating the annual travel plan monitoring, which must commence six months after the first unit is occupied and continue until five years have passed after the final unit has been occupied. The requirement for the TMA will be secured through a Section 106 obligation.

Further inspiration for workplace travel plan measures can be found in the DFT Essential Guide to Travel Planning that can be found with further Suffolk Travel Plan guidance through the web link below:

<http://www.greensuffolk.org/travel/travel-plan-support/developer-support/>

I would require the applicant to submit this revised travel plan that has taken into account the issues raised above prior to the determination of the application.

The requirement for a Travel Plan is supported by National Planning Policy Framework paragraph 32, which sets out that plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;**
- safe and suitable access to the site can be achieved for all people.**
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.**

Other relevant paragraphs include 34, 35, and 36.

In addition, a decent quality travel plan will also support policies CS7 and CS8 of the St Edmundsbury Core Strategy and policies DM4, DM33, DM45 and DM46 of the Forest Heath and St Edmundsbury Local Plan - Joint development management policies document.

I would also require the following Section 106 contributions:

- Travel Plan Evaluation and Support Contribution - £1,000 per annum until five years have passed after occupation of the commercial unit. This is to cover Suffolk County Council officer time working with the Travel Plan Coordinator and agreeing new targets and objectives throughout the full duration of the travel plan**

I would also require the following Section 106 obligations to secure the travel plan and its measures:

- Implementation of the Workplace Travel Plan**
- Implementation of a Transport Management Association**
- Provision of an approved welcome pack to each employee on occupation**
- Provision of electric vehicle charging infrastructure**
- Provision of an on-site car club**

Full wording and CIL justification for the proposed obligations and planning condition can be provided by myself at a later date.

Further detailed comments in regards what work needs to be done to bring the travel plan to an acceptable standard can be provided on request of the applicant.”

In conclusion, although some of the above issues can be dealt with by condition we require further information with regard to the apparent error on the masterplan, information on how the application will prevent existing parking issues on Icen Way and a revised Travel Plan in accordance with the above comments before we can support this application.

Yours sincerely,

Mr Colin Bird
Development Management Engineer
Strategic Development – Resource Management