

Mid Devon Local Plan Review 2013 – 2033: Examination

Hearing 1: Policy J27

Introduction

- 10.1. This statement has been prepared by WSP on behalf of Friends Life Limited to respond to questions raised by the Inspector as part of the Mid Devon Local Plan Review (2013 – 2033) Examination. This statement responds to Matter Policy J27, Issue 10 as set out in the Inspector's Matters and Issues Note (ID02). Issue 10 relates to Highways and Transportation matters, specifically:

Q) Does the evidence base lead to the conclusion that the impact on M5 Junction 27 can be properly managed?

- 10.2. This response to the Inspector's question (issue) is made in the context of the proposed allocation of land for an exceptional tourism and leisure led development east of M5 Junction 27. In transport terms, the allocation proposals are aligned to the development scheme (known as Eden Westwood) being promoted by Friends Life Limited and the Eden Project. However, for the avoidance of doubt, the information contained within this statement and associated Statement of Common Ground (SoCG), including references to 'Eden Westwood', relate to the allocation proposals as set out in Policy J27 of the Mid Devon Local Plan Review. The transport evidence is a product of a comprehensive process that has evolved over time where the scheme and the promotional strategy have responded to changing circumstances.
- 10.3. In early 2016 Friends Life Limited entered into a Planning Performance Agreement (PPA) with Mid Devon District Council in relation to the preparation, submission and determination of a potential outline planning application for the Eden Westwood scheme with an intention that the evidence would be sufficient to support both an application and a Local Plan allocation; at this time the site did not form a draft allocation. The pre application process included a series of meetings with Mid Devon District Council (MDDC), Devon County Council (DCC) and Highways England (HE) to work collaboratively in preparing an application that met the requirements of all parties.
- 10.4. As a result of those meetings a comprehensive Transport Assessment (TA) has been prepared by WSP, on behalf of Friends Life Limited, to assess the Highway and Transportation impacts of the proposed Eden Westwood development at M5 Junction 27. The TA forms part of the evidence base for the draft policy.
- 10.5. As a consequence of this process, the evidence base that has been developed demonstrates that the impact on M5 Junction 27 can be properly managed. This is explained in more detail within the (Issue 10) SoCG that has been prepared and submitted to the Inspector. In the interests of brevity; the content of the SoCG is not replicated within this statement.
- 10.6. Whilst it has been agreed between the signatories to the Statement of Common Ground that the impact can be properly managed for the reasons that document explains, this Hearing Statement outlines the view of Friends Life Limited on the scale and extent of the required mitigation strategy. It also identifies how and to what extent this potentially differs from the views of DCC and HE. These

differing views relate specifically to a number of the Trip Generation Assumptions detailed within the Transport Assessment, and the proposed access to Tiverton Parkway Railway Station.

10.7. Trip Generation Assumptions

- 10.8. Due to the sui-generis nature of the proposed Eden Westwood development, a traditional trip generation approach was deemed to be inappropriate. The national TRICS (trip generation) database lacks sufficient comparable sites to have confidence in its outputs. As such, a bespoke first principles methodology was developed. This calculated anticipated trip numbers based on estimates in visitor numbers and full time equivalent jobs on site.
- 10.9. For parity with the other aspects of the planning application, the trip generation calculations link directly to the other supporting documents where appropriate. These include:
- Estimate of Footfall, undertaken by CBRE;
 - Leisure Impact Assessment, undertaken by Colliers International; and
 - Retail Impact Assessment, undertaken by CBRE.
- 10.10. The assumptions which underpin this methodology are key in determining the overall vehicular trip generation and thus impacts during the peak periods. These assumptions have been clearly documented in the TA and all supporting technical information and discussed at the Planning Performance Agreement meetings between all parties.
- 10.11. Post submission of the TA, DCC and HE asked for further consideration to be given to the sensitivity of the assumptions which had been applied. Each assumption can have an effect on the final trip generation number. Therefore, it was agreed to undertake further analysis to identify the variability in the assumptions and to generate a lower and higher trip number scenario for the agreed time periods. The lower trip number (best-case) scenario was generated for the sake of completeness but was not taken forward for more detailed modelling. The further analysis for the higher trip generation scenario used an alternate set of assumptions that resulted in increased vehicular demand for the site, and considered whether the impacts could still be properly managed at M5 Junction 27. Traffic modelling was undertaken and demonstrated that whether using the trip generation scenario adopted in the TA, or the alternative higher trip generation scenario proposed by DCC, mitigation measures could be implemented to ensure that the impact on M5 Junction 27 is properly managed. The scale of mitigation required for these two scenarios (core and high scenarios) differs, as explained in the Statement of Common Ground and associated drawings, but the impacts can satisfactorily be mitigated under either scenario.
- 10.12. WSP firmly believe that the scenario used for the purposes of determining the likely trip generation within the TA represents a robust and in many cases a worst case assessment. The assumptions which have been applied with respect to pass by trips, mode split, vehicle occupancies, staff shift patterns represent a worst case scenario with respect to highway impacts for the majority of assumptions. The higher trip generation scenario undertaken for the sensitivity test assumes a worst case assessment for all assumptions, including uplift the visitor numbers beyond that defined in the other support documents outlined herein. The high scenario which was modelled for the sensitivity assessment considered a 30% uplift to annual traffic associated with the development. The detail of this assessment is presented in Technical Note 07 – Follow-up response to meeting on 14 Feb 2017, dated 06 March 2017.
- 10.13. During the pre-application discussion, Mid Devon District Council supplied the 'Scotch Corner Designer Outlet Centre, Scotch Corner A1 – A66 Transport Assessment' as a comparator for trip generation used in the assessments to date. The Transport Assessment for Scotch Corner used traffic

survey data from the Swindon Designer Outlet Centre collected in 2014 to validate the proposed trip generation.

	Scotch Corner			Swindon			Eden Westwood TA Scenario			Eden Westwood Higher Trip Generation Scenario		
Site Details	c. 173,000 sqft of retail floor space			c. 215,000 sqft of retail floor space			170,000 sqft of retail plus tourism and leisure elements (CBRE estimate 75.9% of visitor footfall is associated with the Designer Outlet Centre)			170,000 sqft of retail plus tourism and leisure elements (CBRE estimate 75.9% of visitor footfall is associated with the Designer Outlet Centre)		
	Arrive	Depart	Two-way	Arrive	Depart	Two-way	Arrive	Depart	Two-way	Arrive	Depart	Two-way
Morning Peak	21	12	33	156	9	165	166	22	188	181	22	203
Evening Peak	101	253	354	139	238	377	354	488	842	475	639	1,114
Saturday Peak	569	501	1,070	476	563	1,039	721	631	1,352	955	862	1,817

10.14. As can be seen from the information provided, the trip generation numbers outlined in the Draft Eden Westwood Transport Assessment are more consistent with both the Scotch Corner Transport Assessment and the traffic surveys undertaken at the Swindon Designer Outlet Centre than the higher trip generation scenario.

10.15. Access to Tiverton Parkway Railway Station

10.16. At the scoping meeting on 15 February 2016, WSP discussed the potential for connecting the site to Tiverton Parkway Railway Station with a dedicated shuttle bus. The proposed shuttle, which would be funded by the development, would ensure a safe and convenient means for rail passengers to cross M5 Junction 27 and access the development. All parties to the PPA agreed that at grade pedestrian crossing facilities on M5 Junction 27 would not provide a safe or satisfactory solution.

10.17. It was agreed that if the proposals included a shuttle bus between Tiverton Parkway Railway Station and the site, the impact of the bus trips would need to be modelled explicitly as part of the TA. The TA has demonstrated that the additional traffic resulting from the use of a shuttle bus service does not have adverse impacts upon network capacity. An analysis of potential demand has identified that a small bus operating 4 services hourly during the peak should be sufficient to cope with anticipated demand.

10.18. HE and DCC believe that a pedestrian / cycle footbridge is necessary to provide this linkage, however WSP believe that there is more than one way in which the underlying objectives could be met, including the free shuttle bus, and it is therefore not necessary or desirable to be prescriptive at this stage.

10.19. The TA considered the catchment areas for staff and visitors who could potentially walk or cycle to the site. The walking and cycling isochrones plots from Appendix I of the TA have been appended to this statement. The plots show that few residential dwellings to the west of the M5 are within walking distance of the site and therefore the pedestrian demand for a footbridge would be primarily linked to rail passengers. Local residents who do not wish to drive could walk to Tiverton Parkway and use the shuttle bus to cross the motorway. If an intermediate stop was included on Lower Town road, between Tiverton Parkway and the site, this would reduce pedestrian walking distances further. The exact

demand for the bus and any requirement for intermediate stop points can be determined at the application stage.

- 10.20. It is also important to consider that the walking distance from Tiverton Parkway to the centre of the site via a footbridge is approximately 550+ metres. This may be a less attractive proposal to many than a bus which could provide door to door connections. A shuttle bus has the potential to provide a more practical all weather solution for pedestrians who may be carrying shopping, those with reduced mobility or those with pushchairs. The Chartered Institution of Highways and Transportation (CIHT) publication 'Designing for Walking', published March 2015, states that *"in general, changes in level should be avoided, but when a difference in level is inevitable, the needs of people with reduced mobility must be considered"*. As such, a fully accessible shuttle bus service is likely to provide a more inclusive solution.
- 10.21. Analysis of the cycling isochrones indicates that residents of Sampford Peverell, Ayshford, Whitnage, Westleigh, Halberton and other surrounding villages are within cycling distance of the proposed site. For Sampford Peverell, Ayshford and Whitnage this distance is based on utilising the existing cycle route through Tiverton Parkway and associated overbridge approximately 975m south of Junction 27. For Halberton, cyclists would utilise a route through the northern boundary of Willand and for Westleigh cyclists would utilise an existing overbridge to the north. All routes would provide convenient access for cyclists within a 30 minute timeframe. There are a number of settlements to the east of the M5 within cycling distance and the development will be fully accessible to cyclists from these locations.
- 10.22. A location plan has been included within Appendix A to show the route of the proposed shuttle bus service, existing pedestrian footbridge and a potential new footbridge.
- 10.23. It should be noted that the TA does not assume that any staff or visitors walk or cycle to the site. In reality, it is accepted that many local residents from towns to the east of the M5 may choose to walk and cycle, thus reducing the impact on the local highway network from that which has been modelled.
- 10.24. Conclusion**
- 10.25. The Transport Assessment prepared by WSP on behalf of Friends Life Limited has fully assessed the impacts of the proposed development and demonstrates that the impact on M5 Junction 27 can be properly managed. The approach and assessment methodology is detailed in the joint Statement of Common Ground.
- 10.26. Where the views of the developer differ from those of DCC and HE, it is agreed between the parties that this does not affect the conclusion that the impact on M5 Junction 27 can be properly managed. The difference in views relate only to the modelling scenario and associated mitigation strategy that should be pursued at the application stage. All parties agree that there are deliverable mitigation strategies for both scenarios. The differences between the resultant mitigation strategies are outlined in the joint Statement of Common Ground and these have been underpinned by extensive technical work. It is not necessary for these differences to be resolved in order to determine whether the proposed allocation should be included in the plan, or what it should provide for in terms of mitigation. They are therefore matters appropriately left to be resolved between the parties through the development control process.
- 10.27. A technical analysis has been undertaken to assess the demand for a potential new pedestrian footbridge to connect the site to Tiverton Parkway Railway Station and provide more direct pedestrian and cycle links across M5 Junction 27. The analysis has demonstrated that the demand for this bridge would be almost wholly rail passengers who could in many ways better be served by a direct regular shuttle bus service which would be funded by the developer. In this regard, FLL does not dispute the need for improved connectivity between Tiverton Parkway and the site; however, there are alternative, more cost-effective measures for achieving this objective and this flexibility should be captured within

the policy wording rather than having an explicit requirement for new pedestrian/cycle bridge across the M5 Motorway.

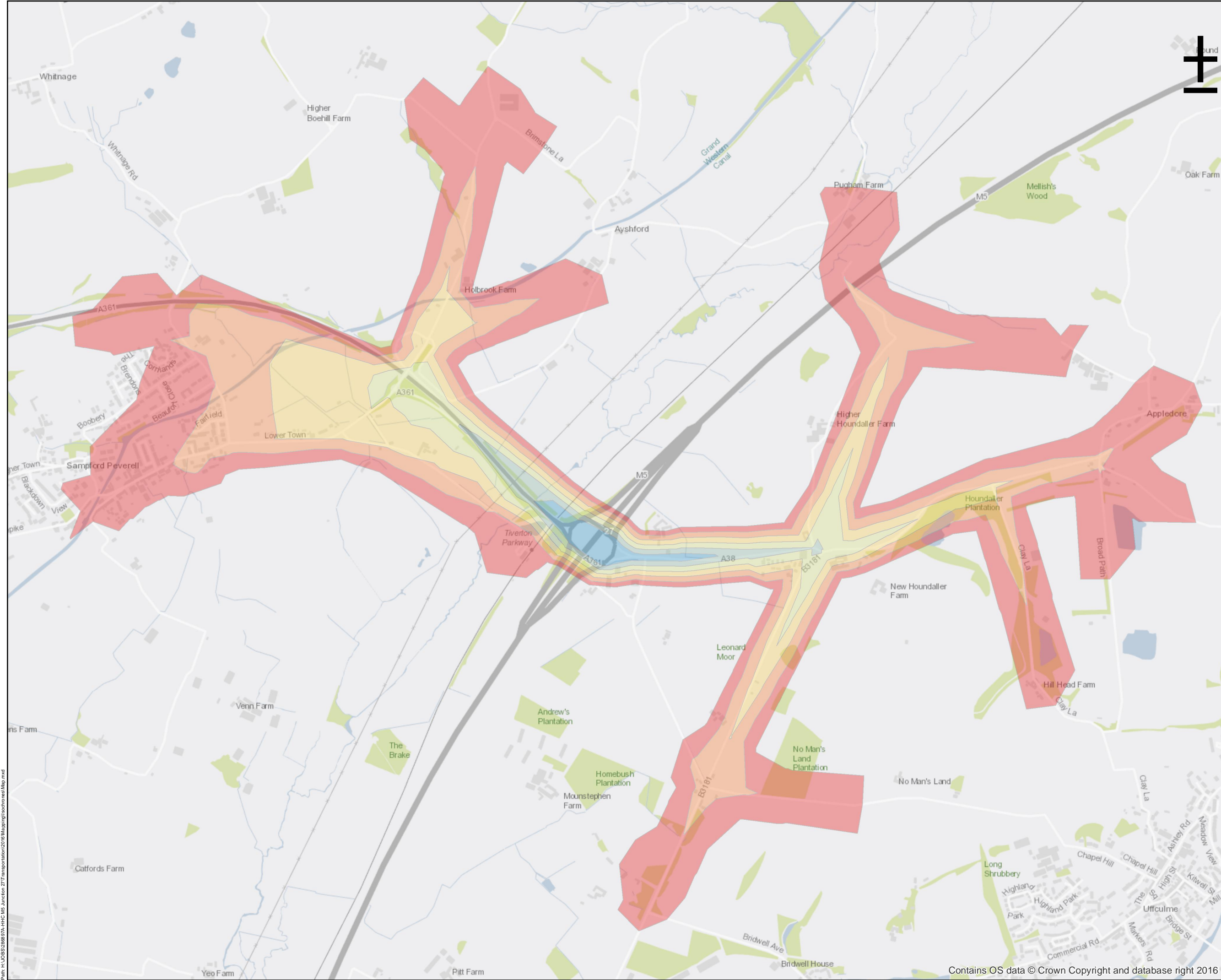
APPENDIX 10A - Accessibility to Tiverton Parkway Railway Station

Appendix I

ACCESS BY WALKING OR CYCLING

APPENDIX I-1

WALKING ISOCHRONES



THIS DRAWING MAY BE USED ONLY FOR THE PURPOSE INTENDED AND ONLY WRITTEN DIMENSIONS SHALL BE USED

Notes

Legend

M5 J27 Walking Isochrones

	0-5mins
	5-10mins
	10-15mins
	15-20mins
	20-25mins
	25-30mins

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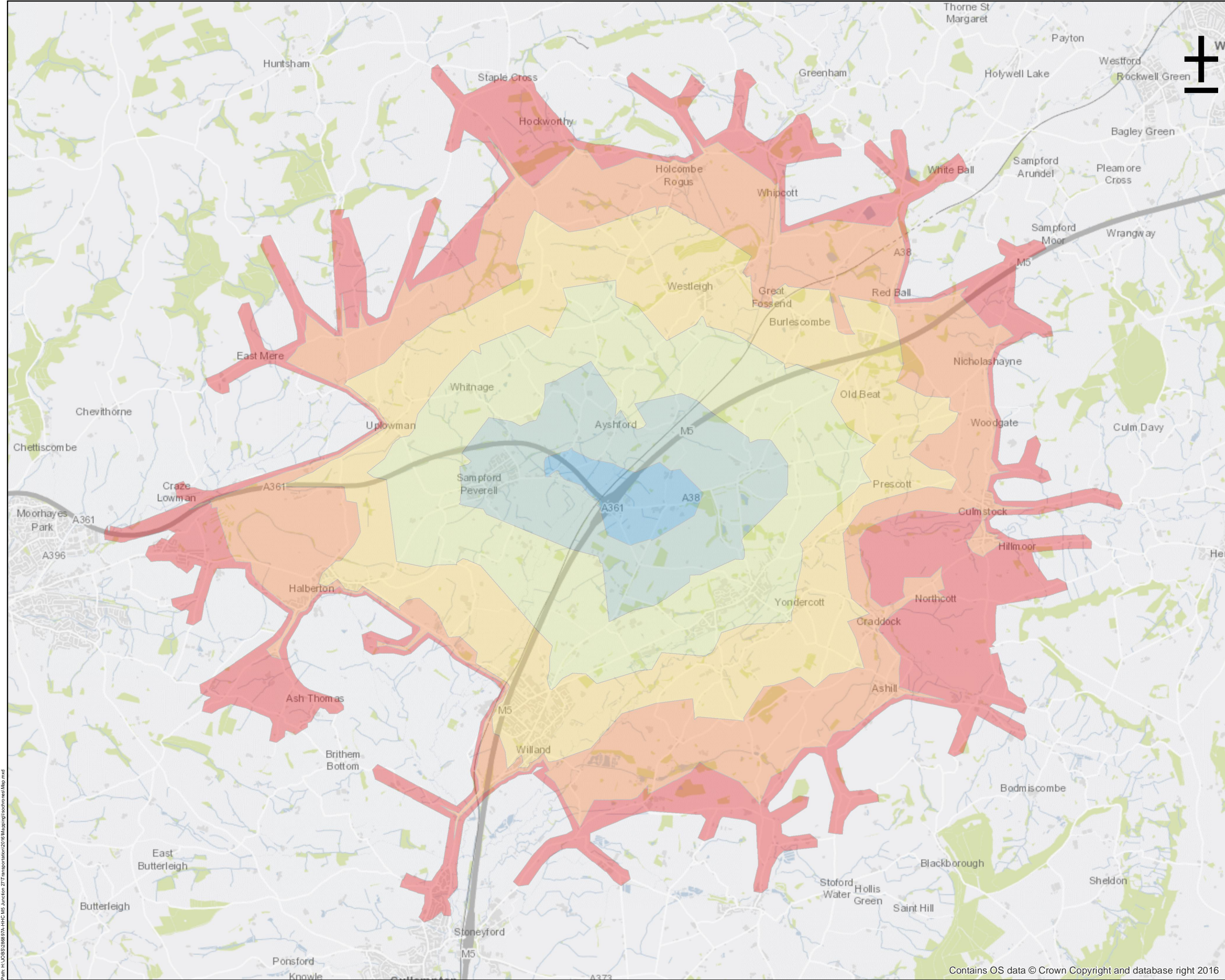
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Drawing Status			
FINAL			
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Walking Isochrones			
Eden Westwood			
Scale at A3			
1:12,500			
Drawn		S. Hayward	
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Drawing Number			
Rev			

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Tel: 02920 769200

APPENDIX I-2

CYCLING ISOCHRONES



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Notes

Legend

M5 J27 Cycling Isochrones

- 0-5mins
- 5-10mins
- 10-15mins
- 15-20mins
- 20-25mins
- 25-30mins

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Drawing Title

Cycling Isochrones

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