MEADOW LANE, IFFLEY

TA TECHNICAL AUDIT

PROJECT NO. 4989-2001 DOC NO. TN02

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CLIENT: FRIENDS OF IFFLEY VILLAGE

Velocity Transport Planning Ltd

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1 INTRODUCTION

1.1.1 Velocity Transport Planning (VTP) has been appointed by the Friends of Iffley Village, a local organisation established to protect the heritage and Conservation Area of Iffley, to undertake a Technical Audit of the Transport Assessment (TA) dated December 2022 that has been prepared by Ridge and Partners LLP. The TA has been prepared for a planning application (reference: 22/03078/FUL) of 32 residential dwellings on the site referred to as *Land bounded by Meadow Lane and Church Way, Oxford, Oxfordshire, OX4 4ED*, herein referred to as the Site.

1.1.2 The local planning authority is Oxford City Council (The City), and the local highway authority is Oxfordshire County Council (The County).

1.2 OVERVIEW

1.2.1 This document has been prepared to undertake a Technical Audit of the TA as a whole with comments provided under relevant subject matters rather than attempting to provide direct comments on each section of the TA due to the crossover of topics within it. We have therefore broken our Audit down into the following subject matters:

- Accessibility
- Equestrian access
- Highway network
- Accident data
- Site access
- Parking
- Impact assessment
- Summary, policy context & conclusion

2 AUDIT OF TRANSPORT ASSESSMENT

2.1 ACCESSIBILITY

WALKING AND CYCLING

2.1.1 The TA notes that the Site lies to the west of two Public Rights of Way (PRoWs), numbers 320/19/10 which runs along Tree Lane and 320/106/10 which links Church Way with Cordrey Green. These PRoWs head east from Church Way towards Woodhouse Way and, other than allowing residents to walk along them, do not present much strategic value in terms of accessing local amenities and facilities.

2.1.2 PRoW 320/107/10 is claimed to provide access to Oxford City Centre. However, this route lies to the west of the River Thames and is accessed via Donnington Bridge (B4495) circa 600m to the north of the Site. This PRoW is only realistically useable for certain times of the day and year due to short daylight hours and variable surface conditions, and generally with no lighting or passive surveillance, and therefore cannot be relied upon to provide a realistic walking route to Oxford City Centre for most people.

2.1.3 The TA states that the Site lies to the south of Oxford City quiet Cycle Route 6, which connects the City Centre to Littlemore and Blackbird Leys. Oxford City Centre is quoted as being approximately 3km from the Site, which equates to 12m cycling time. However, as previously noted, this route is via PRoW 320/107/10 and is only realistically useable during certain times of the day and at certain times of the year due to short daylight hours and variable surface conditions, and generally with no lighting or passive surveillance.

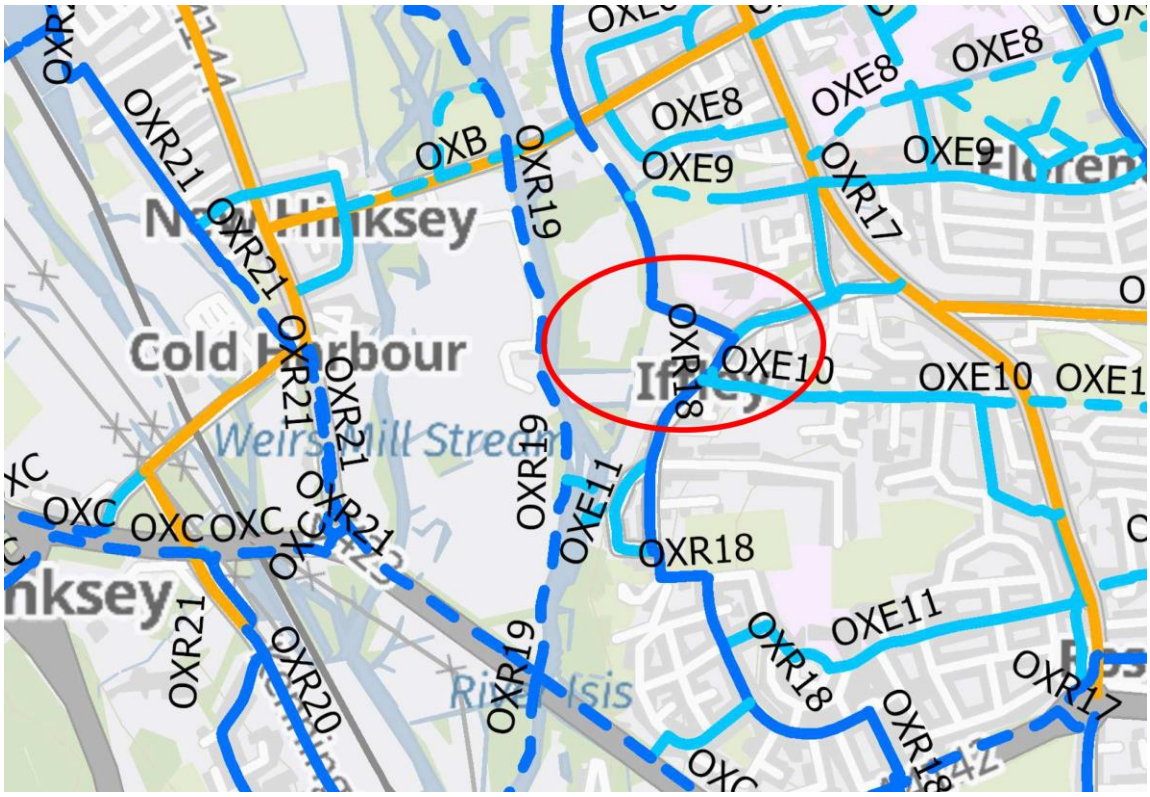
2.1.4 With regards to cycling, the TA states that National Cycle Route (NCR) 5 runs along the River Thames east of the Site and connects at Donnington Bridge (B4495) north west of the Site, approximately 700m from the Site. NCR 5 is a long-distance route from Reading to North Wales. It connects the Site to Oxford and Banbury to the north and Didcot and Reading to the south. Due to the physical barrier created by the river, this route is only accessible as stated from Donnington Bridge (B4495), which results in the route following PRoW 320/107/10

2.1.5 The TA states in Table 3: Distance of core amenities from proposed development, the walking and cycling distance the Site is from core amenities. However, the table is light in terms of the number and range of amenities that are within walking and cycling distance.

2.1.6 Notably, the TA fails to acknowledge the presence of Oxfordshire County Council's Quiet Route OXR18 which runs past the site on Church Way and Meadow Lane. This route provides a key pedestrian, cycle and equestrian route used by residents and visitors for commuting and recreation activities. The route is shown in **Figure 2-1**, with the site circled in red. There is no analysis within the TA on how the proposed development will impact upon the amenity of pedestrian, cycle and equestrian access on the route and as a result, the safety implication of the proposed development on OXR18 have not been assessed or mitigation proposed.

2.1.7 It is considered that, as described further on within this report that the increased traffic associated with the proposed development and overspill parking associated with it, will impact on the pedestrian, cycle and equestrian amenity from a capacity and highways safety perspective, the latter of which contravenes paragraph 111 of the NPPF.

Figure 2-1: Location of Oxfordshire County Council Quiet Route OXR18 in relation to site



PUBLIC TRANSPORT

2.1.8 The TA states that the nearest bus stop is located 610m walk distance from the Site. The Chartered Institute of Highways & Transportation (CIHT) '*Guidelines for planning for public transport in developments*' (1999) suggests that the maximum walking distance to bus stops from a new development should be no more than 400m.

2.1.9 As the site is an allocated site, a review of the Sustainability Appraisal and Strategic Environmental Assessment (SA&SEA) published in September 2018 that supported the OCC Local Plan 2036 identified that the Meadow Lane Site (then identified as Site SP43) scored positively in relation to vehicle access (+), positively in relation to walking and cycling (+), very positively in relation to access to bus services (++), and negatively in relation to access to rail services (-). The conclusion from the SA&SEA was that "*the site generally scores well against sustainability criteria and should continue on to the stage 3 assessment*."

2.1.10 Access to the local bus stops is beyond the 400m walking distance set out by the CIHT and that set in the Local Plan Policy M3, and therefore this may not make bus utilisation as attractive as suggested. It is therefore considered that the SA&SEA should not have scored this as a positive due to the fact that the identified proximity to a bus stop is incorrect, and the walking distance is only considered to be acceptable.

2.1.11 The TA also states the nearest rail station is Oxford Station, 4.5km away. Whilst it is stated that Oxford Station can be accessed by bus in 16 minutes, this time does not account for the walk time to the bus stop, and therefore the journey is more likely to be in the order of 30 minutes as confirmed by Google Journey Planner. Further, taking a bus to Oxford Station from the nearest bus stop involves changing buses.

2.1.12 The TA states that Oxford Station can be accessed by cycle in 12 minutes. However, there is no capacity assessment of the cycle parking at the station, which we understand is heavily utilised.

SUMMARY

2.1.13 Overall, it is considered that the location of the proposed development does not present future residents with realistic alternatives to the use of the private car. The bus stops are over 400m away, there is no direct bus service to the rail station, and there is considered to be a lack of local amenities.

2.1.14 No measures are set out in the TA to improve access to the site other than the provision of cycle parking, which is required by policy. Further, there is no acknowledgement of the Healthy Streets approach set out within the Oxfordshire County Council - Local Transport and Connectivity Plan 2022 – 2050 at Policy 8. This policy is required to make Oxfordshire's vision to make walking, cycling, public and shared transport the natural first choice.

2.2 EQUESTRIAN ACCESS

2.2.1 Meadow Lane, is a recognised and well used route for pedestrians, cyclists, horses, the latter of which is demonstrated in Figure 2-2.

Figure 2-2: Equestrian users on Meadow Lane

2.2.2 The TA fails to acknowledge the important role of Meadow Lane in this regard and therefore mitigate the impacts on equestrian users due to the increased vehicular traffic on the lane. Page 67-68 of the Oxfordshire County Council - Local Transport and Connectivity Plan 2022 – 2050, dated July 2022 states:

As well as traditional road users, Oxfordshire has a high number of horse riders and horse owners who use the roads and PRoW network. These equestrian interests contribute to the local economy through spending on livery and associated goods and services.

In 2011 the government endorsed the Strategy for the Horse Industry in England and Wales. Aim 5 of that strategy is increasing access to off-road riding and carriage driving. The aim's strategic objectives are:

- *Ensuring a joined up and well-maintained network of equestrian ProW.*
- *Increasing provision of other off-road equestrian routes and of areas with equestrian open access.*
- *Continuing safety education for motorists, riders and carriage drivers.*

> • *Ensuring urban and suburban riding and carriage driving are promoted and improved as well as rural riding and carriage driving.*

In the years since then, Oxfordshire Rights of Way Improvement Plans and Local Transport Plans have included some consideration of equestrian issues. The government's strategic objectives are still relevant and still require additional action.

2.2.3 Policy 17 of the Oxfordshire County Council - Local Transport and Connectivity Plan 2022 – 2050, also states:

We will:

> *a. Consider the needs of equestrian users in roads and highways strategies and planning as well as operations.*
>
> *b. Continue to embed Aim 5 of the Strategy for the Horse Industry in England and Wales into relevant guidance and decision-making processes in order to improve safety, network connectivity and network quality for equestrians.*

2.2.4 This policy is needed so that equestrian interests are considered and integrated as part of development planning, transport planning, road safety and road maintenance strategies. This will help to improve safety, minimise risk and improve inclusivity. Further, engagement with local equestrian users will also help to identify where limited resources could be best targeted and where opportunities could be gained.

2.3 HIGHWAY NETWORK

2.3.1 VTP Drawing **4989-2001-T-**001 Rev A – Meadow Lane Junction with Church Way, a copy of which is included within **Appendix A** of this Technical Audit, presents the visibility constraints of the existing priority junction. Church Way is identified as being a 20mph road.. It is noted that traffic surveys were undertaken in January 2022 along Meadow Lane, and the results are presented in Section 3 of the TA that supports the application. These results identify that the 85th percentile speeds along Meadow Lane were recorded as being 14.5mph in an eastbound direction and 16.3mph in a westbound direction. As such, the consultants consider that a design speed of 20mph along Meadow lane is robust. This is agreed. However, no speed data was recorded along Church Way which as the main access road to the village.

2.3.2 In accordance with Table 7.1 of the Department for Transport's (DfT) Manual for Street's (MfS), visibility splays at junctions of this nature should include a setback distance of 2.4m and relate to the appropriate stopping sight distance (SSD) for vehicles approaching Meadow Lane from Church Way, which is identified as being 25.0m for a 20mph design speed. Drawing **4989-2001-T-001** shows that the required visibility splays of 2.4m x 25.0m are not achievable in either direction.

2.3.3 Further, as noted above, no speed surveys have been provided within the TA to demonstrate that the sub-standard geometric design of the Church Way/Meadow Lane junction is acceptable is terms of safety. Church Way is the only motorised vehicle route to the proposed development site and intensification of the junction as a result of the proposed development could lead to collisions with non-motorised users of the Highway in this location such as pedestrians, cyclists and equestrian users.

2.3.4 It is therefore critical that speed surveys are undertaken on Church Way in the location of the junction to demonstrate that the existing geometric design of the Church Way/Meadow Lane junction, including stopping sight distances, is appropriate to given the proposed intensification of use.

2.3.5 To the south, the achievable visibility splay is identified as being 2.4m x 12.0m, which is constrained by an existing property (land coloured pink). To the north, the achievable visibility splay is identified as being 2.4m x 19.0m, which is constrained by the existing on-street disabled parking bay. As such, the required visibility splays, in accordance with MfS, cannot be achieved. Therefore, any increase in traffic flows at this junction should mitigate the impact that they create, which would be to provide suitable visibility at a junction that is already constrained. There are no proposals set out within the TA to make improvements at the Meadow Lane/Church Way junction or even an acknowledgement of its existing sub-standard design.

2.3.6 Whilst this is an existing junction with constraints that make it potentially outside the control of the Applicant to improve the junction, it is our view that this is an unacceptable approach given that the use of the junction will be intensified as a result of the proposed development and therefore safety implications associated with inadequate junction visibility will be exacerbated. This is particularly relevant to inter-visibility with cyclists who use Meadow Lane, and this is discussed in further detail below under Accident Data. Further, given the intensified use of the Meadow Lane/Church Way junction and its sub-standard inter-visibility provision, it is recommended that this junction is also subject to a Stage 1 Road Safety Audit (RSA).

2.3.7 Drawing 4989-2001-T-001 Rev A also shows the limited carriageway width on Church Way and Meadow Lane, particularly where this is further restricted by parked cars. The development proposals include the provision of cobbles on Meadow Lane to delineate the beginning of the current shared surface section of the carriageway. Cobbles provide a difficult surface for people with mobility problems to walk on, as well as creating an uneven surface for equestrians, wheelchair users and pushchairs for children.. Further cobbles provide increases in tyre noise from motor vehicles, creating increased noise impacts for existing residents.

2.4 ACCIDENT DATA

2.4.1 The TA has undertaken a review of data for a period of 5 years, which is considered to be an appropriate length of assessment as a large proportion of data for a period of 3 years may have been affected by the effects of the COVID-19 Pandemic. The TA states that there were three slight injury accidents in the vicinity of the Site, and the closest involved a cyclist and car.

2.4.2 VTP's review of the accident data provided within Appendix B of the TA, records 13 accidents within the study area, of which 7 (over 50%) involved pedal cycles and a car. Further, 3 of the accidents (circa 23%) involved a motorcycle and a car. This indicates that 77% of the accidents recorded in the study area involved two-wheeled vehicles leading to an assumption that there could be safety implications where visibility is reduced and, therefore, smaller vehicles are not seen by other road users.

2.4.3 Page 63 of the Oxfordshire County Council - Local Transport and Connectivity Plan 2022 – 2050 states under Road Safety:

> *"Improving road safety is a fundamental part of our LTCP. There has been a long term downward trend in reported collisions and injuries in the county. It is important that we continue this trend and minimise road danger for all users. This chapter builds on our heathy place shaping proposals and outlines our target to have zero, or as close as possible, road fatalities or life-changing injuries by 2050."*

2.4.4 Further, on page 64 it states:

> *"In order to improve road safety for all we will be adopting a vision zero approach. The aim of vision zero is to have zero road fatalities or life-changing injuries on Oxfordshire's transport system by 2050."*

> *"In order to improve road safety for all we will be adopting a vision zero approach. The aim of vision zero is to have zero road fatalities or life-changing injuries on Oxfordshire's transport system by 2050."*

2.4.5 It is therefore concerning that the development proposals will intensify the use of the Meadow Lane/Church Way junction but are not intending to improve it from a safety perspective by bringing the inter-visibility envelopes up to the recommended levels.

2.5 SITE ACCESS

MEADOW LANE

2.5.1 The new vehicular access on Meadow Lane and the necessary visibility splays would require the removal of a significant amount of vegetation and result in the loss of local wildlife habitat. Further, given that the proposed residential units fronting Meadow Lane do not appear to have access to parking spaces, it is likely that these residents will park on Meadow Lane within the visibility splay envelopes and in close proximity to the proposed Site access junction. This presents a safety risk not only for drivers but, more importantly, for pedestrians, cyclists and equestrian users on Meadow Lane which is part of Oxfordshire County Council's Quiet Route OXR18.

2.5.2 The County's Transport Development Control team has stated within their pre-application comments on the proposed development that Meadow Lane is a busy pedestrian and cycle route. **Figure 2-3** shows the high level of existing pedestrians and cyclists on Meadow Lane, as well as the existing on-street parking arrangement.

Figure 2-3: Pedestrians, cyclists and parking on Meadow Lane

2.5.3 VTP's review of the accident data, as set out above, demonstrates that the number of cyclists in the area and inadequate inter-visibility for motor vehicles are likely to lead to an increase in collisions. Therefore, parking controls on Meadow Lane would be required to prevent vehicles from parking in the vicinity of the Site access and impeding the required visibility splays. However, this would lead to parking overspill further along Meadow Lane or onto Church Way, impacting the ability of existing residents to park.

2.5.4 The County's Transport Development Control team have stated within the Officer's Report dated 2nd February 2023 that double yellow lines should be provided on Meadow Lane *"approximately 90 metres from the junction with Church Way where the dedicated footway finishes, to the bollards to the north of the corner".* They also go on to state that "*Double yellow lines are also required 25m either side of the new vehicular access on Church Way. This allows the visibility splays to be kept clear but will also allow more space for cyclists and pedestrians, a large number of which walk along the narrow footpath to the lock, especially on weekends and sometimes need to use the carriageway".*

2.5.5 The provision of double yellow lines will prevent overspill parking from the Site occurring in the vicinity of the proposed new accesses on Meadow Lane and Church Way. However, this will not only impact on existing residents' ability to park in front of their properties on these roads, it will also increase the demand on the available on-street parking supply for existing residents when future residents compete for the same kerb space. The latter part of this comment by the council clearly indicates there is already a highways safety issue with narrow footways and the need for pedestrians to walk in the carriageway. This can only be exacerbated by the increased number of pedestrians walking along Church Way as part of the proposed development.

2.5.6 The Site access drawing for Meadow Lane, contained within Appendix E of the TA, shows the appropriate 2.4m X 25.0m visibility splay for a 20mph road. However, the western visibility splay is not drawn to the channel line of the carriageway, indicating a lack of highway design knowledge.

2.5.7 Further, it is considered that a critical site access junction, such as that proposed on the constrained Meadow Lane, should be supported by a Stage 1 RSA. None has been provided with the TA.

CHURCH WAY

2.5.8 The Site access drawing for Church Way, contained within Appendix E of the TA, shows a 1.4m X 25.0m visibility splay. The TA acknowledges this is below the appropriate visibility requirements of an absolute minimum of 2.0m distance back from the edge of the carriageway. The TA justifies this by stating:

> *"…this is an existing access and through pre-application discussions the heritage officer has requested that the wall be retained as is."*

2.5.9 The TA goes on to state:

> *"It should be noted that this access arrangement is unchanged against the existing except that any agricultural use which may generate a handful of trips a day (livestock care) is replaced by trips from the one proposed dwelling. It is considered that this vehicle trip generation would be like for like with a trip in the* morning and a trip in the evening as a worst case.

2.5.10 In the first instance, the plans included in the TA present a scheme that proposes two plots to be accessed from this vehicle crossover, Plots 31 and 32.

2.5.11 Feedback from local residents states that the field is not used for agricultural purposes. It is therefore concerning that the access has not been designed to achieve the minimum requirements for visibility. **Figure 2-4** shows the existing Church Way access visibility. **Figure 2-5** shows how Church Way to the north bends and drops away, providing difficulty with visibility.

Figure 2-4: Visibility from Church Way access to the north and south, respectively

Figure 2-5: Visibility from Church way Access to the north

2.5.12 The proposals will result in the Church Way access use being intensified for access to two dwellings and we do not believe that this is in line with the existing agricultural use of the access. Therefore, the access should be designed to achieve appropriate junction visibility with a setback distance from the carriageway of at least 2.0m and a distance measured along the edge of the carriageway of 25.0m. In addition, as the access crosses the footway with high walls on either side, 2.0m X 2.0m pedestrian visibility splays should also be shown at the vehicle access.

2.5.13 It is our view that visibility requirements cannot be achieved without altering the wall, and therefore there is no scope to provide an adequate vehicular access to the proposed development from Church Way. If amendments to the access are undertaken to achieve the required visibility splays, this would also result in the need to undertake a Stage 1 RSA.

2.5.14 It is noted that the Site access drawing for Church Way, contained within Appendix E of the TA, also shows a 2.0m X 2.0m pedestrian visibility splay in front of the pedestrian access gate but shown at the edge of the carriageway, indicating a lack of highway design knowledge.

EMERGENCY VEHICLE ACCESS

2.5.15 The Building Regulations, Approved Document B states for fire emergency pumping appliance access:

> *"For dwellinghouses, access for a pumping appliance should be provided to within 45m of all points inside the dwellinghouse."*

2.5.16 Typically, 15m of the fire hose is taken up within the property itself, indicating the need for a pumping appliance to be able to stop within 30m of a dwelling. Units 29 and 30 shown on the proposed development plans, appear to be beyond the required distance and therefore do not meet this requirement.

2.6 PARKING

2.6.1 The development proposals are for 32 residential units. The parking standards set out in the adopted Oxford Local Plan 2036 at Policy M3, state that a maximum of 1 space per dwelling is to be provided. The development proposals seek to provide 17 on-site car parking spaces within the Site, which technically accords with these standards. However, this results in 15 units, circa 50% of the development, not having access to a parking space. This reduced level of parking has not been supported by a review of Census data.

2.6.2 The reduced level of on-site parking provision is likely to result in overspill parking on the Site road and potentially on the local roads of Meadow Lane and Church Way. Not only does this impact highway capacity, but it also poses a safety risk, particularly with regard to visibility, which is considered to be one the major contributing factors to highway authorities objecting to developments with reduced parking provisions or being car-free. Paragraph 7.24 of the Oxford Local Plan 2036 states:

> *"The Council may refuse planning permission for development where additional parking pressures arising from the development would severely compromise highway safety and/or severely restrict the ability of existing residents to park."*

2.6.3 Given the constrained geometry of Church Way and the bends that reduce forward visibility, it is concerning that The County's Transport Development Control team could support a development that is unable to provide parking for each residential unit within the limits of the development Site. Further, any overspill parking on Meadow Lane and Church Way would impact the parking supply of existing residents who already park their cars within these locations and lead to the loss of the passing places that inherently occur with parking on the carriageway. **Figure 2-6** shows on-street parking on Meadow Lane.

Figure 2-6: Existing on-street parking on Meadow Lane

2.6.4 In addition, the overspill parking of cars on Meadow Lane and the Site road would impact the swept paths of large vehicles such as refuse collection vehicles. The refuse collection vehicle swept path analysis in Appendix E of the TA demonstrates that the refuse vehicle utilises the entire carriageway of the Site road, and therefore the parking of any cars on the Ste road would restrict such vehicles from appropriately accessing and turning within the Site. The County's Transport Development Control team have stated within the Officer's Report dated 2nd February 2023 that they have raised an objection to the proposals on the design of the internal streets. Amongst other detailed design issues needing to be addressed, they point out that tracking is required to demonstrate that a refuse vehicle can safely pass a car.

2.6.5 More concerning is that the emergency vehicle access swept path analysis within the TA demonstrates that any parking on the Site road would impede access for emergency vehicles. Whilst the Applicant may assert that sufficient parking has been provided for the development and that residents would park in the proposed parking spaces, no allowance has been made for visitor parking which would either occur on the Site road or on local roads. The implications of this have already been stated.

2.6.6 The Officer's Report states that double yellow lines should be provided on the Site's internal roads. However, this will result in future residents' parking and visitor parking competing for the same on-street parking kerb space of existing residents which will be further reduced in capacity by the introduction of double yellow lines on Meadow Lane and Church Road.

2.6.7 The proposed development parking provision has been based on the local parking standards set out within the adopted Oxford Local Plan 2036. The standards state in Policy M3 that residential developments will be car-free if the development is located within a 400m walk distance to frequent (15-minute) public transport services and within 800m walk distance to a local supermarket or equivalent facilities. It is considered that the Site does not meet either of these criteria, and therefore parking should be provided in accordance with the standards of 1 space per dwelling.

2.6.8 The TA states that parking on the Site will be unallocated. Whilst not explicitly stated within the TA, it is expected the reasoning behind this is to provide all units within the development the opportunity to use a parking space. However, the proposed Site plan shows parking arranged around what appears to be the larger family units, whereas there is very little parking for the smaller units. Therefore, in practice, it is unlikely that the parking will be unallocated, and circa 50% of the development will be without a parking space. In addition to not having the required local amenities or public transport facilities within close enough proximity to justify the reduced parking provision. As previously stated, this is expected to lead to overspill parking and additional pressures on the existing supply on local roads.

2.6.9 Further, Policy M4 of the Oxford Local Plan 2036 - Provision of electric charging point states:

> *"Where additional parking is to be provided in accordance with Policy M3, planning permission will only be granted for new residential developments if:*
>
> *a) provision is made for electric charging points for each residential unit with an allocated parking space; and*
>
> *b) non-allocated spaces are provided with at least 25% (with a minimum of 2) having electric charging points installed. Planning permission will only be granted for non-residential development that includes parking spaces if a minimum of 25% of the spaces are provided with electric charging points."*

2.6.10 The TA states that passive provision will be provided for all parking spaces within the Site for electric vehicle charging. However, there is no further detail on when electric vehicle charging points will be implemented or any triggers that will generate the need for them to be installed. As a consequence, the proposals do not meet the Oxford Local Plan 2036 Policy M4 standard of providing 25% of unallocated spaces with charging points.

2.6.11 Due to the nature of unallocated parking for the proposals, the provision of electric vehicle charging points would be difficult to manage, whereas the provision of at least one allocated space per dwelling on-plot would allow for individual charging points linked to each dwelling's own power supply, would remove this issue.

2.6.12 Oxfordshire County Council's Transport Development Control team have stated within their pre-application comments on the development that car parking dimensions require all spaces to be 2.5m X 5.0m if unobstructed, 2.7m wide if obstructed on one side, and 2.9m if obstructed on both sides. This is in line with the Building Regulations Approved Document M. However, it appears all parking spaces on the Site are 2.5 X 5.0m. Therefore none of the parking spaces provides accessibility for wheelchair access or are future-proofed to achieve this. This, therefore, also contravenes the Oxford Local Plan 2036 Policy M3 with regard to disabled parking provision.

2.6.13 The Oxford Local Plan 2036 parking standards state that parking for powered two-wheelers should be provided at 1 space per 5 dwellings. This equated to 7 spaces based on the proposed provision of 32 dwellings. No such parking is shown on the proposed scheme plans.

2.6.14 Further, the parking standards require Car Club parking spaces to be provided at up to 0.2 spaces per dwelling. This equates to 7 Car Club spaces. Whilst this is accepted to be a high provision, it is noted that the pre-application response from the County's Transport Development Control team commented that the County would support the provision of a car club space and early engagement with Co-Wheels should be undertaken to gauge their opinion on whether another space would be utilised. No such spaces have been proposed for the Site, although the TA acknowledges there is an existing Car Club space on Meadow Lane operated by Co-Wheels that future residents could use.

2.7 IMPACT ASSESSMENT

2.7.1 Trip rates to predict the future trip generation of the proposed development have been obtained from the TRICS database. However, of the five comparator sites selected, four were based on terraced housing, which is not considered to be comparable to the proposed development, which appears to be a mixture of semi-detached houses and maisonettes.

2.7.2 The two-way trip rates used to determine the vehicle trip generation for the proposed development were 0.378 and 0.452 for the AM and PM peak hours, respectively. We would usually expect to see a two-way vehicular trip rate of at least 0.5 per dwelling for both peak hours, although typically, a robust figure of 0.6 trips per dwelling is used in transport planning to derive two-way vehicle trips in the peak hours. Therefore, it is considered that the vehicular trip generation has been underestimated.

2.7.3 Based on the surveyed existing AM peak hourly flow on Meadow Lane of 5 vehicles two-way, the proposed development trip generation of 12 vehicles two-way results in a 240% increase in traffic. The existing PM peak hourly flow of was surveyed as being 3 vehicles two-way. Compared with the proposed 18 vehicles two-way, this equates to a 500% increase in traffic. This is a significant increase in vehicle traffic on an Oxfordshire County Council Quiet Route.

2.7.4 Based on the proposed development traffic, it could be considered that Meadow Lane may no longer be appropriate as a Quiet Route, particularly as there is limited segregation for pedestrians along this route who will also have to share the carriageway with vehicles and cyclists, and equestrian users.

2.7.5 Whilst the vehicular trip generation predicted for the proposed development would not generally trigger the need to undertake junction capacity analysis, given that Henley Avenue is one of the main routes into Oxford from the south, the traffic flows on this road could cause significant driver delay on Iffley Turn. Therefore, notwithstanding that the proposed vehicular trip generation is acknowledged to be low, the increase in vehicle trips could cause a significant impact in terms of driver delay, and therefore junction capacity assessments at the Iffley Turn/Henley Avenue junctions are recommended.

2.7.6 The TA does not undertake an impact assessment on travel modes other than the car. Whilst a travel mode share has been provided based on Census data, this has not been translated into trips generated. This is particularly relevant given that the reduced parking provision means that the majority of residents will not have the use of a car and, therefore, will have to travel by other means. As a result, capacity analysis of other travel modes should be undertaken, particularly on bus routes.

2.8 CONSTRUCTION VEHICLE ACCESS

2.8.1 No details of construction vehicle access or associated trips have been set out within the TA. Whilst it is accepted that such details would be included within a Construction Logistics Plan and Construction Management Plan, which we consider essential conditions of any potential planning permission, given the constraints of the existing highway network and sensitive receptors nearby, it would be expected that this is required at the planning application stage. This would ensure the planning authority does not agree to a scheme that results in a significant impact on the local area and existing residents during the construction phase of the development proposals and to ensure highway safety.

2.8.2 Based on experience, construction vehicle trips, particularly HGVs, would be significant for a development of this size in terms of impact on what are effectively village roads. In this regard, the impact would be adverse, causing existing residents' significant disruption in terms of traffic, noise, dust, vibration, and inconvenience. This is particularly pertinent when the impacts are applied to Oxfordshire County Council's Quiet Route OXR18. Pedestrians, cyclists and equestrian uses would have to mix with construction traffic as there is no alternative equivalent route for them to use.

2.8.3 Further detail is contained within the Construction Traffic Impact Assessment report prepared by the client's Construction Consultant which appraises the impact of construction associated with the development proposals including from a construction traffic perspective.

2.8.4 The County's Transport Development Control team have stated within the Officer's Report dated 2nd February 2023 that the construction phase of the project would be a significant concern with obvious risks associated with large construction vehicles entering and existing the site with the large number of pedestrians and cyclists using Meadow Lane.

3 SUMMARY, POLICY CONTEXT & CONCLUSION

3.1 SUMMARY

3.1.1 VTP has undertaken a Technical Audit of the Transport Assessment (TA) prepared for the development proposals of 32 residential units on the site referred to as *Land bounded by Meadow Lane and Church Way, Oxford, Oxfordshire, OX4 4ED*. The TA, prepared by Ridge and Partners LLP, is fairly generic and follows a typical format that is more akin to a Transport Statement than a Transport Assessment.

3.1.2 From an accessibility perspective, the TA is light on information. This is most likely due to the fact that the area is not very accessible from a sustainable transport perspective. Commentary within the TA on walking and cycling is mainly based on PRoWs, which are only realistically useable for certain times of the day and year due to short daylight hours and variable surface conditions, and generally with no lighting or passive surveillance.

3.1.3 With regard to public transport, the nearest bus stops are over 600m walk distance from the site, which is 50% further than the generally accepted maximum walk distance of 400m. In addition, Oxford Station is 4.5km away, which is two bus journeys from the site as well as an eight-minute walk to the bus stops themselves. Furthermore no assessment of impacts on other modes of transport has been undertaken.

3.1.4 In relation to local amenities, there is a lack of information in the TA indicating that the Site may not be as accessible as the TA purports it to be.

3.1.5 Notably, the TA fails to acknowledge the presence of Oxfordshire County Council's Quiet Route OXR18 which runs past the site on Church Way and Meadow Lane. This route provides a key pedestrian, cycle and equestrian route used by residents and visitors for commuting and recreation activities. The route is shown in **Figure 2-1**, with the site circled in red.

3.1.6 There is no analysis within the TA on how the proposed development will impact upon the amenity of pedestrian, cycle and equestrian access on the route and as a result, the safety implication of the proposed development on OXR18 have not been assessed or mitigation proposed.

3.1.7 VTP's review of the accident data records 13 accidents within the study area, of which 7 (over 50%) involved pedal cycles and a car. Further, 3 of the accidents (circa 23%) involved a motorcycle and a car. This indicates that 77% of the accidents recorded in the study area involved two-wheeled vehicles leading to an assumption that there could be safety implications where visibility is reduced and, therefore, smaller vehicles are not seen by other road users. There is no mitigation within the TA to address this and the aims of Oxfordshire's Vision Zero approach.

3.1.8 The local parking standards state that a maximum of 1 space per dwelling is to be provided. The proposals are to provide 17 parking spaces within the Site which technically accords with these standards. However, this results in 15 units, circa 50% of the development, not having access to a parking space. This reduced level of parking has not been supported by a review of Census data.

3.1.9 The proposed number of parking spaces is likely to lead to overspill parking on the Site road or the local roads of Meadow Lane and Church Way. Not only does this impact highway capacity, but it also poses a safety risk, particularly with regard to visibility and is one of the major contributing factors to highway authorities objecting to developments with reduced parking provisions.

3.1.10 Access into the Site from Meadow Lane is likely to have safety implications due to overspill parking impacting visibility splays. In addition, no Stage 1 Road Safety Audit (RSA) has been provided for the proposed site access junctions with Meadow Lane or Church Way. The proposed Site access on Church Way cannot achieve the necessary visibility requirements and therefore, also poses a significant safety risk.

3.1.11 The Officer's report requests double yellow lining on Meadow Lane, Church Way and the Site's internal roads. However, whilst this will prevent vehicle parking on-street within the Site and adjacent to the proposed Site accesses, the actual effect will be a reduced on-street parking supply with an increased demand due to the low level of parking associated with the proposed development.

3.1.12 The existing Meadow Lane/Church Way junction has sub-standard visibility. No proposals have been put forward within the TA to address this, despite the junction needing to accommodate the vast majority of traffic associated with the development, including heavy vehicles. A Stage 1 RSA should be provided for this key junction.

3.1.13 The impact assessment is based on trip rates that have been obtained using comparator sites that do not compare well with the development proposals. In addition, the two-way vehicle trip rates are considered to be low, and no junction capacity assessments have been undertaken to demonstrate that the traffic associated with the proposed development would not have an adverse impact on the operation of the local highway network. Further, no impact assessment has been undertaken on other modes of transport.

3.1.14 Based on the surveyed existing AM peak hourly flow on Meadow Lane of 5 vehicles two-way, the proposed development trip generation of 12 vehicles two-way results in a 240% increase in traffic. The existing PM peak hourly flow of was surveyed as being 3 vehicles two-way. Compared with the proposed 18 vehicles two-way, this equates to a 500% increase in traffic. This is a significant increase in vehicle traffic on an Oxfordshire County Council's Quiet Route.

3.1.15 Based on the proposed development traffic, it could be considered that Meadow Lane may no longer be appropriate as a "Quiet Route", particularly as there is limited segregation for pedestrians along this route who will also have to share the carriageway with vehicles and cyclists, and equestrian users.

3.1.16 The TA does not consider construction traffic nor provide any indication of potential routeing. Based on experience, construction vehicle trips, particularly HGVs, would be significant for a development of this scale in terms of impact on what are effectively village roads. Therefore, in this regard, the impact would be adverse, causing existing residents' significant disruption in terms of traffic, noise, dust, vibration, and inconvenience.

3.1.17 The County's Transport Development Control team have stated:

"There is significant concern regarding the construction phase of the project should this application gain planning permission. For all of the reasons discussed above, there are obvious risks with large construction vehicles entering and exiting the site from Meadow Lane with the large number of pedestrians and cyclists that use it."

3.1.18 within the Officer's Report dated 2nd February 2023 that the construction phase of the project would be a significant concern with obvious risks associated with large construction vehicles entering and exiting the site with the large number of pedestrians and cyclists using Meadow Lane.

3.2 POLICY CONTEXT

3.2.1 Attention is drawn to the following transport policies that based on the contents of this Technical Audit, it is considered, the proposed development contravenes:

LOCAL POLICY

OXFORD LOCAL PLAN 2036

Policy M1: Prioritising walking, cycling, and public transport

Planning permission will only be granted for development that minimises the need to travel and is laid out and designed in a way that prioritises access by walking, cycling and public transport.

Walking:

In order to promote walking in the city and improve the pedestrian environment, development proposals must meet the needs arising from the development and take opportunities to achieve improvements.

Proposals shall:

a) ensure that the urban environment is permeable and safe to walk through and adequately lit, with good and direct connections both within and across the wider network;

b) make improvements to the pedestrian environment including the provision of high quality crossings points where needed, seating, signage and landscaping; and

c) support high quality public realm improvement works (refer to Policy DH1) and ensure that footways are sufficiently wide to accommodate the level of use.

Cycling:

In order to promote cycling in the city and ensure an accessible environment for cyclists, the Council will seek to ensure that development:

d) provides for connected, high quality, convenient and safe (segregated where possible) cycle routes within developments and the wider networks that are permeable and can accommodate the anticipated growth in cycling;

e) provides for accessible, conveniently located, secure cycle parking facilities in both private and publicly-accessible locations; and

f) makes provision for high quality on-site facilities that promote cycle usage, including changing rooms, showers, dryers and lockers .

Policy M2: Assessing and managing development

A Transport Assessment must be submitted for development that is likely to generate significant amounts of movement, in accordance with the requirements as defined in Appendix 7 .1 .

Transport Assessments must assess the multi-modal impacts of development proposals and demonstrate the transport measures which would be used to mitigate the development impact to ensure:

a) there is no unacceptable impact on highway safety;

b) there is no severe residual cumulative impact on the road network;

c) pedestrian and cycle movements are prioritised, both within the scheme and with neighbouring areas;

d) access to high quality public transport is facilitated, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

e) the needs of people with disabilities and reduced mobility in relation to all modes of transport are addressed;

f) the development helps to create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

g) the efficient delivery of goods, and access by service and emergency vehicles is allowed for; and

h) charging of plug-in and other ultra-low emission vehicles is enabled in safe, accessible and convenient locations .

A Travel Plan, which has clear objectives, targets and a monitoring and review procedure, must be submitted for development that is likely to generate significant amounts of movement in accordance with the requirements in Appendix 7 .2 . Travel Plans must help to support outcomes (a) to (h) set out above.

A Construction Management Plan must be provided for developmentsof:

- 20 dwellings or more;
- 500m2 or more of non-residential floorspace; or
- any size in a location where construction activities are likely to have a significant impact on the adjacent or surrounding road network.

A Construction Management Plan should set out how the construction phase of the development will be managed and in particular:

- Time of operations
- Noise Operations
- Abatement Noise Techniques
- Monitoring Noise Levels
- Vibration Levels
- Dust Levels
- Wheel washing arrangements
- Rodent Controls
- Community Liaison
- Traffic management incl. deliveries and contractors vehicles
- Waste Materials

Planning permission will only be granted if the City Council is satisfied that adequate and appropriate transport-related measures will be put in place.

Policy M3: Motor vehicle parking

Residential developments

In Controlled Parking Zones (CPZs) or employer-linked housing areas (where occupants do not have an operational need for a car) where development is located within a 400m walk to frequent (15minute) public transport services and within 800m walk to a local supermarket or equivalent facilities (measured from the mid-point of the proposed development) planning permission will only be granted for residential development* that is car-free.

In all other locations, planning permission will only be granted where the relevant maximum standards set out in Appendix 7 .3 are complied with. The need for disabled parking must be considered in all residential developments in accordance with the standards set out in Appendix 7 .3.

Parking for car club vehicles must be provided in all residential developments with the standards set out in Appendix 7 .3

Policy M4: Provision of electric charging points

Where additional parking is to be provided in accordance with Policy M3, planning permission will only be granted for new residential developments if:

a) provision is made for electric charging points for each residential unit with an allocated parking space; and

b) non-allocated spaces are provided with at least 25% (with a minimum of 2) having electric charging points installed.

REGIONAL PLANING POLICY

OXFORDSHIRE COUNTY COUNCIL - LOCAL TRANSPORT AND CONNECTIVITY PLAN 2022 - 2050 JULY 2022

3.2.2 Policy 15 states:

We will:

a. Adopt the vision zero approach, which seeks to eliminate all fatalities and severe injuries on Oxfordshire's roads and streets, to have safer, healthier, and more equitable mobility for all.

b. Work closely with partners and stakeholders to take a whole system approach, working together on infrastructure, behaviour, technology and legislation to achieve this change.

3.2.3 Policy 17 states:

We will:

a. Consider the needs of equestrian users in roads and highways strategies and planning as well as operations.

b. Continue to embed Aim 5 of the Strategy for the Horse Industry in England and Wales into relevant guidance and decision-making processes in order to improve safety, network connectivity and network quality for equestrians.

NATIONAL POLICY

NATIONAL PLANNING POLICY FRAMEWORK (NPPF) – JULY 2021

3.2.4 Section 9 of the NPPF, Promoting sustainable transport states at paragraph 104:

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;

c) opportunities to promote walking, cycling and public transport use are identified and pursued;

d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and

e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

3.2.5 Further, at paragraph 105, it states:

The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

3.2.6 Paragraph 111 states:

Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

3.2.7 Paragraph 112 states:

Within this context, applications for development should:

a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

3.3 CONCLUSION

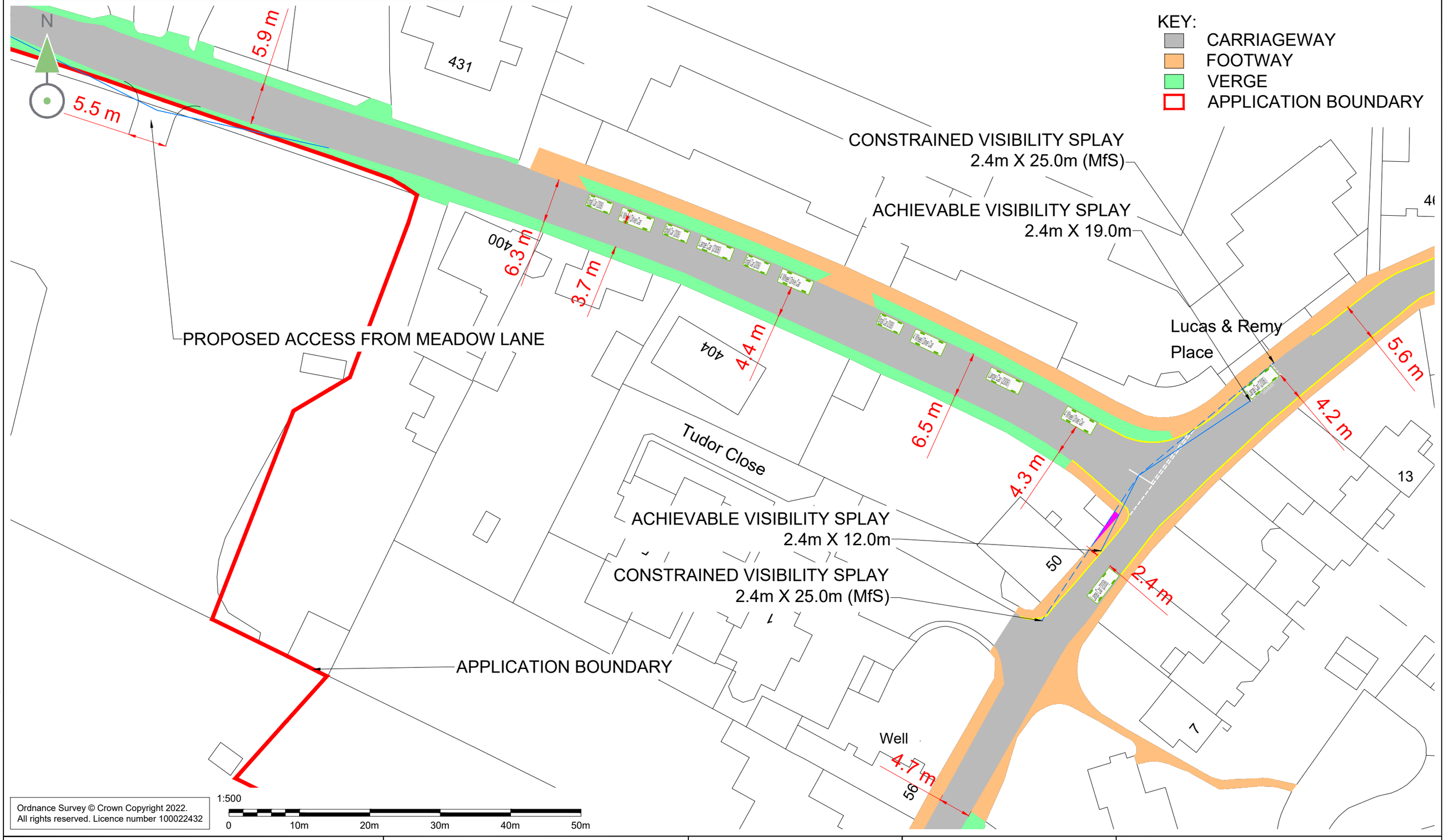
3.3.1 Overall, the proposed development is likely to lead to a number of highway safety issues that the TA has failed to address or properly mitigate. It is on this basis that we would expect Oxfordshire County Council, as the highway authority, to object to planning permission on highway safety grounds particularly with regard to paragraph 111 of the NPPF.

3.3.2 National Planning Policy Framework (July 2021) paragraph 111, which states:

> "*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*

APPENDIX A

VTP DRAWING



Rev	Date	Description	Drn	Chk	App
A	24/01/23	FIRST ISSUE	TC	CWP	MK

Notes:

1. DO NOT SCALE FROM THIS DRAWING.
2. ALL DIMENSIONS ARE IN METRES UNLESS OTHERWISE STATED.
3. THIS DRAWING IS TO BE PRINTED IN COLOUR.
4. THIS DRAWING HAS BEEN ISSUED FOR INFORMATION PURPOSES AND MUST NOT BE USED FOR CONSTRUCTION.

VELOCITY
Transport Planning

Drawing Status: S2 - FOR INFORMATION				Project Title: MEADOW LANE, IFFLEY	
Client: FRIENDS OF IFFLEY VILLAGE				Drawing Title: MEADOW LANE JUNCTION WITH CHURCH WAY	
	Scale @ A3: 1:500	Date: 24/01/23	Designed/Drawn: TC	Checked: CWP	Approved: MK
Architect	Project Ref: 4989-2001	Drawing Number: 4989-2001-T-001			Rev: A