

TO STOKE ON TRENT CITY COUNCIL

RE: **57901/FUL** | Erection of two hundred and forty-five dwellings with associated landscaping and access (**amended**) | Land off Meadow Lane/Chessington Crescent, Trentham, Stoke-on-Trent

PLANNING APPLICATION NUMBER : 57901/FUL

**“Keep Our Meadow Green”
RESIDENTS COMMITTEE OBJECTIONS**

Residents Committee Details

Role	Name	Email Address	Phone Number
Chair	Alastair Sutton		
Secretary	Rachel Myatt		
Treasurer	Phil & Karen O'Connell		
	Brian Edwards		
	Kevin Harborow		
	Adrian & Annette Lappin		
	Keith Gracie		
	Rachel Mayer		

Signature Chairman (for council use only):

Signature Secretary (for council use only):.....

Date.....

SUMMARY

On behalf of the **Keep Our Meadow Green** local residents committee of Meadow Lane Trentham, we hereby unanimously OBJECT to the amended proposals put forward by the applicant of the Meadow Lane planning application 57901/FUL.

We recognise that the applicant has put many improvements into the amended application, however there are serious issues highlighted in our previous objection that are not addressed by the applicant and the new content of the documents put forward by the applicant;

- Do not address major issues with the application and;
- Provide indisputable evidence that without any doubt, the applicant's Transport Assessment is dangerously flawed and written to mislead and;
- Contain multiple misrepresentations throughout their documents demonstrating that the applicant's documents cannot be used as a trusted source of evidence upon which the Planning Committee can make a safe and balanced decision in favour of the applicant and;
- Of the facts, which can be validated, the applicant's own evidence categorically proves that the site is unsustainable.

OBJECTIONS to the amended application

1. Flooding



The applicant has not provided a solution to the HIGH flood risk from the Newstead Brook or HIGH groundwater flood risk. Nor does the applicant provide data on the additional risk and flow into the Newstead Brook from the Stanley Matthews way ground water run-off in a flood event such as that evidenced in the photograph of the field in flood after a moderate period of rain.

The applicant has not dealt with the issues presented when the Newstead Brook flow overwhelms the Trent and Mersey Canal culvert. When this happens the field floods to the level of the canal wall and substantial areas of the field flood as a consequence.

Photo below of severe flooding throughout the field stranding cows on high ground.



There is no detail of how the “indicative swales/SUDS” will have sufficient capacity or how they will deal with the HIGH risk of ground water flooding on the almost impermeable ground.



7.1 What is the risk of flooding at the centre of the study site?	High
7.2 Are there any Flood Defences within 250m of the study site?	No
7.3 Are there any areas benefiting from Flood Defences within 250m of the study site?	No
7.4 Are there any areas used for Flood Storage within 250m of the study site?	No
7.5 What is the maximum BGS Groundwater Flooding susceptibility within 50m of the study site?	Potential at surface
7.6 What is the BGS confidence rating for the Groundwater Flooding susceptibility areas?	High

2. Conservation Area

The applicant's amended plans do nothing to further protect the conservation area, and will in fact irreversibly destroy the very character the conservation area was intended to protect.



Furthermore, of particular significance is the mature oak tree at the south of the site. This tree is part of the heritage of the area and has been enjoyed by residents of Stoke on Trent for generations. The tree should be permanently protected. The applicant plans to kill this icon, which has stood in that field for generations. It should not be killed to further the applicant's profits, rather the applicant should plan their site around it.

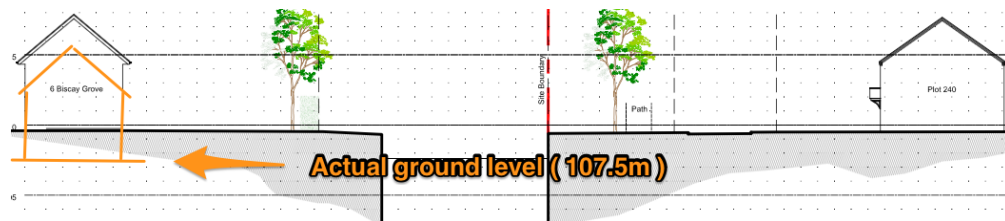
3. Air Quality

The applicant bases the amended Air Quality assessment on the amended Traffic Assessment data, which itself misrepresents current traffic levels, thereby undermining the Air Quality report submitted. The Air Quality report **cannot be safely relied upon** to make a planning application decision.

4. Site Sections

The applicant misrepresents data from their own Site Survey and provides misleading information in their Site Sections document.

In the example we highlight, the applicant attempts to show that the ground on each side of the canal is the same height and consequently the height of the houses on each side of the canal will be similar.

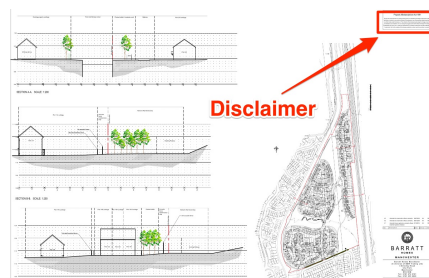


Using the applicant's own survey data as evidence, it shows that the applicant materially misrepresents the respective ground and house heights.

The applicant also signals their intent to not be held to account should they be granted planning permission. In their Site Section document the applicant relies on a disclaimer stating that;

*"The layout, form, content and dimensions of the finished construction **may differ***

materially from those shown." And they also state that the document cannot be considered "*part of any contract*".



Given that the applicant misrepresents their own data on this drawing and they state that the document can not be relied upon, it cannot be considered **safe for this document to be used to inform a planning application decision.**

5. Local Facilities

The applicant states that local facilities are within walking distance, however the applicant's own evidence proves that they are absolutely NOT.

Referring to planning guidelines (Providing Journeys on Foot 2000), there are clearly NO local facilities within a desirable or acceptable walking

distance. The “Manual for Streets” guidance and SoT Council guidance state that local facilities should be within 800m of the centre of the site. There are categorically **NO facilities within this range**.

Furthermore, the applicant's amended documents show that they have dismissed the NPFF presumption in favour of sustainable development and applicant's own evidence demonstrates clearly that the proposed development is not sustainable. The applicant has not demonstrated that they have considered the first and best option in this scenario, which is to provide facilities on the site itself, particularly as the adjacent Meadow Lane estate does not have any community facilities such as a shop, play area (removed from the applicant's original plan) or GP (no capacity for new residents with existing GPs).

The presumption in favour of sustainable development is based on ensuring 'the need to travel will be minimised...' (NPFF, para.35) and that a developer should 'allocate land for essential infrastructure' (NUL and SOT Core Spatial Strategy). Further, SOT Local Transport Plan Strategic Aim 3 states that developers should 'ensure new development makes adequate provision for all necessary community facilities' and (ensure that) 'the quality and accessibility are enhanced'.

6. Public Transport & Journeys

There is only one bus stop accessible from the centre of the site and the applicant calculates that it is at a distance of at least 970m. Three buses an hour pass the bus stop.

The applicant misrepresents the National Travel Survey, to say that 85% of residents of the new development would walk to the bus stop. However the National Travel Survey actually states that only 15% of residents would walk to a bus stop that far away. It is worth noting this virtually rules out any possibility of public transport for residents on the north side of the site, and that the bus stop is about 1.5km from the north most house. The applicant also fails to provide any evidence that they have attempted to secure a bus service within a sustainable distance of the new development.

This data provided by the applicant, although not intended to, confirms that 85% of residents who would have chosen to use the bus, will not walk 970m to the bus stop.

The applicant is obliged to take up every option to make the site sustainable. This clearly includes constructing a footbridge over the canal that would bring the development into line with guidelines for walking distances to public transport (400m not 970m) and local facilities. Indeed a foot bridge would also encourage residents of the adjoining estates to increase journeys on foot and bicycle. There are obvious and viable landing places for the bridge on council owned land on the far side of the canal, but without foundation or evidence, the **applicant has dismissed the only option they have to make the distance of ANY journey on foot from the centre of the site fall within a sustainable range**.

Additionally the concentration of more traffic, including 100% of construction traffic through the single Meadow Lane access and the narrowing of the pavement at the access point by 30% will in fact **decrease** the propensity of residents of the existing estate to use sustainable methods of transport.

7. Single Access Route

The applicant has not addressed the issue that the site will have only one access route to and from the site.

a. Construction Traffic

The applicant has not demonstrated that it is viable and safe for construction traffic to access the site via the residential roads through the Meadow Lane estate, particularly towards the far end of the estate where the roads narrow and the bends are tight.

Due to insufficient off-street parking to allow for two vehicles per house, a considerable number of vehicles are parked on the streets of the estate, usually on both sides of the road, partially parked on the pavement. Construction traffic will be unable to safely pass through the estate to the site in either direction.

The applicant has not demonstrated that construction vehicles will not be at risk of becoming stuck in the estate, blocking the estates roads and thereby preventing access by emergency vehicles.

The applicant has not demonstrated that construction traffic will be able to queue safely anywhere on or near the estate. Citing the example of the current development on Stanley Matthews way (see photograph below), construction vehicles queue for access to the site, reducing the wide Stanley Matthews Way to one lane. There is nowhere for construction traffic to safely queue on the estate without blocking access to residential properties or causing a road traffic safety risk by blocking the estates narrow roads near the proposed construction site.



Furthermore, construction vehicles entering Meadow Lane will be unaware of and unable to see the status of other construction vehicles progressing through the estate or queuing to enter the site, thereby creating a significant road traffic safety issue as throughout most of the estate they will be unable to pass each other due to narrow lanes and/or parked vehicles.

b. Safe Access

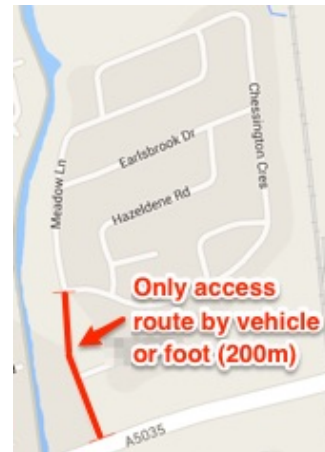


We welcome the inclusion of a second access route onto the proposed development site by the applicant in the amended proposal (not present in the original proposal). The applicant acknowledges that a second “Emergency Access” route to their residential site of 245 house is needed for safety reasons, to be used in the event that access to the site via the **first 5 meters** of main entrance becomes unusable.

Although the applicant believes it necessary to include an emergency access route to their development site for just 245 houses they have not provisioned anywhere in their application, an emergency access route to the Meadow Lane Estate as a whole, which will have 371 + 245 (616) houses should the development go ahead.

We are unable to find any precedent, nor does the applicant cite any precedent where a planning application has been approved or appeal upheld where a single, narrow road is the only access to a housing estate of 600+ houses by vehicle or foot and where there is no possibility of evacuating the estate in an emergency by foot, or allowing access to the site by emergency services by foot or vehicle other than through the main access point.

For example should there be an incident at the PFS opposite the Meadow Lane approach or other issue such as a gas leak within the **first 200 metres** of Meadow Lane (to Chessington Crescent); with 100% of the Meadow Lane estate perimeter totally impassable other than at the Meadow Lane/Longton Road junction, there is absolutely no possibility of access to, or from the estate via vehicle or foot.



Inconsistent with, and contrary to the inclusion of the Emergency Access route for the proposed development, the applicant has NOT demonstrated how the Meadow Lane estate would be served in the case of the need for Emergency Access, on foot or by vehicle nor have they demonstrated that it is safe for residents of all 616 houses to have only a single access to the estate. Approval of the planning application without a second Emergency vehicle access route would exacerbate the current situation into a **SEVERE and unacceptable safety risk**.

8. Transport Assessment

a. Traffic

The applicant has presented traffic flow data indicating that on the day of their survey that there was 25% less peak time traffic on Longton Road than recorded in 2012. Their claim is less than, and contrary to ATC data collected in 2012, 2011, 2010, 2009 and 2008.

The applicant has not followed traffic assessment best practice to validate this anomaly or provided additional traffic sensitivity test data or any other explanation for this extraordinary reduction in traffic on Longton Road.

Photo below of typical peak hour traffic approaching Meadow Lane.



Data from the applicant cannot be relied upon given that the evidence from ATC records and actual traffic count shows that the applicant is highly likely to be presenting unrepresentative figures for traffic flow and it would be unsafe to base ANY traffic modelling on these figures.

Peak	Direction	Apr 2008	June 2009	June 2010	June 2011	Jan 2012	July 2012	Mar 2015
PM	W/B	873	873	1042	932	915	1079	804

Furthermore it would be dangerous to make Road Traffic Safety decisions based on the unrepresentative data presented by the applicant from their traffic survey. Therefore further calculations, modelling and projections based on the applicant's data will compound the error, should be disregarded and **should not be used to inform a planning application decision.**

b. Flared Approach to Meadow Lane

We welcome the applicant's acknowledgment that capacity at the Meadow Lane/Longton Road junction is insufficient to support the proposed development.

To mitigate what will be SEVERE road Traffic issues at the Meadow Lane approach caused by the proposed development, the applicant proposes an improvement via a flared approach to Meadow Lane but no change to the controlling traffic flow on Longton Road.

PICADY demonstrates that the improvements proposed by the applicant will at best provide an insignificant impact on capacity at the junction.

The addition of increased traffic from the proposed development turning out of Meadow Lane into the uncontrolled Longton Road Traffic and additional blocking traffic right turning into Meadow Lane will make the junction considerably worse than it is today causing SEVERE Road Traffic Safety issues at the junction.

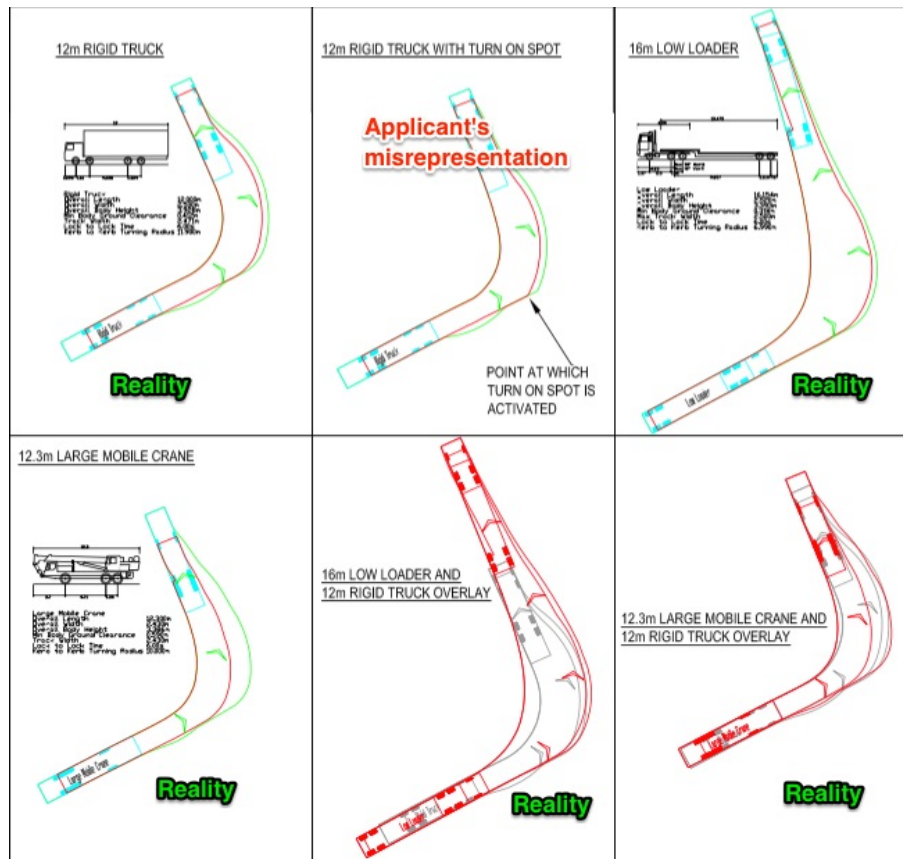
A model using the correct geometry for the junction will show that the applicant's proposed 'improvements' have a negligible impact on the capacity of the junction and therefore **the applicant's proposal for this 'improvement' should be dismissed.**

c. Construction Traffic Access

The applicant has supplied a 'worst case' scenario diagram of a 12m truck turning into Meadow Lane with the new layout.

The diagrams supplied by the applicant **grossly misrepresent reality** and normal construction traffic will not be able to safely turn into Meadow lane without needing to use the majority of the bell mouth of the approach, and this path could be blocked by vehicles turning right out of Meadow Lane and/or parked vehicles at the top of Meadow Lane as is normal at peak times and throughout the day due to the business premises and parking of school traffic who continue the journey on foot to Ash Green School.

Should there be traffic waiting to turn right out of Meadow Lane, then construction vehicles, including the 12m rigid truck cited by the applicant, will not be able to turn in and will hold up traffic on Longton Road.



Contrary to the applicant's claims, the proposed 'improvements' to the junction will create a substantial Road Traffic Safety risk on Longton Road, Meadow Lane and to pedestrians given the likelihood of turning construction vehicles mounting the pavement to enter Meadow Lane.

Furthermore, the applicant has absolutely not provided ANY evidence that such construction vehicles can safely negotiate the narrower lanes close to the proposed construction site.

d. Junction Capacity

Queue

The applicant makes unsubstantiated claims that during peak hours at the Meadow Lane junction, vehicles queue to a depth of three vehicles. The applicant has not carried out a survey or provided ANY evidence to support their claim. In fact, to the contrary, vehicle queues at the junction can enter double figures.

Photo below showing typical peak queues at the Meadow Lane Longton Road junction.



The applicant's claims have no basis in reality and are unsafe. The applicant's queuing claim affects the safety and reliability of predictions of the junction's performance and **should not be used to inform a planning application decision.**

Model

The base model of the junction put forward by the applicant uses incorrect geometry for the Meadow Lane/Longton Road junction. The geometry used is biased to make the junction appear as though it has more base capacity than is actually the case.

Correct modelling of this junction is absolutely crucial to ensure Road Traffic Safety, and the only way to achieve this is to base the model on a topographical survey. However the applicant appears either not to have carried out a topographical survey or has chosen not to base the model on it. Using the incorrect geometry for the base model **renders all subsequent modelling work from the base model, dangerous and unsafe.** Safe planning application decisions regarding Road Traffic Safety can only be made using a base model with the correct geometry.

Major Arm Geometry			Major Arm Geometry		
Arm	Width of carriageway (m)	Has kerbed reserve	Name	Width of carriageway (m)	Has kerbe central rese
A	7.50		Longton Road (A5035) E	8.50	
C	7.50		Longton Road (A5035) W	8.50	

Geometries for Arm C are measured opposite Arm B. G

BASE MODEL (points to 7.50 in Arm A)

FUTURE MODEL (points to 8.50 in Longton Road E)

Actual carriageway width = 7.0m

Compounding the base model problem, we were astonished to find that the applicant has also falsely biased the geometry of their future model by increasing the width of the Longton Road carriageway to 8.5m. The impact of this change is SIGNIFICANT as the fictitious increase in width, then allows one of the Longton Road carriageways to be falsely modelled as a dual carriageway, thereby substantially increasing the capacity of the Meadow Lane/Longton Road junction.

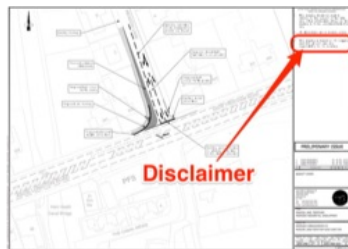
To be absolutely clear, the future model and base model geometry of Longton Road should be exactly the same because the proposed improvements have no impact on Longton Road. The fictitious increase in the width of Longton Road in the future model causes a gross misrepresentation of actual capacity of the junction in the future scenario which would SEVERLEY impact Road Traffic Safety and

therefore **cannot be used to inform the planning application decision.**

Responsibility

Notwithstanding all of the above issues surrounding the applicant's Transport Assessment, incorrect geometry and unsafe proposed junction 'improvement', the applicant claims to take no responsibility for their proposed improvement due the fact that they have based the geometry on Ordnance Survey maps and not on a topographical survey. It is widely recognised that it is unsafe to use OS maps where granularity is required around the 1m level as they are not accurate at that level of granularity, whereas absolute accuracy is required at the junction to ensure Road Traffic Safety.

The applicant claims that they “**do not take any responsibility for its accuracy**”



Therefore none of the applicant's documents or calculations relating to the proposed 'improvement' can be used to safely determine a planning application decision.

CONCLUSION

The Keep Our Meadow Green local residents committee were looking forward to contributing to a fair and reasonable debate on the merits of the planning application based on the amended documents put forward by the applicant.

It is regrettable that the applicant has for a second time, seen fit to submit documents critical to the planning application decision, that contain material misrepresentation, manipulated data biased in favour of the applicant and the applicant claims no responsibility for the accuracy of their submission.

As highlighted above, the omission, manipulation and misrepresentation of guidelines, facts and data is on such a scale and of such significance that the applicant's amended documents absolutely CAN NOT form part of the planning application. Any decision in favour of the applicant based on these documents would create a dangerous and unsafe environment for residents, would create SEVERE Road Traffic Safety issues and mislead prospective purchasers of houses on the development site.

Furthermore we note that a number of SoT City Council's Consultee Comments state that in good faith they are based on data and information provided by the applicant. The evidence highlighted above and the evidence in the previous application documents, 'on the balance of probabilities' prove the propensity of the applicant to submit substantially biased and misleading information. Given the propensity demonstrated by the applicant in the original and amended application, we urge the planning committee to consider that other documents and data provided by the applicant that have been used in good faith by SoT City Council Consultees, may 'on the balance of probabilities' also contain a similar level of deception and it would therefore be unsafe to make a planning decision based on such information.

Also, the applicant has not yet submitted a Transport Assessment based on the correct geometry and credible traffic data, therefore we strongly OBJECT to planning application 57901/FUL on the points above and specifically as the applicant's Transport Assessment is discredited.