

**Bovis Representation LAU-H1 - Matter 10g.**

**Q Is there robust evidence to demonstrate that allocations and infrastructure, particularly education infrastructure and transport infrastructure related to LAU-H3 and LAU-H1, would be delivered at a sufficient rate and suitable timescale to meet the minimum numerical development requirements for the town, including with reference to the five year housing land supply required by national policy.**

Bovis has submitted a planning application that demonstrates that at least part of the LAU-H1 allocation can be forthcoming immediately. This provides for up to 190 dwellings, the majority of the allocation figure, and is not reliant on any third parties for infrastructure provision to provide access to the site for vehicles nor for sustainable means of travel. The illustrative masterplan shows that connections could be provided to the adjacent development to the west, to the remaining part of the allocation to the east and to the south. The conclusions of the Transport Assessment submitted with the planning application are provided at Appendix 1.

In terms of the transport infrastructure noted in Policy LAU-H1 d) Bovis does not believe that there is robust evidence relating to the function, need and design of the Southern Loop Road (SLR), for the reasons given below. Therefore, it is not appropriate for this to be explicit in the policy LAU-H1.

However, if the Inspector is minded to accept the need for the SLR, the first section as required by the policy can be delivered within the allocation but outside the Bovis land. A safeguarded corridor is provided for along the southern edge of the masterplan submitted as part of the current planning application within the Bovis land. This would ensure the maximum developable residential land would be retained. Bovis have previously engaged with Cornwall Council on this matter but a final response was outstanding at the time of preparing this representation. The officer's response to the initial Bovis representation suggests that the Council's recent work has identified that there is flexibility in the alignment and specification of the road.

It has recently come to light that West Country Land (WCL) has undertaken pre-application discussions with the Council regarding the land adjoining the eastern boundary of the Bovis site, forming the remainder of the allocation, as well as an area of land between Tavistock Road and the road to Stourscombe. It is understood from WCL's discussions with the Council that the SLR should be downgraded in specification terms as the Council's evidence on predicted traffic does not support the current level of engineering.

Bovis and WCL have reached agreement on a coordinated approach to the provision of road from Tavistock Road, via WCL and Bovis' interests, connecting with the onwards route of the SLR. This is not yet reflected in the Bovis planning application but it is clear from the submitted outline masterplan that this could be achieved.

The sustainable link to Stourscombe noted in Policy LAU-H1 e) can be delivered by the allocation.

**Lack of Evidence for Southern Loop Road**

Bovis does not believe that there is robust evidence relating to the function, need and design of the SLR. These three criteria are inter-related but considered separately below.

## Function

There has been, and continues to be, uncertainty over the function of the SLR. Stages of the Launceston Transport Strategy Development (LTSD) have identified varying functions for the SLR as follows:

- an access road to the south (a Stage 3 key issue);
- a route to allow the existing Link Road to be a sustainable transport corridor with the SLR also having a sustainable corridor function (Stage 3 modelling) LTSD (Appendix B);
- a 40mph road with verges (LTSD Appendix E alignment options) without facilities for walking and cycling;
- dual purpose: to support future growth and predicted traffic flows whilst ensuring it provides a sustainable connection for the new communities through enabling and promoting trips by foot, bicycle and public transport to local services including employment and education (LTSD Stage 5)

Cornwall Council note that the function continues to be defined (LTSD May 2017, Stage 5).

Furthermore, it is understood that the function of the road has been the subject of recent discussion between WCL and the Council.

In the absence of clarity on the function of the SLR, the need and design cannot be confirmed. Therefore the explicit reference to a scheme in the Policy is not appropriate.

## Need

LTSD Appendix B Launceston Town Model notes that an appraisal was undertaken to develop transport strategies that will mitigate the impact of growth in the town centre (para 2.1.1). The SLR is included in the suite of measures to allow the existing Link Road to be prioritised as a sustainable travel corridor. The traffic flow diagrams provided at Appendix D of LTSD Appendix B, show that:

- the overall effect of the suite of measures has very little benefit on traffic flows, questioning the justification for the SLR as part of that suite; and
- there is no information on the predicted traffic flows on the existing Link Road. Therefore the beneficial effect of the SLR in achieving the prioritisation of the Link Road as a sustainable corridor cannot be identified. In the event that this is no longer a priority, there would need to be evidence to demonstrate the traffic effects of an alternative priority. This is not provided.

Therefore the traffic benefits of the SLR cannot be deduced from the evidence.

Furthermore, it is understood from discussions with WCL's consultants that more recent traffic modelling has been undertaken by the Council, which is not in evidence. This predicts very low traffic flows on the SLR and little effect on the flows in the town centre, further questioning the need for the SLR.

## Specification and Alignment

Road alignment options have been prepared on behalf of Cornwall Council, which include the provision and location of a roundabout on the A388 Tavistock Road and one of the options forms the basis of the indicative alignment shown on figure Lau1 Launceston Strategy Map and Lau2 Launceston Transport Strategy Map. Yet, there is no justification for the width of

the road, the alignment, the form of junction on the A388 or the location of the junction.

There is no predicted traffic data provided for the SLR and therefore no evidence on which the link specification or junction forms can be based.

The design of the SLR continues to be evolved by Cornwall Council, as noted in LTSD Stage 5 and the Council's response to Bovis reps on the LAU-H1. Therefore there is no evidence that the indicative SLR alignment is now appropriate. Yet the alignment of the SLR remains unchanged on figures Lau1 and Lau2, for which there is no evidence in any event.

Specific reference to this scheme in Policy LAU-H1 is inappropriate given the lack of evidence on the specification and indicative alignment of the SLR.

### **Summary of Response to Question**

The Bovis application demonstrates that the major part of the allocation can be delivered and is not dependent on infrastructure for the site to come forward immediately.

Bovis believes that there is no robust evidence to support the need for the Southern Loop Road, the function of the road nor the specification and location identified.

Notwithstanding this position, if the Inspector is minded to agree with the Council regarding the requirement of the SLR, the road could be delivered, albeit on an alternative alignment but equivalent specification. Furthermore, a coordinated approach between Bovis and WCL is agreed and a road alignment to meet what we consider to be a more realistic function could be provided through the sites which make up the allocation.

## **Appendix 1 - Conclusions of Transport Assessment for Bovis' Planning Application**

- The proposed development is consistent with NPPF guidance on sustainable location and accessibility, and on lack of severe cumulative transport impact.
- The proposal is consistent with local policy.
- The proposals would connect to the existing pedestrian network through the adjacent Withnoe Farm site. The development would be accessible to local facilities on foot, cycle and by bus and to employment, leisure and shopping facilities further afield by bus.
- The primary access road would be designed in accordance with DMRB and Manual for Streets.
- Satisfactory vehicle access can be achieved.
- The internal road layout would be designed to the principles of Manual for Streets, including a 20mph design speed.
- The traffic generation of the proposal would not have a material impact on local junctions with capacity testing showing that all junctions tested would work within capacity. The increase in traffic on the trunk road slip roads is not material. Any increase in queuing has been taken into consideration in the Launceston Transport Strategy assessment and mitigation in any event.
- There is no reason to suggest that the proposal would give rise to road safety issues.
- The proposal does not prejudice the delivery of the Launceston Town Plan or transport strategy and would facilitate its delivery by restricting development to the northern part of the site.