

2408-037/NH/00
26 September 2024

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Dear Sophie

**PA24/05179 - Construction of new lifting bridge from Lighterage Quay to Boscawen Park
Objection on highway safety grounds**

Transport Planning Associates have been engaged by Newham BID to undertake a review of this planning application, with a focus on highways matters, in particular cyclist and pedestrian safety. According to the Design and Access Statement provided by WSP, the proposals "would help improve pedestrian and cyclist connectivity around Truro" and will "ensure a much needed connection between the eastern and western sides of the Truro River while also improving the area around Lighterage Quay through public realm improvements".

Limited of highway impact assessment

Clearly the proposed development will generate a number of new cyclist and pedestrian trips along roads in the vicinity of the site, as a result of the significantly reduced distances / travel times from one side of the river to the other. There is an assessment of vehicle trips associated with the proposed on site parking within the Transport Statement that supports the planning application, however there is no assessment of cycle or pedestrian traffic. Neither the Design and Access Statement nor the Transport Statement make any effort to quantify the anticipated volumes of new / diverted pedestrian and cyclist trips that will be generated by the development proposals or the anticipated routing of those trips on the local highway network. There is also no assessment in either document that seeks to understand the safety of the anticipated new / diverted pedestrian and cyclist trips that will be generated.

Highway safety concerns

A brief review of the highway network on the west side of the river highlights a significant lack of suitable pedestrian or cycle infrastructure. Key issues include the lack of pedestrian footway on either side of Newham Road to the north of the application site, the lack of a pedestrian crossing on Newham Road or a footway on the west side of Newham Road opposite the site frontage.

Cycle access to the site is by road only, either via Newham Road or Lighterage Hill. There are no cyclist facilities on either road and the junction between the two roads, that is immediately adjacent to the proposed site access, is frequented by heavy goods vehicles. Heavy goods vehicles navigating the junction are required to utilise both sides of Newham Road and Lighterage Hill in order to turn from one road to the other, thus presenting significant risk to any cyclists waiting to enter Newham Road from Lighterage Hill or approaching on Newham Road from the north.

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The proposals include a new section of pedestrian footway along the western frontage of the application site and some of the application documents suggest "New Road and Junction alignment and New Crossing to Cormac Design" and "Detail to be delivered under separate application.", however no further detail is provided.

Local planning policy guidance

Policy 27 of The Cornwall Local Plan (2010 – 2030) is titled 'Transport & accessibility' and sets out that:

"All developments should: Provide safe and suitable access to the site for all people and not cause a significantly adverse impact on the local or strategic road network that cannot be managed or mitigated."

The development proposals are considered to be in conflict with policy 27 of the Cornwall Local Plan, as the proposals do not provide safe and suitable access for pedestrians and cyclists.

National Planning Policy Framework (NPPF)

The NPPF sets out at paragraph 115 that:

"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."

The impacts on highway safety as a result of the development proposals have not been fully assessed by the applicant, with no analysis provided of anticipated cycle or pedestrian traffic and no analysis of the routes that those vulnerable road users will take in order to gain access to the development proposals. A brief review by TPA suggests that, in the absence of any mitigation measures being proposed within the application, there will be an unacceptable impact on highway safety as a result of the development and as such the application should be refused in accordance with paragraph 115 of the NPPF.

Objection summary

The proposed development will result in an increase in pedestrian and cyclist trips to the site and the supporting information provided makes no attempt to assess the volumes of new pedestrian or cycle traffic, or the safety of those trips.

Pedestrian and cycle infrastructure improvements are considered to be necessary in order to make the development acceptable and as such, those improvements should be put forward for consideration as part of the planning application so that their suitability as mitigation for the impact of the development can be considered by the planning authority and consultees.

Insufficient information has been provided by the applicant with respect to the impact of the development proposals on highway safety, in particular that of vulnerable road users. The application should therefore be refused on highway safety grounds, in accordance with policy 27 of the Cornwall Local Plan and paragraph 115 of the NPPF.

Highway improvements outside of the planning application process

I have been made aware that there are proposals for some highway improvements adjacent to the site, outside of the planning application process and Newham BID have requested that I review those proposals. A copy of my report providing that review is appended to this letter and that further highlights the highway safety issues associated with the planning application, as well as deficiencies in the proposed highway improvements.

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Yours sincerely,



Nathan Hanks
Director

Enc. TPA Technical Note ref. 2408-037/TN01

Newham BID

Lighterage Hill,
Truro

Project Reference: 2408-037/TN/01

Technical Note

1 Introduction

- 1.1 Transport Planning Associates (TPA) have been instructed by Newham BID to review Cornwall Council's proposals for changes to pedestrian and cycle infrastructure on Lighterage Hill and Newham Road. The works are understood to be related to the proposed new bridge at Lighterage Quay.
- 1.2 TPA has been providing highways advice to developers, local authorities and private individuals for more than 25 years, including the provision of road safety audits and the design of cycle and pedestrian infrastructure.
- 1.3 Consultation documents advise that:

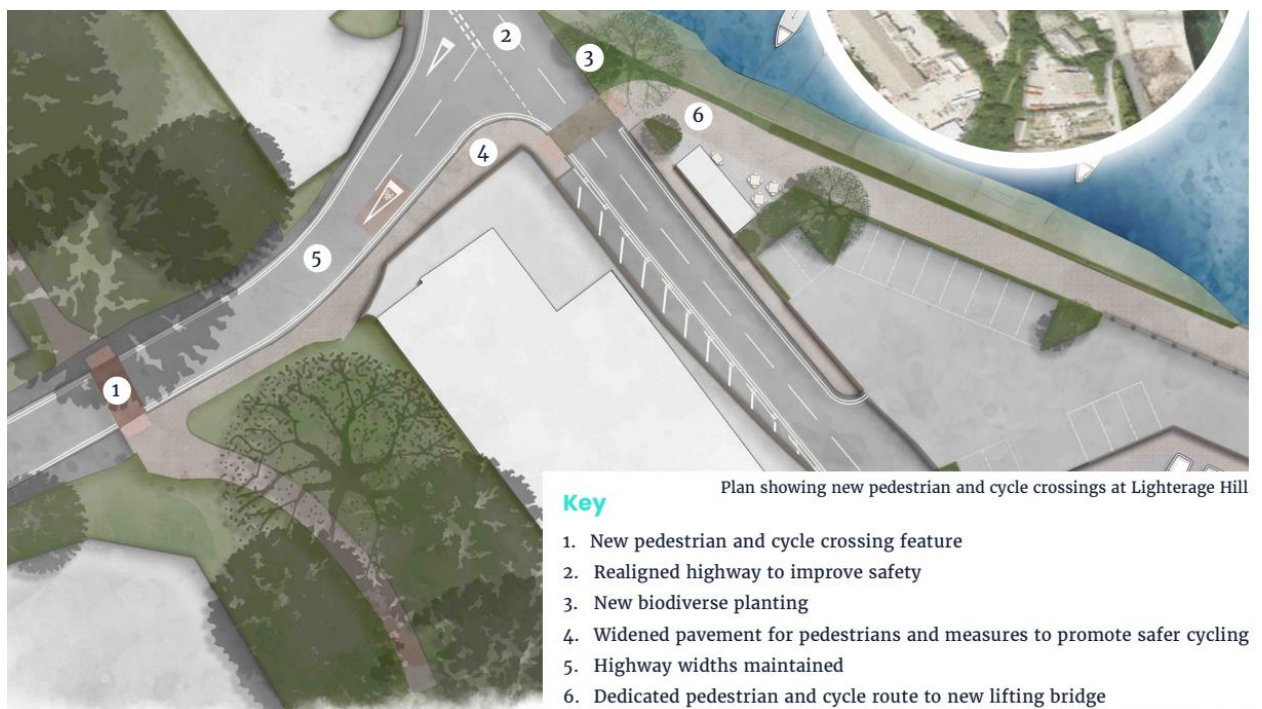
"Lighterage Hill provides connectivity to the Truro River Loop transitioning between the existing Newham Trail, part of the National Cycle Network 3, and the proposed lifting bridge at Lighterage Quay. The project will look at enhancements to the footpaths, wayfinding and improvements to visibility around the intersection between the trail and the road to promote safer links to the riverside."

- 1.4 The bridge will create new demand for cycle and pedestrian trips to and from Newham Trail, along Newham Road and through the Lighterage Hill junction, thus it is of key importance to ensure that these routes provide suitable levels of safety for those new trips by vulnerable road users.
- 1.5 Lighterage Hill and Newham Road provide access to Newham Industrial estate and are thus subject to frequent heavy goods vehicle movements. There are inherent risks with mixing cycle, pedestrian and heavy goods vehicle traffic at narrow / sub-standard junctions and Newham BID is thus understandably concerned that the proposals by Cornwall Council are carefully scrutinised and that their design is suitable and safe.

2 Scheme review

Overview and initial analysis

- 2.1 The proposals include an improved crossing across Lighterage Hill where Newham Trail crosses it, footway widening on the south side of Lighterage Hill and at the junction with Newham Road and a new uncontrolled pedestrian crossing (dropped kerbs and tactile paving) across Newham Road. The scheme is shown in outline in the below extract from the recent public consultation and in detail at **Appendix A**.



Extract from public consultation document

- 2.2 Design drawings for the scheme have been provided to Newham BID and have been converted to AutoCAD format in order to allow a review of the proposed highway alignment.
- 2.3 The proposals will not provide dedicated off street cycle facilities, on Lighterage Hill or Newham Road, thus cyclists will be required to utilise the carriageway alongside motor vehicles.
- 2.4 Based upon the proposed layout, swept path analysis has been undertaken for the largest vehicles anticipated to utilise the Lighterage Hill / Newham Road junction (16.5m articulated vehicles) and the results are provided at **Appendix B**. The analysis illustrates that the junction is not capable of accommodating turning movements via this type of vehicle without the vehicle overrunning the give-way lines (for the right turn into Lighterage Hill) or using the entire width of Newham Road (for the left turn into Newham Road).

- 2.5 The implications of these issues for cyclists are that a cyclist waiting to exit Lighterage Hill toward the new bridge, at the give way line, would be in the path of an HGV seeking to turn right into Lighterage Hill. This would put the cyclist at high risk of collision with an HGV and also could result in HGV drivers running onto the new extended pedestrian footway on the southern side of the junction, in order to avoid collision with a cyclist. This is a highly dangerous situation and should be designed out of the scheme.
- 2.6 The left turn out of Lighterage Hill onto Newham Road necessitates utilisation of the entire width of Newham Road, at a point where a cyclist approaching from the north would be faced head on with an HGV and would have no safe route of escape as there is no footway and very limited grass verge on the east side of Newham Road, as can be seen from the Google Street View image below.



View of Newham Road looking north, opposite Lighterage Hill

Guidance with respect to cycle infrastructure design

- 2.7 The most up to date guidance with respect to cycle infrastructure design is that contained within Local Transport Note 1/20 (LTN1/20).
- 2.8 Paragraph 4.5.7 of LTN1/20 sets out that a Junction Assessment Tool is provided in order to enable:

“designers to assess how well a junction provides for cycling. The JAT examines all potential movements at a junction, not just those that may be associated with a designated cycle route, to

identify the potential for conflicts and therefore what measures may be required to reduce them.”

- 2.9 There is no evidence available to suggest that this tool has been utilised and it is recommended that the tool is applied to the Lighterage Hill scheme, in order to highlight any significant issues.
- 2.10 Paragraph 4.5.8 sets out that Road Safety Audit can be utilised in order to identify potential safety issues. No Safety Audit has been provided and there is no mention of one in the consultation documents. Given the safety issues identified earlier in this report, it is recommended that a Safety Audit is commissioned, and mitigation included in the scheme where necessary.
- 2.11 Minimum acceptable lane widths for “quiet mixed traffic streets and lanes” are provided in Chapter 7 of LTN1/20 and the guidance is summarised in table 7-2, which is reproduced below.

Feature	Desirable minimum	Absolute minimum	Notes
Traffic lane (cars only, speed limit 20/30mph)	3.0m	2.75m	2.5m only at offside queuing lanes where there is an adjacent flared lane
Traffic lane (bus route or >8% HGVs, or speed limit 40mph)	3.2m	3.0m	Lane widths of between 3.2m and 3.9m are not acceptable for cycling in mixed traffic.
2-way traffic lane (no centre line) between advisory cycle lanes	5.5m	4.0m	4.0m width only where AADT flow <4000 vehicles** and/or peak hour <500 vehicles with minimal HGV/Bus traffic.

Table 7-2 of LTN 1/20

- 2.12 The proposed scheme provides lane widths of 2.85m on Lighterage Hill, below the desirable minimum for a road that only caters for cars and below the absolute minimum suggested for lanes that accommodate more than 8% HGVs, which is understood to be the case for Lighterage Hill. This suggests that encouraging cyclists to share the road with vehicles at this location is not appropriate and could lead to safety issues.

Cycle desire lines

- 2.13 Many cyclists approaching from the north may utilise the new shared cycle and pedestrian path that has been created along the east side of Newham Road, to the north of Gas Hill. Due to the gradient of Gas Hill and Lighterage Hill it is unlikely that cyclists will then cycle up Gas Hill to Newham Trail, to then come back down Lighterage Hill to the Lighterage Quay bridge, therefore cyclist are expected to proceed along Newham Road, where they will be required to share the carriageway with heavy goods vehicles and where there are no cycle facilities for approximately 250m, between the Gas Hill junction and Lighterage Hill junction. The new bridge is likely to increase cycle demand / usage on this section of Newham Road rather than the parallel section of Newham Trail and as such it is suggested that improvements should focus on that route.

Vulnerable road users

- 2.14 As mentioned in the previous paragraph, the gradients of Lighterage Hill and Gas Hill are steep, thus the route that Cornwall are focusing on is unlikely to be used by vulnerable road users such as the elderly or those less able bodied and their only option to access the bridge on foot or by bicycle would therefore be via Newham Road, which has no suitable cycle or pedestrian facilities in the vicinity of the bridge.

3 Concerns raised by other parties

Truro City Council

- 3.1 As reported on Cornwall Live, Truro City Council have 'grave concerns' about the safety of walkers and cyclists, understood to be based upon many of the same concerns raised within this report. The Council resolved at their recent meeting to recommend refusal of the planning application due to their concerns over highway safety.

Devon & Cornwall police

- 3.2 Reported again on Cornwall Live, Devon and Cornwall police have also raised concerns, with a representative stating:

"The main issue for me is how safe people will be and feel when eventually using this route especially when dark. This area is obviously primarily an industrial/commercial area so pedestrian/cycle movements should not conflict with these existing uses"

4 Newham Industrial Estate

4.1 The estate includes a large number of businesses many of which, by their nature, generate a significant volume of heavy goods vehicles and other wide vehicles. These include:

- Royal mail
- First Buses (80-100 buses per day)
- Jewson
- Conway Bailey Transport (8-10 HGV's per day)
- Howdens
- Macsalvors (plant hire – 80-100 HGV movements per day)
- Biffa (60 refuse vehicle movements per day)
- Screwfix
- South West Water
- Recycling centre

4.2 Various occupiers have provided TPA with data on typical vehicle usage (included in brackets above) and these highlight the mix of traffic that needs to be considered in the vicinity.

5 Alternative highway improvement scheme

- 5.1 Cormac, on behalf of Cornwall Council, undertook a detailed study of pedestrian and cycle access along Newham Road in 2015 and 2016. The executive summary reads as follows:

"Newham Road provides the sole means of road access to the important employment area of Newham. Beyond its junction with Gas Hill, however, it remains largely unimproved, with restricted visibility and with little or no provision for pedestrians. Although not borne out by the accident record, the road is demonstrably unsuitable for the mixture of traffic that uses it: pedestrians, cyclists and motor vehicles, including not-in-service buses and a high proportion of heavy goods vehicles."

- 5.2 The report clearly indicates the lack of suitable pedestrian and cycle infrastructure along the section of Newham Road in the vicinity of the proposed bridge. The report then considers potential improvements to local cycle and pedestrian infrastructure and concludes that 'option 14', a scheme that involves a cantilevered footway along parts of Newham Road fronting the river, is the optimum solution and would:

"deliver the widest benefits: a continuous footway/cycleway alongside the river as far as Lighterage Quay, as well as a realigned and widened carriageway"

- 5.3 The extensive research and design development undertaken by Cormac appears to have been ignored and a sub-standard solution is now being proposed that will put cyclists and pedestrians in danger.

6 Residential development at Higher Newham Farm

- 6.1 The housebuilder Vistry Partnerships is currently building out a large development to the west of Newham Industrial Estate, for 245 dwellings. Construction traffic utilises Newham Road and Lighterage Hill for access to the site and that generates around 55 vehicle movements per day, including 15 HGVs.
- 6.2 The final development is proposed to take vehicular access via Morlaix Avenue however pedestrians and cyclists from the new houses are likely to utilise Lighterage Hill and the new bridge, if constructed, as that will form the most attractive walking and cycling route between the site and Truro School as well as to Boscawen Park. This will lead to increased numbers of vulnerable road users seeking to access the bridge, who will be put at risk unless suitable enhancements to infrastructure are provided.

7 Conclusion

- 7.1 Transport Planning Associates have been instructed by Newham BID to review Cornwall Council's proposals for changes to pedestrian and cycle infrastructure on Lighterage Hill and Newham Road.
- 7.2 The proposed highway works may provide minor improvements to pedestrian safety and to the safety of cyclists at the point where the Newham Trail crosses Lighterage Hill, however cyclist safety is not protected or materially improved for those travelling between Newham Trail and the new Lighterage Quay bridge.
- 7.3 The safety of cyclists approaching from the north appears not to have been considered and the section of Newham Road between Lighterage Hill and Gas Hill is likely to be utilised by many of the cyclists that are attracted to use the new bridge as it will be far more convenient to utilise Newham Road, rather than travel up the steep hill to the Newham Trail.
- 7.4 Swept path analysis of vehicles utilising the Lighterage Hill / Newham Road junction shows that cyclists stopping at the give way lines or approaching from the north on Newham Road will be at risk of being struck by heavy goods vehicles, that require the whole width of the junction in order to pass through it. This presents a very high risk to cyclists.
- 7.5 The proposed highway works should be subject to a review based upon LTN 1/20 and an independent Road Safety Audit should be undertaken, to ensure that any safety issues are identified and mitigated.
- 7.6 A significantly better scheme of improvements to cycle and pedestrian infrastructure has previously been put forward by Cormac and it is suggested that scheme should be implemented prior to the proposed bridge being brought into operation. Without these improvements, it is suggested that the current planning application should be refused on highway safety grounds and conflict with Policy 27 of the Cornwall Local Plan and paragraph 115 of the National Planning Policy Framework.

Document Management

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Document Review

	Status	Author	Checker	Approver	Date
01	Draft	NH		NH	Sep 24
-	Issue	NH		NH	Sep 24
A	Revision ¹				
B	Revision ²				

¹
²

APPENDIX A



HEALTH & SAFETY INFORMATION

CONSTRUCTION, MAINTENANCE, OPERATION,
DECOMMISSIONING AND DEMOLITION PHASES

1. This drawing shall be read in conjunction with the Pre-Construction Information and any existing Health and Safety File(s) produced.
2. In preparation of the construction method statements consideration should be given to the close proximity of any structures that may be affected by construction.
3. The contractor shall refer to statutory undertakers' layout drawings and identify locations of existing overhead and underground services prior to carrying out excavation works.
4. Refer to the designer's risk register and the works information for full details of the residual risks associated with this work. Significant residual risks are listed here and referenced on the drawing.

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NOTES:

1. All dimensions are in metres unless otherwise stated.
2. Do not scale from this drawing.

Key:

-  Existing street lights (to remain)
-  Full height kerb
-  Dropped kerb 6mm upstand
-  Transition kerb
-  Dropped kerb 25mm upstand
-  Buff coloured tactile paving
-  Buff coloured corduroy tactile paving
-  Red high-friction surfacing
-  Wooden barriers
-  Gullies

P01	25/06/24	First Issue
REV	DATE	NATURE OF REVISION

REVISIONS



CORMAC SOLUTIONS
RADNOR ROAD
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CORNWALL TR16 5EH
www.cormactd.co.uk 01872 323 313

PROJECT TITLE:
TRURO TOWN DEAL
GREEN TRANSPORT RIVER LOOP

DRAWING TITLE:
LIGHTERAGE HILL JUNCTION

SCALE: 1:200 @ A1

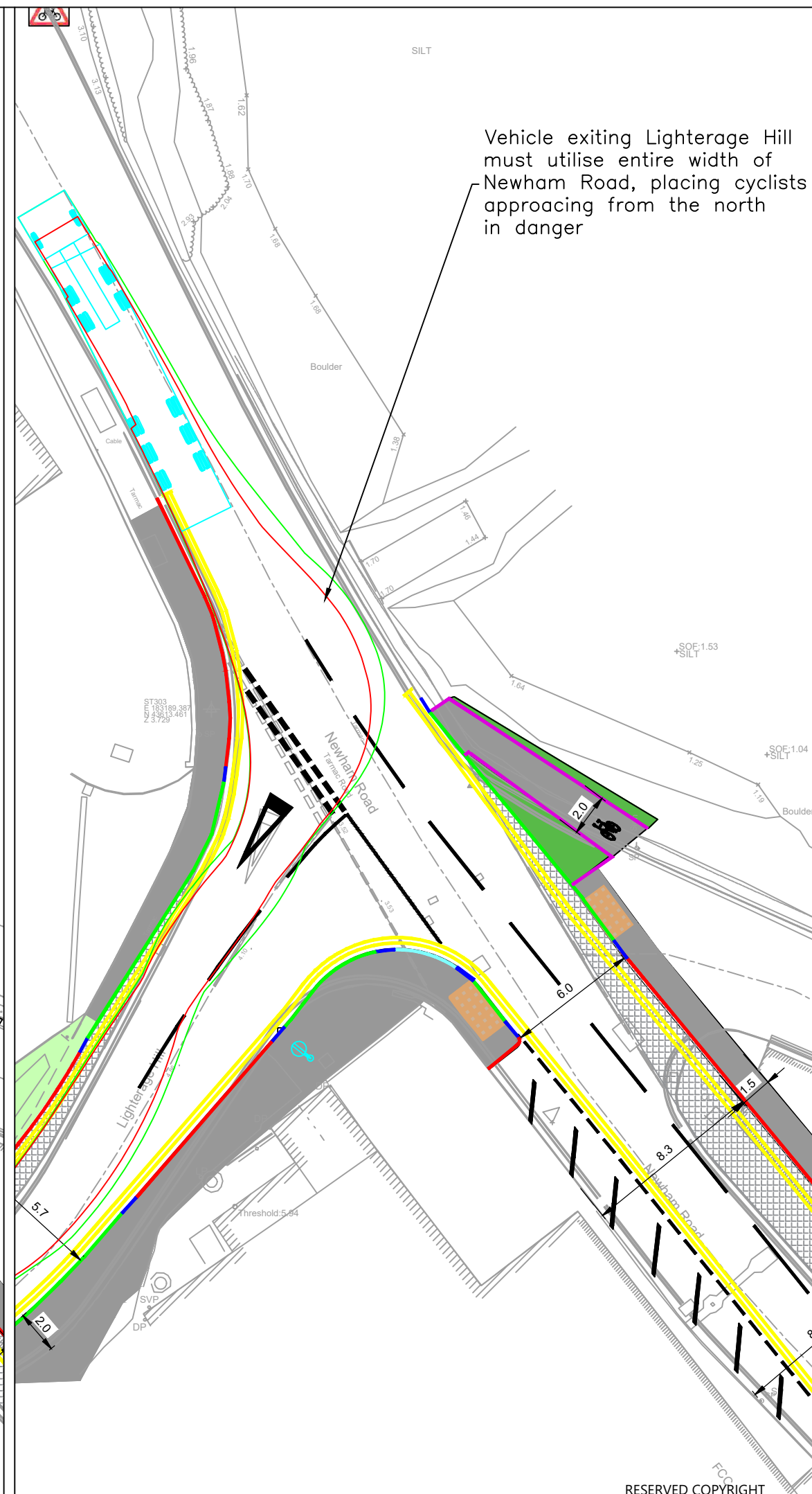
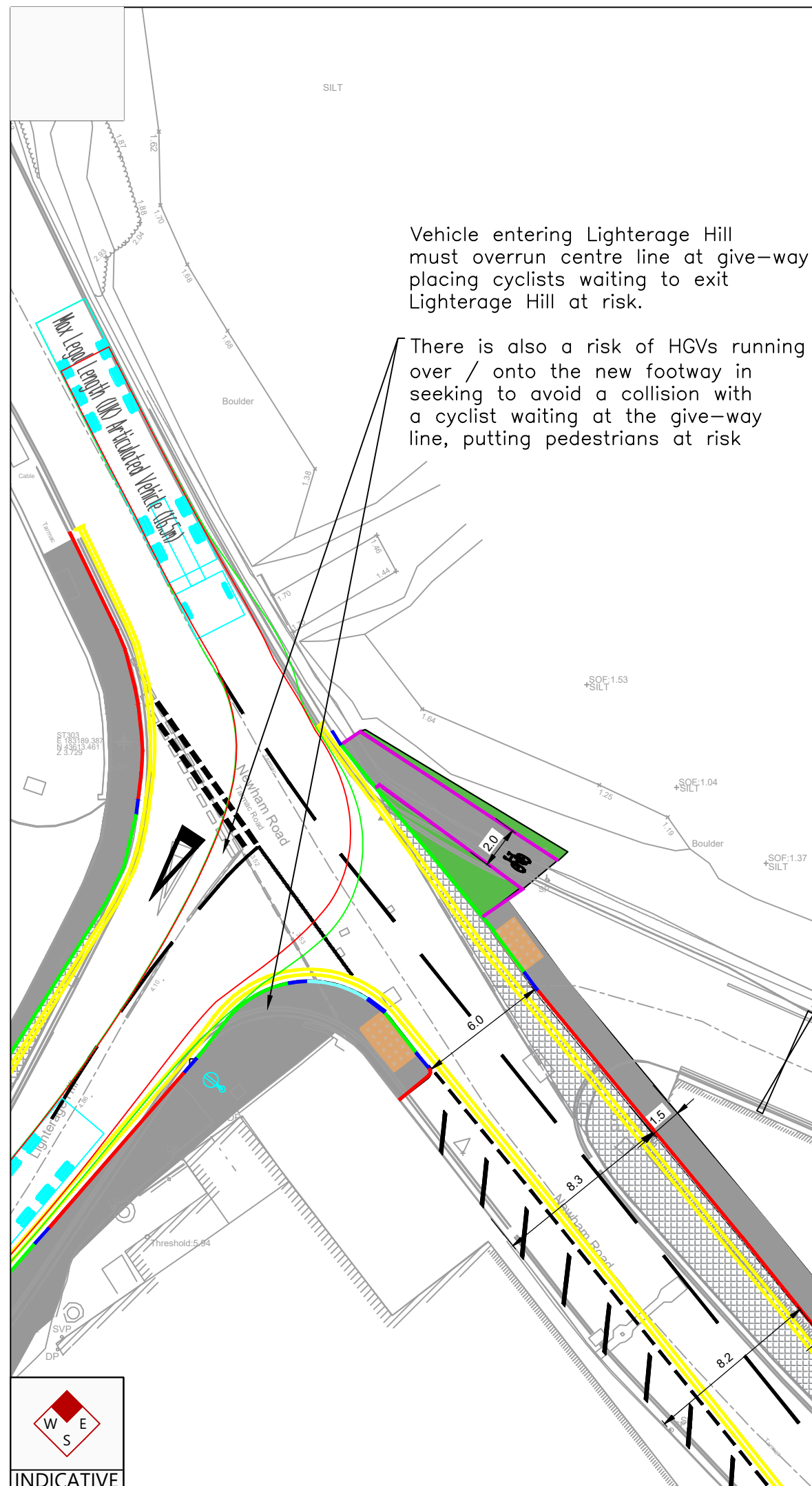
PROJECT MANAGER: JHU		DRAWN BY: HE	
CHECKED: CB	20/06/24	APPROVED: DP	25/06/24
DRAWING NO:			
PROJECT	ORIGINATOR	VOLUME	LOCATION
23-220	- CSL	- HGN	- SW8343
TYPE	ROLE	NUMBER	
DE	- D	- 0001	
PROJECT REF.:	DRAWING STATUS:	SUITABILITY:	REVISION:

Plot Date: 25 June 202

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Filename: J:\CROOKBURY\SC06\CR01\PSINERAST\PROJECT\PSI01 - PROJECT\PSINER22 230 TRURO TOWN DEAL GREEN TRANSPORT RIVER LOOP S2 PH2\02 DESIGN\WORKING FOR DEP\04 DESIGN\01 DRAWINGS\01 YPFES\01 LIGHTERAGE Hill Junction\NEWHAM TRIAL LINK OPTION 2 260624.DWG

APPENDIX B



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NOTES:

Rev	Date	Details	Drawn by	Checked by	Approved by

Bristol
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London
Welwyn Garden City



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CLIENT:

PROJECT:
Lighterage Hill
Truro

TITLE:
Swept path analysis
of a 16.5m articulated
vehicle

STATUS: **FOR INFORMATION**

SCALE: 1:250	DATE: 17/09/24	DRAWN: NH	CHECKED:	APPROVED: NH
JOB NO: 2408-037		DRAWING NO: SP01		REVISION: -