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Mr. L. Toland
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Our Ref: JPH/jph/151002

12 November 2024

Dear Mr. Toland

APP/E1885/W/22/3310099 - LEA CASTLE FARM WOLVERLEY - RESPONSE TO ANDREW WEBBER DOC RID58

As discussed, I have considered the specific points raised by Counsel, as the majority of the points raised were dealt with at the last Appeal, and my comments in response to those are already before the Inspector.

Whilst the traffic survey data shows an increase in motorcycle activity during the summer, this is unsurprising and in line with my own motorcycling activity, which is significantly greater in the summer months, as I am predominantly a fair weather rider. However, the evidence demonstrates that this has not led to an increase in collisions with HGVs on the local road network. As is apparent from collision data across the reports we have prepared, which covers the period 2014 to 2022 inclusive, only a single incident involving an HGV was recorded, which occurred in 2017 at the signal controlled junction, which did not involve a motorcycle. Given the number of HGVs recorded during the various traffic surveys, and the fact that the collision data covers the entire years within the range, it is clear that the local road network is of a sufficient design standard to safely accommodate HGV movements with other users of all types on the road network. It should be noted that contrary to Mr Webber's submission, motorcyclists are not classed as the most vulnerable road users. The most vulnerable road users are those which are not motorised, as Mr. Webber himself confirms under that heading in his note; none of which have been involved in collisions with HGVs over the same period 2014 to 2022 inclusive.

In terms of the lack of a pedestrian survey, due to the routeing of HGVs to / from the east, the potential impact is limited to that corridor, where there is a single footway on the north side of the carriageway. Whilst the proposed access will create a pedestrian crossing point, as previously identified, the collision data demonstrates that where pedestrian activity would be expected to be significantly higher than in the vicinity of the proposed access (i.e. within or close to residential and employment areas, such as on Sion Hill at junctions which accommodate significantly higher traffic movements than would occur at the proposed access) there is no evidence to suggest pedestrians are incapable of safely crossing the comparatively busier junctions with higher traffic flows, including HGVs. It is also apparent that despite this apparently being a significant concern of the objector, no pedestrian survey data has been presented to substantiate the concerns raised, despite the original application being lodged several years ago. Based on the lack of activity observed during several site visits, pedestrian flows in the vicinity of the Appeal Site access are low. I can recall seeing a pedestrian at the most recent meeting with Counsel, but the level of activity appears to be significantly lower than is apparent within the more urbanised areas locally, which I visited several times when reviewing the local road network.

In summary, the evidence demonstrates the proposed development should not have a material or significant adverse impact on highway safety.

Yours Sincerely

Jeremy Hurlstone
for THE HURLSTONE PARTNERSHIP
