

Fw: PA/2026/164 and PA/2026/190 - Cumberworth Lodge

Development Management

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Sent: 13 March 2026 08:49

To: Planning <Planning@northlincs.gov.uk>

Subject: Fw: PA/2026/164 and PA/2026/190 - Cumberworth Lodge

Please see public comment to upload to the web.

Kind regards

Planning Duty Officer

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I would like to comment on the Transport Statement that is attached to application numbers PA/2026/164 and PA/2026/190.

The cycling maps in paragraphs in 3.5.2 and 3.5.3 of the transport statement show that only small and very villages fall within the catchment areas. The possibility of finding any of the skilled staff needed for a special school in those villages is small. The possibility of finding one who is a determined cyclist is close to zero. Paragraph 3.6 shows that there isn't a bus service that could be used by staff.

The result is that all staff members and visitors will arrive by car.

Paragraph 4.1.4 details 4 parking spaces for the care home. There is only 1 visitor space, so if family members or multi-disciplinary team members for one or more of the children arrive at the same time, they will have to park out on the road.

There are 23 parking spaces for the school. There are no spaces for minibuses. Any minibuses at the school during the day, or arriving to pick up or drop off pupils, will have to park on the road.

The school is intended for 50 SEMH pupils so there will be around 30 staff together with many professionals visiting daily.

This could add up to a large number at busy times, but a conservative figure for this purpose might be 40 in total. Any overspill from the care home would be added to this figure.

This means that at least 17 cars, together with any minibuses, would be parked on Main Street with some of them close to the crossroads with the A161.

This would block the view for vehicles leaving the car park and reduce the width of the road so that two large vehicles could not pass each other safely on Main Street. This dangerous situation would be made worse as the cars would need to turn round in the road, because most of them would arrive and depart via the crossroads. The danger to any pupils leaving the premises on foot would be increased also.

Any of the external professionals arriving for the start of the school day or finishing at the end of it, would add to the peak time vehicle movements.

The figures in paragraph 5.5 predict that only 14 vehicles will arrive at the school between 8am and 9am and 3 will depart.

The figures for 5pm – 6pm are 6 vehicle arrivals and 9 departures.

The reason for choosing the 5pm – 6pm as the peak afternoon time slot is not clear because, as with all schools for primary and secondary age pupils, the peak is likely to be in the hour before that.

The arrival and departure of 50 pupils and around 40 adults would generate many times more vehicle movements in the morning and afternoon peak hours than this.

Paragraph 115 of the National Planning Policy Framework (NPPF) states 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, following mitigation, would be severe, taking into account all reasonable future scenarios.'

The inclusion of the word 'or' in the middle of the paragraph is important. This means that either of them can be grounds for refusal on their own.

This development would have an unacceptable impact on highway safety at the crossroads.

Paragraph 5.6 mentions '30 two-way trips in any peak hour on the highway network'. This figure is not mentioned in the NPPF.

The problem in the afternoon would be at the junction of Main Street with the A161, as most of the vehicles would leave in that direction. There is room for 7 or 8 cars to queue between the exit from Cumberworth Lodge and the junction. After that they would be backed up into the car park. If any tried to leave the car park before there was space, they would block cars turning off the A161 into Main Street.

Added to this would be all of the cars parked on Main Street trying to turn round in the road and join the queue; at the same time as local traffic would be trying to pass in both directions along Main Street.

The exit from Main Street to the A161 requires great care and patience as the visibility is restricted when looking left (to the south), due to the curve in the A161 at that point.

The stream of drivers frustrated by the situation while trying to leave Cumberworth Lodge, from the car park or the road outside, would have an unacceptable impact on highway safety at the crossroads as they tried to exit Main Street across the traffic on the A161, at the busiest time of day.

There would be an unacceptable impact on highway safety caused by the cars parked on Main Street during the day, also.

Pages 1 – 15 of the second section of Appendix B (that for the Proposed Use) give the data chosen from the TRICS database for use in the modelling.

The traffic movement modelling is based on data from seven single day, manual surveys.

Two of the surveys were conducted 23 years ago, one 16 years ago and two are not dated.

The surveys that were chosen took place on a single day at: -

- A Community Centre in Carlisle
- A Training Centre in Spennymoor, Durham
- A Community Arts Centre in Stevenage
- A Community Education Centre in Leicester
- A Community Education Centre in Newport, South Wales
- A Community Learning Centre in Birmingham
- An Adult Education Centre in Birmingham

Their locations are shown as: -

High Street - 1 institution
Industrial Zone - 1 institution
Residential Zone - 3 institutions
Retail Zone - 2 institutions

The populations living within 5 miles of the institutions are: -

50,001 to 75,000 - 2 institutions
125,001 to 250,000 - 2 institutions
250,001 to 500,000 - 1 institution
500,001 or more - 2 institutions

The institutions were all in busy locations and were close to large or very large populations. The public transport is likely to have been much better than a rural area, with frequent buses. This will have reduced the number of vehicle movements in the surveys, as many of the visitors will not have needed to travel by car.

All of the institutions will have been attended by adults and their arrivals and departures will have been staggered throughout the day, due to attendance at different sessions. They will not have been required to attend for the full day.

The table of total vehicle movements on page 8 shows that the vehicle movements were distributed throughout the day, rather than having large peaks at the start and end of the day as is the case at schools.

None of the institutions chosen is a school and none of them is located in a rural area.

The estimates of the vehicle movements that would be generated at peak times by the proposed development are wrong, as the data selected for the model are not applicable to a school or to a rural area.

The estimates understate the peak number of vehicle movements at a school by a very large margin. The true numbers would represent a significant volume of traffic movement, in that location.

Paragraph 2.5.4 of the transport statement quotes from North Lincolnshire's Policy T1:

'Location of Development – states that development proposals, which generate a significant volume of traffic movement, will be permitted provided that they are located:

- i) in the urban area of Scunthorpe and Bottesford, Barton upon Humber, Brigg, and the areas identified for development at the South Humber Bank and Humberside International Airport; and
- ii) where there is good access to rail, water and air transport, or to the North Lincolnshire Strategic Road Network; and
- iii) where there is good foot, cycle and public transport provision or where there are opportunities for foot, cycle and public transport to be provided.'

According to Policy T1, a development such as this should be located in Scunthorpe and Bottesford, Barton upon Humber or Brigg. Doncaster should be added to the list in this case due to

the preference stated in the Planning, Design and Access Statement for children from Doncaster.

Additionally, the development should not be located in Graizelound as it does not have good foot, cycle or public transport provision.

I would suggest that the application should be refused due to its unacceptable impact on highway safety (NPPF) on Main Street and at the crossroads in Graizelound due to its inappropriate location in a small village (Policy T1). Also, it is not a sustainable development as it will cause many extra car and minibus journeys as it is too far from a town.

Yours faithfully,

 Armstrong

