

8. GCC Highways Officer letters of 14 August 2018 and
10 January 2019



Highways Development Management

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Adrian Walker
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Please ask for: Mark Sweet

Our Ref: C/2018/041191

Your Ref: 18/02520/FUL

Date: 14 August 2018

Dear Adrian Walker,

TOWN AND COUNTRY PLANNING ACT 1990 HIGHWAY RECOMMENDATION

LOCATION: Land South Of Wick House East End Fairford Gloucestershire GL7 4AP

PROPOSED: Erection of two dwellings

The application proposes two new large four bedroom dwellings on the site on a former tennis court access via a narrow unbound shared access drive

There have been a number of local objections on highway grounds that the site fails to provide safe and suitable access due to its narrow width, restricted visibility and creating risk of conflicts with vehicles and pedestrians.

The site access visibility splays have been based on just one ATC speed survey west of the site access onto the A417 London Road. In accordance with DMRB TA 22 81 guidance speed surveys should be undertaken at the extents of the available visibility which should be either side of the site access to record approaching vehicle speeds in both directions. Due to the changing geometry of the A417 and visibility it is considered surveyed speeds for westbound vehicles may be different than recorded by the ATC counter east of the site access. However it is considered that visibility in accordance with previous county wide speed surveys of average 85th percentile speeds of 54m can be attained to the north east of the site access. The emerging visibility splays for eastbound vehicles and forward visibility are suitable.

The Department for Transport (DfT) have written to Local Highway Authorities on the 25th July 2018 advising of the publication of the Inclusive Transport Strategy 2018 and have requested that we pause the introduction of new shared space schemes. The Local Highway Authority will not be agreeing any shared space schemes at Planning or Technical Approval stage at the

moment until further advice and the updated guidance is published. The concern is that shared space is not in the interests of disabled people who are a protected group in the Equalities Act and find it difficult to navigate level surfaces when the kerb between the road and pavement is removed. This position is also supported by the replacement National Planning Policy Framework (NPPF) Paragraph 110 (a,b,c) that was published on the 24th July 2018 that states the following:

NPPF Paragraph 110: Within this context, Applications for development should:

- a) Give priority to pedestrian and cycle movements, both within the scheme and with neighbourhood areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) Address the needs of people with disabilities and reduced mobility in relation to all modes of transport
- c) Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

The DfT has suspended Local Transport Note 1/11: Shared Surface whilst it carries out further research and produces updated guidance to advise on how shared surface designs can be made inclusive and accessible. At the present time it is the position of the Local Highway Authority that shared surface designs are contrary to Paragraph 110 of the NPPF unless it can be robustly demonstrated how these requirements have been addressed. The proposed two large dwellings on the site are proposed to be accessed via a flush shared space driveway which also serves several other existing dwellings which which is a narrow level shared surface drive and is therefore contrary to paragraph 110 of the new NPPF and DfT Inclusive Transport Strategy 2018. The developer would be required to provide a segregated pedestrian pathway clear of vehicle swept paths for two-way passing of expected vehicles with inter visibility accounting for surveyed or calculated design speeds. It is not clear from the submitted plans if a suitable segregated pathway can be provided and in the absence of this evidence I am unable to determine if safe and suitable access for the additional pedestrians and vehicles can be accommodated.

The swept path tracking plans included in the Access Appraisal Note May 2018 only illustrate two-way swept path passing for two estate cars at the access adjacent to the A417 and only a one way tracking of an estate car into the site along the long narrow shared access track into the site which is over 100m in length without two-way simultaneous or inter-visible passing to accommodate suitable calculated sight stopping distance within the restricted width of the shared access track. Objections have included evidence of the restricted nature of the long shared access track to the site to accommodate vehicle passing and it is clear that two-way simultaneous passing is not possible along significant parts of the access track, however within the existing bends and width available on the access track it has not been demonstrated if there is suitable two-way inter-visible passing within limited width of the site red line allowing for calculated sight stopping distance and a clear segregated pedestrian pathway to the proposed dwellings.

Regarding servicing due to the distance of the proposed dwellings over 100m from the highway it is beyond the recommend maximum waste collection distance for collection crews or occupants to move waste bins/containers. In addition no bin collection point has been illustrated clear of vehicle and pedestrian spaces and routes for existing and proposed dwellings.

The parking and turning space for vehicles to exit the frontage of the two dwellings is tight and it is poor design that forward gear exiting of especially the southern dwelling requires a 5-point turn and both dwellings require turning space across the other proposed dwellings frontage which could for large properties be obstructed visitor or occupant parking beyond their garage and single parking space. However it is considered by widening the access into the dwellings clear turning space for each dwelling may be achieved. No emerging visibility splays onto the shared drive have been provided fronting the proposed dwellings which would require pedestrian and vehicle splays over frontage boundary treatment, which may be provided subject to further details.

Therefore I recommend refusal on the basis that there is insufficient evidence to demonstrate that a suitable segregated pedestrian footway to the dwellings along the shared access track can be provided or two-way inter-visible swept path passing within the site red line to accommodate passing of the typical largest expected vehicles for existing and site occupants and pedestrians. The application is therefore contrary to paragraphs 108 and 110 of the National Planning Policy Framework and the Local Plan.

Statement of Due Regard

Consideration has been given as to whether any inequality and community impact will be created by the transport and highway impacts of the proposed development. It is considered that no inequality is caused to those people who had previously utilised those sections of the existing transport network that are likely to be impacted on by the proposed development.

It is considered that the following protected groups will not be affected by the transport impacts of the proposed development: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, other groups (such as long term unemployed), social-economically deprived groups, community cohesion, and human rights.

Yours sincerely,

Mark Sweet

Development Co-ordinator



Highways Development Management

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Please ask for: Richard Jefferies

Our Ref: C/2018/041191

Your Ref: 18/02520/FUL

Date: 10 January 2019

Dear Adrian Walker,

TOWN AND COUNTRY PLANNING ACT 1990 HIGHWAY RECOMMENDATION

LOCATION: Land South Of Wick House East End Fairford Gloucestershire GL7 4AP

PROPOSED: Erection of two dwellings

I refer to the above planning application in regards to the submission of revised/amended plans, supporting document from CTP ref: CTP-18-163 including a Road Safety Opinion received on the 27th November 2018 with Plan Nos: SK04, SK05, SK06.

I recommend that no highway objection be raised subject to the following condition(s) being attached to any permission granted:-.

1. Prior to the occupation of the development hereby permitted the existing hedge as shown on submitted plans SK05 and SK06 shall be cut back to provide the required visibility splays and pedestrian passing places and shall be maintained thereafter.

REASON: To ensure that safe and suitable access to the site can be achieved for all users in accordance with paragraph 108 of the National Planning Policy Framework.

2. The buildings hereby permitted shall not be occupied until the vehicular parking and turning and loading/unloading facilities have been provided in accordance with the submitted plan drawing no. 2596P(1)111 rev B, and those facilities shall be maintained available for those purposes thereafter.

Reason:- To ensure that a safe, suitable and secure means of access for all people that minimises the scope for conflict between traffic and cyclists and pedestrians is provided in accordance with the paragraphs 108 and 110 of the National Planning Policy Framework.

3. The vehicular access hereby permitted shall not be brought into use until the existing roadside frontage boundaries have been set back to provide visibility splays extending from a point 2.4m back along the centre of the access measured from the public road carriageway edge (the X point) to a point on the nearer carriageway edge of the public road 40m left (West) and 39m right (East) (the Y points). The area between those splays and the carriageway shall be reduced in level and thereafter maintained so as to provide clear visibility between 1.05m and 2.0m at the X point and between 0.26m and 2.0m at the Y point above the adjacent carriageway level.

Reason:- To avoid an unacceptable impact on highway safety by ensuring that adequate visibility is provided and maintained to ensure that a safe, suitable and secure means of access for all people that minimises the scope for conflict between traffic and cyclists and pedestrians is provided in accordance with paragraphs 108 and 110 of the National Planning Policy Framework.

4. Prior to the occupation of the buildings hereby permitted, the proposed car parking spaces shall be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Reason: - To ensure that the development incorporates facilities for charging plug-in and other ultra-low emission vehicles in accordance with paragraph 110 of the National Planning Policy Framework.

5. Throughout the construction [and demolition] period of the development hereby permitted provision shall be within the site that is sufficient to accommodate the likely demand generated for the following:

- i. parking of vehicles of site operatives and visitors;**
- ii. loading and unloading of plant and materials;**
- iii. storage of plant and materials used in constructing the development;**
- iv. provide for wheel washing facilities**

Reason: To reduce the potential impact on the public highway and accommodate the efficient delivery of goods in accordance with paragraph 110 of the National Planning Policy Framework.

Statement of Due Regard

Consideration has been given as to whether any inequality and community impact will be created by the transport and highway impacts of the proposed development. It is considered that no inequality is caused to those people who had previously utilised those sections of the existing transport network that are likely to be impacted on by the proposed development.

It is considered that the following protected groups will not be affected by the transport impacts of the proposed development: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, other groups (such as long term unemployed), social-economically deprived groups, community cohesion, and human rights.

Yours sincerely,

Richard Jefferies
Technician

