



Fradley and Streethay Parish Council

Marketing Suite Office, Wellington Crescent,
Fradley Park, Lichfield, Staffordshire WS13 8RZ
Telephone: 01543 444233

Website: www.fradleyandstreethayparishcouncil.gov.uk
Email: clerk@fandspc.org

Chairman of the Council: Cllr Simon Roberts
Clerk to the Council: Mrs Clare Orme

Date: 7 October 2020

To: Vanessa Morgan
Lichfield District Council,
Development Control,
Lichfield District Council House,
Frog Lane,
Lichfield,
WS13 6YY

APPL REF: 20/01178/FULM - Full planning application for a residential development with associated works and public open space, and access from Horner Avenue and Ward Close, Land Off Horner Avenue, Fradley
REPRESENTATIONS BY FRADLEY PARISH COUNCIL

Introduction

1. These representations have been prepared by Fradley Parish Council in response to planning application 20/01178/FUL (land off Horner Avenue). The Parish Council hereby OBJECTS to this application for the reasons given below.

Loss of employment land

2. The application rightly identifies that a key policy matter is the designation of the entire application site within an Existing Employment Area. The Planning Statement correctly lays out the test of an application proposing uses other than B-class employment (from Local Plan Policy EMP1). However, the Parish Council does not consider that the tests in Policy EMP1 have been met such that residential uses are permissible. The Planning Statement considers that the matter of access is the key issue and asserts that (i) it is not possible to access the site from any point other than Horner Avenue; (ii) it is not safe for employment traffic to use this access; and (iii) the volumes of traffic created by a commercial scheme would be unacceptably high. We address each of these points in turn.
3. The evidence in the Planning Statement shows that all other possible points of access have been considered. In the opinion of the Parish Council, the most logical alternative would be from Fradley Park South through the Legal & General (L&G) land. Evidence that this route is not available is provided in Appendix 7 to the Planning Statement. We make two points in response to this assertion by the applicant:

- a. This land has been designated as part of a wider strategic employment area, of fundamental importance to providing jobs and to Lichfield District Council achieving its employment objectives over the Local Plan period (and, we note, over the new plan period given that the designation is proposed to be retained in the Local Plan Review). To simply allow a large area of strategic employment land to be lost because, at a particular point in time, a neighbouring landowner was not willing to entertain permitting access, flies in the face of the purpose of plan-making.
 - b. At the bottom of the email correspondence in Appendix 7 to the Planning Statement, the applicant's agent requests that L&G 'state/confirm the following'. We only see part of what they are being asked to state as the remainder of the email is not included. However, it is evident that the approach by the applicant to L&G was designed in a way to ensure they received the response they were looking for. In terms of the justification of the loss of a parcel of strategic employment land, it is bereft of any evidence that this is the view of L&G. Indeed, given that L&G's interests consist of large logistics warehouses, then it is clear they may not wish for residential access to be provided adjacent to these activities. Yet this is not the required test of Policy EMP1 which relates to the potential for the use of the land for employment activities to cause site-specific environmental problems. In this regard, the applicant has failed to address the requirements of Policy EMP1.
4. The Planning Statement addresses the potential for vehicular traffic created by employment uses to access the site from Horner Avenue. As is stated in paragraph 4.20 of the Planning Statement, their transport model is unable to distinguish between different B-class employment uses, specifically logistics (B8) and office/light industrial (B1). The analysis therefore assumes that a significant proportion of the vehicular traffic created by any employment scheme would be heavy goods vehicles (HGVs). For an office (B1a) or light industrial (B1c) scheme this simply cannot be said to be the case. Therefore the applicant has failed to adequately make the case.
 5. The Planning Statement addresses the volume of traffic that would be created by an employment scheme. Paragraph 4.22 states that 202 two-way vehicle trips would be created during the morning peak and 169 two-way trips in the afternoon peak. This compares with 55 and 52 two-way trips respectively under the proposed residential scheme. However, the applicant presents no evidence as to where these figures for a commercial scheme have come from, including what assumptions are made about the scale of development and the split of commercial uses. Moreover, the Planning Statement references a meeting with the Highway Authority in June 2019 and summarises, "At this meeting the Highways Officers shared the view that the identified vehicular access points into the site (via Horner Avenue and Ward Close) were unacceptable for large vehicles and traffic associated with employment uses generally." The Parish Council agrees that this access point is not suitable for large vehicles, however the subsequent statement lacks any form of qualification. Paragraph 109 of the NPPF states, "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." It must therefore hold true that to prove employment uses are not acceptable on highways grounds, it must be demonstrated that these uses would have an unacceptable impact on highway safety or a severe cumulative impact on the road network. This has not been

demonstrated by the applicant, nor has this been stated as the opinion of the Highway Authority.

6. It is the opinion of the Parish Council that the evidence presented to justify the loss of employment land under Policy EMP1 does not make a justifiable case.
7. Related to this is the assertion by the applicant that there would be no demand for office space on the site. This appears to be predicated on the basis that it is adjacent to warehousing activities. The Lichfield and Tamworth Housing and Economic Needs Assessment 2019 provides contrary evidence regarding the general need and demand for office space. Figure 45 shows that office supply is well below take-up, with paragraph 10.13 confirming supply to represent 0.2 years' worth of take up. It describes this as being "a very low level". Table 47 shows that the take-up of office space in Lichfield has predominantly been small units, i.e. 0-185m². As is shown in Table 53, even under a baseline scenario, there is a significant need for office floorspace (a minimum of 3.2 hectares of land). It is therefore clear that there is a need to protect employment land with the potential to accommodate office space in the best locations. The report considers one of these locations to be Fradley Park (along with Lichfield City Centre and Lichfield South). It is therefore clear that there is no justification to release the land on account of the lack of demand for office space and the absence of any comprehensive marketing or financial appraisal of the site is telling in this regard. The proposals simply lack any evidence to justify release of the site from employment use.

Biodiversity net gain

8. Paragraph 170 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by providing net gains for biodiversity. This is embedded in the Government's 25-year environment plan. Policy NR3 of the Local Plan specifically requires a net gain in biodiversity in order for development to be permitted. Despite this, the application does not address the matter in a satisfactory or convincing way. The supporting Ecological Assessment recognises the need for net biodiversity gain and states that a Biodiversity Metric has been produced to determine how the proposals can achieve net gain. The assessments of habitat and hedgerow units both show gains under the proposals. The Parish Council would make two responses to this. First, when viewing the Design and Access Statement there is little evidence as to how or where on the site hedgerow provision will be increased. Second, the net increase in habitats must be explained more clearly given that the Ecological Assessment is clear that the scheme would result in the loss of bat habitats, however small. This issue was raised by the community through the consultation (Design and Access Statement, para. 4.5.5) yet nothing has been done to mitigate the impact, e.g. the provision of bat boxes on new houses and demonstration that the layout will maximise the potential for bats to remain present, no matter how small the numbers.
9. The proposals for two attenuation ponds fail to demonstrate how they will maximise the potential for biodiversity gain (despite paragraph 6.2.2 of the Design and Access Statement saying that the proposals have done this). Just putting a pond in does not guarantee that biodiversity will be maximised. It is important that further evidence is provided as to how

this will be done. It should also make an attractive space for the community to use otherwise it cannot reasonable be considered to represent public open space.

10. It is not considered that the proposals have demonstrated that the scheme can meet the requirements of national policy or Local Plan Policy NR3.

Open space provision

11. In the Planning Statement, the applicant calculates the open space provision required, as per the Developer Contributions and Housing Choices SPD. This creates an overall requirement of 1.01 hectares across the various types of open space. Paragraph 4.39 of the Planning Statement states that the proposals only provide 0.5 hectares of on-site public open space. It then claims that, by bringing into use the existing ribbon of open space running along the north-eastern boundary, this somehow creates a further 1.1 hectares of provision. To come to the conclusion that existing public open space should contribute towards a requirement for new public open space is perverse. Moreover, the space in question has been neglected by its owners, Fradley Park Industrial Limited, since they purchased it in 2016, making it difficult to be enjoyed by the public. This public open space was part of a previous S106 agreement under planning application ref. 01/01256/OUT.
12. Against the obligation to meet the open space requirements, the proposals make no provision for outdoor sports or allotments. A site such as this, close to the existing community, would be ideal for allotment provision and the Planning Statement notes a requirement for 3.6 allotment plots "if a local need is identified" (para. 4.39). No evidence of whether local need has been identified is included in the application and the Parish Council were not consulted about this by the applicant.
13. The layout proposed in the Design and Access Statement shows the only parcel of informal open space as being located adjacent to the A38 road. Given that users of the informal space will be outdoors and therefore open exposed to the pollution created by large amounts of vehicular traffic only a matter of metres away, it is considered that the planning application conflicts with the requirement in paragraph 170 of the NPPF that applications prevent new development from being adversely affected by air and noise pollution.
14. It should also be brought to the planning authority's attention that the row of houses closest to the A38 road – accompanied by minimal landscaping or acoustic screening – are affordable units. The Parish Council urges the planning authority to ensure that it is completely satisfied that these units will not be subject to unacceptable levels of air pollution and noise from the road traffic.
15. The proposed access to the site will cut through an existing area of public open space. This will result in severance of green space that the application states is vital to meeting its open space requirements.

Housing Need

16. Policy FRANP12 of the Fradley Neighbourhood Plan supports the provision of 2- and 3-bed units “that demonstrably meet the needs of older people or are capable of adaptation to meet such needs”. The application appears to consider that the provision simply of 2- and 3-bed units is sufficient. There is no evidence that (i) any units have been designed to meet the needs of older people, e.g. bungalows; or (ii) that the 2- and 3-bed units will be designed in a way that they can be adapted.

Highway matters

17. The Fradley Neighbourhood Plan highlights that the Turnbull Road junction is a pinch-point and that further traffic through Fradley South would be detrimental. Since the Neighbourhood Plan was prepared a 90-bed dementia unit has been constructed on Worthington Road which will add to the traffic volumes accessing this junction. It is vital that the impact of this is addressed in the Transport Assessment to the satisfaction of the Highway Authority.
18. The emergency access is proposed via Rogerson Road. The screen grab image below shows that cars are regularly parked along this road and therefore access for larger emergency vehicles such as fire engines could be restricted.

Parked vehicles along Rogerson Road (Source: Google Maps)



19. The Parish Council has spoken to the Highway Authority and their opinion was that the double-yellow lines would have to be put on Rogerson Road and Ward Close, with extra parking then provided to mitigate the impact on existing residents. The application does not propose extra parking and clearly there are no reasonable options to provide parking in close proximity to these existing residences.

20. Appendix 1 to the Planning Statement is the note of a meeting between the applicant and the Highway Authority. The note suggests that the Highway Authority is content with the various access arrangements, including for construction traffic. This meeting however was on 12th June 2019 and at that time, construction access onto the site was proposed to be from the petrol filling station/shop site on the A38. Appendix 8 to the Planning Statement is a letter from Highways England, dated 17th July 2019, which effectively rules out this access on safety and vehicle parking grounds. Given that the Highway Authority meeting pre-dates the advice from Highways England, it is unclear from the application what the position of the Highway Authority is now regarding construction traffic and the maximum size of vehicles that Horner Avenue could accommodate. Appendix 3 to the Planning Statement states at paragraph 5.3 that 16.5m HGVs cannot safely use Horner Avenue. It should also be noted that, in terms of swept path analysis, the only vehicles considered were 16.5m HGVs and refuse collection vehicles. Construction will require access for a wider range of vehicle types. Unless the applicant can provide evidence of legal access to a 'staging post' to transfer construction materials from 16.5m HGVs to smaller vehicles, then the approach to construction is inappropriate.
21. The Parish Council has commissioned a detailed review of the highways proposals and this is included as an appendix to these representations. It is considered that the current development proposals for an additional 115 dwellings are deficient in the following ways:
1. The current application does not appear to be supported by an independently produced Road Safety Audit Stage 1.
 2. The current Fradley South road network that would be utilised by the proposed development does not currently conform to Staffordshire County Council's Design Guide standards in some locations.
 3. Implementation of the current planning application development as proposed does not comply with the Staffordshire Design Guide, as the already 'below standard' highway layout would be made considerably worse with regard to compliance with standards.
 4. To accommodate the number of dwellings proposed from the existing road network within Fradley South as shown by the applicant, a loop arrangement would be required which would necessitate substantial upgrades to both Horner Avenue and Ward Close.
 5. The section of Horner Avenue to the east of the 'Tee' junction would have to be improved which does not appear possible within the current housing layout. Two corners would have to be provided changing the layout from 'Tee' arrangements to bends with a minimum 15m radius and the appropriate forward visibility provisions.
 6. The southern section of Ward Close off Rogerson Road would have to be improved which does not appear possible within the current housing layout. Two corners would have to be provided changing the layout from 'Tee' and turning head arrangements to bends, with a minimum 15m radius on the bends and the appropriate forward visibility provisions.
 7. These two changes would provide for a total of 200 dwellings (approximately 100 off each half of the loop) and the current 115 dwellings when added to the existing numbers served would be 174 and hence this solution would be acceptable.
 8. Even if the total number of dwellings was reduced substantially to within the Design Guide threshold for the current road specifications, the "Emergency Access road / Temporary Access for Sales Complex" would not be acceptable crossing what

appears to be a private driveway or be connected to the current turning head arrangement.

9. Therefore, it is the professional opinion that in its current form, the proposed development could not be implemented within the Highway Authority's published design standards.
10. The current proposals would seriously exacerbate the already poor highway layout and lead to substantially increased road safety issues.
11. The changes necessary to make the vehicular access compliant with design standards would require substantial changes to the existing network that would necessitate removal of four, possibly five dwellings.
12. There would be a considerable volume of construction traffic associated with the delivery of this application which would have a harmful effect on the streets of Fradley South, with little prospect of any mitigation being possible.
13. In its current iteration the application cannot be delivered within the public highway whilst meeting the Highway Authority's design standards; hence would not be a safe layout and should be refused planning permission.

Noise and odours

22. The acoustic measurements in the Noise Assessment were not taken at the peak of either rush hour. Therefore, they will be an under-representation the traffic noise from the A38. The times they were recorded were 0500 and 0700h and 0930 and 1230h.
23. Furthermore, the former Great Bear depot was being wound down at the time of the survey and the new operators that have taken it over now have a very busy depot with new buildings and extra capacity. Again, noise will be greater than measured.
24. The noise assessment identifies in paragraph 5.34 to 5.37 that a significant number of residential properties will need ventilation provided by means other than simply opening a window. Paragraphs 6.21 and 6.22 then explain what mitigation is provided to address this. They state:
 - “6.21 There are a number of different ways of providing the suitable levels of ventilation to control overheating and achieve the required internal noise levels. These include mechanical systems or providing windows which when in the open position provide a greater external to internal noise reduction.
 - 6.22 Once the properties at risk of excessive internal temperatures has been identified by others a further review could be required.”
25. What is clear is that the residents of many properties will be unable to open their windows for significant parts of the day and night (in order to cool their properties) without being subjected to unacceptably high levels of noise. Moreover, it would appear from the conclusion in paragraph 6.22 that acceptable mitigation has not been provided.
26. At the south western corner of the site is a sewage pumping station which sometimes gives rise to unpleasant odours. No assessment of the impact of this on the amenity of residents

has been undertaken. Again, it is notable that the properties nearest to the sewage works are the affordable properties.

Other matters

27. Drawing reference 'Jsl3588-rps-xx-ex-dr-l-9001_p03_fradley_landscape 01' shows a number of trees well outside the red line boundary being proposed for removal. The application does not explain why this is necessary nor that it has the approval of the landowner in question. These same trees were included in an earlier proposal by the applicant when their intention was to use this land as a staging post for construction vehicles. This proposal was dropped because the access from the staging post to the site was across land owned by the Parish Council and it did not wish to allow the loss of trees solely for the purpose of providing construction access. There is no justification for why these trees are proposed for removal.
28. Drawing reference 'Jsl3588-rps-xx-ex-dr-l-9001_p03_fradley_landscape 01' also shows an area within the red line boundary annotated with the words, 'Refer to Tree Surgery where mounds are to be removed'. These mounds were created to minimise the visual intrusion by the large warehouse building occupied by Tile Giant for residents of properties on Godfrey Drive when that development was constructed. There is no justification for the removal of this visual protection for those properties.

Yours Sincerely

CMOrme

Clare Orme
Clerk/RFO to Fradley and Streethay Parish Council

Appendix:

Planning Application: Land Off Horner Avenue, Fradley, 20/01178/FULM

Report on Road Safety Problems Caused by the Proposal

Introduction

The above Planning Application proposes a development of 115 dwellings on the land south of Horner Avenue and Ward Close, Fradley South, with vehicular access from Horner Avenue and a further access off Ward Close described as “Emergency Access road /Temporary Access for Sales Complex”.

The Fradley and Streethay Parish Council has received many requests from Residents to oppose this development due to substantial concerns regarding accessing a further 115 dwellings off narrow and already problematical streets in Fradley South.

The poor safety and amenity of the street network in Fradley South is a constant problem for residents, and the Parish Council regularly receives complaints which it has raised with the County Highway Authority on numerous occasions. Adding a further 115 dwellings off the end of the narrowest and problematical routes in the estate is seen by all as an unacceptable proposal on road safety and public amenity grounds.

The Parish Council has therefore taken specialist highway and transportation advice regarding the proposals, and the following report sets out how, in the view of the Parish Council and its advisors, the application should be refused on road safety and public amenity grounds.

Report

Staffordshire County Council is the Highway Authority for the public highway network within Fradley South, and it publishes a detailed Design Guide that must be followed by all developers and their professional teams when promoting new developments in the County.

The Staffordshire Design Guide has been expressly prepared “*to create residential environments that are visually attractive, **safe**, convenient, secure and economical in both construction and maintenance.*”

Main aims of the Staffordshire Design Guide (extract from the document)

- Provide safe and convenient surroundings for the movement of people, including those with restricted mobility and cyclists.
- Create safe routes for pedestrian, cycling and vehicular movement.
- Keep vehicle flows and traffic speeds low in the vicinity of homes, and minimise the danger and nuisance created by non-access traffic.
- Ensure that reasonable, and where possible direct, vehicular access to dwellings is available, and enable easy access for public transport and emergency vehicles.
- Minimise the danger and inconvenience caused by indiscriminate on-street parking.
- Allow for a diversity of spatial, architectural, and landscape elements appropriate to the unique character of the site and its surroundings.

Therefore, if a design deviates from the Design Guide standards it is deemed to be unsafe and is likely to have many major issues which would be highlighted in an independent Road Safety Audit. There does not appear to be an independent Road Safety Audit included within the document list on the Lichfield District Council planning portal for the application. An independent Road Safety Audit is normally a requirement for a planning application such as this one.

This report identifies deviations from the Design Guide standards that would be caused should the development be permitted as proposed.

Staffordshire Design Guide describes seven types of road as its design hierarchy:

Traffic Routes

- Local Distributor (road) – to serve a large residential estate.
- Residential Spine Road (also known as a Collector Road) – up to 500 dwellings – 6m wide
- Connector Road – 100-300 dwellings – 6m wide.

Lower order Road – where the design of the road dictates vehicles should be subordinate to the needs of pedestrians/cyclists.

- Residential Spine Road (Major Access Road) – Up to 300 dwellings – 5.5m wide
- Minor Access Road – up to 200 dwellings (or Cul-de-sac up to 100 dwellings) – 5.0m wide
- Minor Access Way - up to 50 dwellings (or Cul-de-sac up to 25 dwellings) – needs a gateway (a rumble strip or ramp in the surfacing) – 3.5 to 6.0 m wide
- Housing Square (up to 10 dwellings) or Mews Court - up to 25 dwellings (or cul-de-sac up to 12 dwellings)

Horner Avenue – Existing Design Observations:

- Horner Avenue is accessed from Worthington Road.
- Worthington Road is 6.0m wide and as such is classified as **Residential Spine Road** capable of supporting up to 500 dwellings.
- The visibility from Horner Avenue onto Worthington Road should be as calculated in the national design guidance document Manual for Streets. The design speed for this road is 25mph and the required visibility is 33m which is achieved in both directions. Therefore, this junction conforms to the Staffordshire County Council standards.
- At its junction with Worthington Road, Horner Avenue is 5.0m wide with two 1.8m wide footways (measured from an O.S. digital base map).
- Approximately 50m to the south, Horner Avenue splits into a 'Tee' junction with each side of the 'Tee' reducing in status.
- The west side is 5.0m wide with 1.8m wide grass service strips either side.
- To the east the road remains at 5.0m wide but only has one footway and a grass service strip. Currently supporting 7 dwellings

Under the Design Guide standards, Horner Avenue in its current form supports a total of 32 dwellings. Thus, in the current layout, the first 50m long section of Horner Avenue is classified as a **Minor Access Road** capable of supporting up to 100 dwellings (Cul-de-sac).

However, both sections of the 'Tee' junction reduce in status, classified as a **Minor Access Ways**. This is identified by the ramped entrance treatment to the section of roadway in question; the use of grass service strips; and the low number of dwellings it serves. All these features dictate the arm off the 'Tee' junction is a **Minor Access Way** and as such restricts the number of dwellings off each arm to 25.

As the eastern arm currently supports 7 dwellings it could, under the Staffordshire County Council Design Guide, be expanded (with no modifications) by 18 dwellings to a total of 25.

Ward Close – Existing Design Observations:

- Ward Close is accessed from Rogerson Road.
- Rogerson Road is 6.0m wide and as such is classified as **Connector Road** capable of supporting 100-300 dwellings.
- At its junction with Rogerson Road, Ward Close (south) is 5.0m wide with one 1.8m wide footway (measured from an O.S. digital base map) and one grass verge.
- The junction is of a ramped 'raised table' format which denotes the reduced status of Ward Close.
- As for Horner Avenue, this section of Ward Close has a **Minor Access Way** status, with a maximum of 25 dwellings supported as it is a cul-de-sac.
- There are presently 27 dwellings supported of this section of Ward Close.

Regarding Minor Access Ways the Staffordshire Design Guide states that *“Developments of more than 25 dwellings should be served either via a loop road, designed to ensure equal traffic distribution, or with a second link to a higher category of road, normally Minor or Major Residential Access Roads.”*

Therefore, the only standards compliant way to add 115 new dwellings as proposed would be to expand the use of Horner Avenue and Ward Close by forming a loop. The loop would service a total of 174 dwellings and need to be engineered in such a way that broadly split traffic using Horner Avenue and Ward Close 50/50. To do this both routes would need to be upgraded to meet the requirements of a **Minor Access Road AND** achieve this whilst linking to another equal or higher status road (Major Access Road).

To upgrade the current eastern 'Tee' arm of Horner Avenue, a **Minor Access Way** to **Minor Access Road** standard it would have to be modified as follows:

- The junction could no longer be a 'Tee'.
- The current junction with the low 8.5m radius would have to be changed to a minimum 15m radius bend (which would also need a forward visibility splay around the bend) towards the east, with the western part being a 'Tee' off the bend.
- It must be noted that it is likely that this change CANNOT be achieved without the removal of the corner dwelling to accommodate the bend and its forward visibility envelope.
- Install a 1.8m wide footway in lieu of the grass verge on one side to provide footways on **both** sides of the road.
- Remove the ramped raised table format junction and add a rumble strip (a road surface feature) to the western arm.
- The turning head at the eastern end of Horner Avenue would be removed and replaced by a minimum 15m radius bend (which would also need a forward visibility

splay around the bend) towards the south, with the eastern part of the turning head being a 'Tee' off the bend.

To upgrade the current southern section of Ward Close from a **Minor Access Way** to **Minor Access Road** standard it would have to be modified as follows:

- Ward Close is **Minor Access Way** and as such would have to be upgraded to a **Minor Access Road** with footways on both sides.
- The existing end of road could not remain as a turning head.
- It would have to be changed to a minimum centreline 15m radius bend towards the south with the current turning head effectively being a 'Tee' off the bend.
- The bend would require a forward visibility envelope across the corner.
- It must be noted that this change CANNOT be achieved without the removal of the existing corner dwelling to accommodate the bend and its forward visibility envelope.
- This affected dwelling is one of a semi-detached pair.
- Ward Close connects to Rodgerson Road which appears to be a **Connector Road** and is therefore acceptable in road hierarchy terms.
- It is noted that the proposal shows the emergency link over what appears to be a resident's drive off Ward Close.
- It should also be noted that when the Design Guide standards refer to a 'link' it does not mean an **Emergency Link** across a driveway as shown in the planning application layout, the standards refer to a full road standard.

An indication of the extent of the upgrade works necessary is shown in the sketch below:



Construction Traffic

The above sets out how the proposed development does not conform to Staffordshire County Council's design standards related to normal use once delivered.

Notwithstanding this, the use of these streets for construction traffic would be extremely disruptive and potentially damaging to the residents and roads/footways/verges respectively. On the issue of damaging the existing roads, this is because they are not wide enough for HGVs to pass, and there would be inevitable damage to kerbs, footways and verges.

There are current issues where HGV traffic passing along Turnbull Road has caused damage to parked cars etc., and the classification of Turnbull Road is significantly higher than the cul-de-sacs proposed to be used for the application site.

It is normal to mitigate such impacts with a controlled route for construction traffic avoiding the least appropriate streets. It does not appear possible to achieve such mitigation in this instance.

Conclusions

It is considered that the current development proposals for an additional 115 dwellings are deficient in the following ways:

1. The current application does not appear to be supported by an independently produced Road Safety Audit Stage 1.
2. The current Fradley South road network that would be utilised by the proposed development does not currently conform to Staffordshire County Council's Design Guide standards in some locations.
3. Implementation of the current planning application development as proposed does not comply with the Staffordshire Design Guide, as the already 'below standard' highway layout would be made considerably worse with regard to compliance with standards.
4. To accommodate the number of dwellings proposed from the existing road network within Fradley South as shown by the applicant, a loop arrangement would be required which would necessitate substantial upgrades to both Horner Avenue and Ward Close.
5. The section of Horner Avenue to the east of the 'Tee' junction would have to be improved which does not appear possible within the current housing layout. Two corners would have to be provided changing the layout from 'Tee' arrangements to bends with a minimum 15m radius and the appropriate forward visibility provisions.
6. The southern section of Ward Close off Rogerson Road would have to be improved which does not appear possible within the current housing layout. Two corners would have to be provided changing the layout from 'Tee' and turning head arrangements to bends, with a minimum 15m radius on the bends and the appropriate forward visibility provisions.
7. These two changes would provide for a total of 200 dwellings (approximately 100 off each half of the loop) and the current 115 dwellings when added to the existing numbers served would be 174 and hence this solution would be acceptable.

8. Even if the total number of dwellings was reduced substantially to within the Design Guide threshold for the current road specifications, the “Emergency Access road / Temporary Access for Sales Complex” would not be acceptable crossing what appears to be a private driveway or be connected to the current turning head arrangement.
9. Therefore, it is the professional opinion that in its current form, the proposed development could not be implemented within the Highway Authority’s published design standards.
10. The current proposals would seriously exacerbate the already poor highway layout and lead to substantially increased road safety issues.
11. The changes necessary to make the vehicular access compliant with design standards would require substantial changes to the existing network that would necessitate removal of four, possibly five dwellings.
12. There would be a considerable volume of construction traffic associated with the delivery of this application which would have a harmful effect on the streets of Fradley South, with little prospect of any mitigation being possible.
13. In its current iteration the application cannot be delivered within the public highway whilst meeting the Highway Authority’s design standards; hence would not be a safe layout and should be refused planning permission.