
Job Title	Horner Avenue, Fradley South
Job Number	IPD-20-524
Date	22 nd January 2021
To	Fradley & Streethay Parish Council
cc	
Topic	Rebuttal Response to Applicant's Highway Access Proposals

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

Rebuttal to the Response of the Applicant to Fradley and Streethay Parish Council Consultation

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 (F&SPC) submitted a Consultation response to the Local Planning Authority setting out, amongst other concerns, their serious concerns regarding highway access arrangements proposed by the Applicant.

The Applicant has responded to the Consultation by F&SPC including a submission by its transport planning consultant that purports to allay and/or adequately dismiss the Parish Council's fears over traffic safety and loss of amenity for existing residents in Fradley South. This response, in the form of a Technical Note by Mode Transport Planning dated 17 November, failed to answer the most crucial aspect of the Parish Council's concerns, namely the following:

The Applicant's proposals to access an additional 115 dwellings off Horner Avenue without providing appropriate mitigation/improvement would represent a substantial failure to comply with Staffordshire County Council's design standards.

Staffordshire County Council has itself responded to the Applicant requesting more information before it can properly comment and F&SPC would also request this same information.

Whilst awaiting this additional information, the Parish Council has again taken specialist highway and transportation advice regarding the response by the Applicant's consultants, and the following report sets out how the Parish Council and its advisors reject the Applicant's response pending further information regarding how it proposes to improve the highway access proposals to comply with the Local Highway Authority's design standards.

Report

Staffordshire County Council (SCC) 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 potentially unsafe and is likely to have issues that 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.

In general, we would agree that the request for information/changes required by SCC are accurate and valid. However, we would like to comment specifically on a number of the areas where we feel that SCC's statement does not, in some cases, extend far enough to enable compliance with their standards.

The following is a list of the SCC points (*in italics*) which we feel either need to be expanded or are incorrect:

2. ***Ideally the internal spine road should be a minimum of 5.5m. 5m as proposed would be acceptable subject to receipt of a plan demonstrating the swept path analysis of a refuse vehicle (at least 11.6m in length, ideally 11.9m in length to future proof the road layout).***

We agree with the first part of the above comment by SCC, but not the term "ideally". The SCC Design Guide specifies a Road Hierarchy where each road category is based upon the number of dwellings served from that carriageway. To support more than 100 dwellings off a single Cul-de-Sac the road must be one of the following:

- Connector Road (6m wide) 100-300 dwellings
- Major Residential Access Road (5.5m wide) up to 300 dwellings.
- Minor Access Road (5.0m wide) which can support up to 100 houses (Cul-de-Sac) or 200 houses with a loop / connector road with two accesses.

Currently Horner Avenue has two parts. The first section up to the tee-junction is classified as a Minor Access Road (5.0m wide and supporting all 36 dwellings) it then branches both east (13 dwellings) and west (17 dwellings) into two Minor Access Ways (capable of supporting 25 dwellings each) and has only 1 footway.

To conform to the SCC standards and support the existing 36 dwellings plus proposed 115 dwellings giving 151 total, which is an excess of 125 houses on the eastern Minor Access Way and an excess of 51 on the Minor Access Road, the route from Worthington Road must ALL be to the standard of a Major Residential Access. 5.5m wide with 2 x 2.0m footways. This is a considerable excess and should in our view mean that the upgrades needed to meet SCC's Design Guide should be mandatory.

This would mean widening the Horner Avenue carriageway by 0.5m, removing the junction at the top of the road and replacing it with a bend (min centreline radii 15m), which would include a forward visibility splay which may remove part of the garden of No. 5 and a 15m second bend would replace the turning head.

If SCC are classing the proposed emergency access to Ward Close as the secondary access. They are assuming that the standards of a Minor Access Road apply (5.0m wide 2 x 2.0m footway - up to 200 houses off a loop / connector street). We believe that this is incorrect, an emergency access cannot be considered the same as a loop or connector road.

Secondly, if the Minor Access Road specification were to be applied, further modification to the existing Horner Avenue carriageway would still need to be undertaken. The 'table-top' junction at the top of Horner Ave would need to be replaced with a 15m centreline radius bend as would the turning head, but these would both have forward visibility issues. Also, a second footway be required where it is currently verge. All three of these mitigation items have not currently been proposed.

Therefore, whether SCC believe the proposal to be a Major Residential Access or a Minor Access Road the application is flawed, as there are no changes the Horner Avenue to make it comply with current standards and therefore cope with the increased traffic flow, and as such should be challenged.

3. ***It is not clear what priority vehicles have when entering the site from Horner Avenue, please confirm whether this would be a priority or free-flowing junctions and provide the relevant visibility splays/ forward visibility.***

This supports our previous statement that the route from Worthington Road should be a consistent width, with the tee junctions replaced with bends, as this would eliminate any doubt and therefore increase safety.

7. ***The appropriateness of the existing block paved raised table on Horner Avenue should be reviewed to ensure it is suitable to accommodate the additional vehicular trips associated with the proposed development.***

As previous stated, this should be replaced with a bend and the table removed to comply with SCC standards. Currently it is parked upon and is beginning to show signs of distress. We believe SCC's comment is valid but should be taken further to demand the table be replaced by a bend. Due to the existing land ownership (No 5) and size of the required visibility splay this may not be possible and as such should cause SCC to reject the use of Horner Avenue as an access.

16. ***A Stage 1 Road Safety Audit would be suggested at this stage to check that the proposed site access arrangements are, in principle acceptable from a highway safety perspective.***

We understand that a stage 1 RSA may have been undertaken, although we have not had sight of the document and it is not available for download on the Planning Portal, Mode Transport suggest that "minor issues" were raised regarding the site layout and provides recommendations for consideration. No details have been given. We would have anticipated that at this stage an RSA1 may highlight the aspects of Horner Ave we have noted with regard to the need for bends, the current parking problem, and lack of footway.

24. ***An on-street car parking audit for Horner Avenue should be provided to understand the existing on-street parking demand and whether this would pose a hazard in terms of the additional traffic generated by the development.***

We strongly agree with this comment by SCC, and such an audit would highlight the issue currently faced on Horner Ave and how it would likely get worse, this could also be provided to the Road Safety Audit team as background information.

Mode Transport Planning Technical Note

2. ***Highways Impact at Turnbull Road – point 17 of F&SPC letter.***

Mode TP comments on the impact of the Dementia unit on the Common Lane / Turnbull Road roundabout. The table they include demonstrates that the inclusion of the unit will have negligible impact on the roundabout.

Traffic flows are based on 2024 base + committed + the proposed development. However, it is not made clear which committed schemes have been allocated; when the base flows were taken; how the traffic flows were generated (TRICS would be the normal method) and the calculations to growth the figures to 2024. These questions require further evidence from Mode TP.

If the answers to these questions are satisfactory and the evidence provided proves that point 17 has been properly assessed, then there is a de-minimus effect on the roundabout.

3/4. Rogerson Road/Off site Parking/Emergency Access– point 18 & 19 of FSPC letter.

The statement made by F&SPC was, that due to the current parking on Rogerson Road it could restrict access for emergency vehicles. Following a discussion between F&SPC and SCC regarding this, SCC suggested the solution to this would be to provide double yellow lines and additional parking.

In section 3 Mode TP has not addressed this fully, but state that the original road is designed to approved standards and no amendments are proposed.

If Ward Close and Rogerson Road are to be used as an emergency access, as proposed, then a fully considered response to the Parish and Highway Authority's desire for yellow lines (traffic regulation order) and additional parking needs to be considered to prevent an emergency vehicle being able to negotiate the road.

In Section 4 Mode TP state that the quantum of parking on the site conforms to the LDC SSPD (2019) and as such vehicles from the site would not park on the surrounding roads. The LDC SSPD is based upon a desire to suppress car use in favour of sustainable ideals, which inevitably results in the off-road parking not satisfying demand. Therefore, the Parish Council has a valid concern regarding parking problems that may arise should this development be allowed.

In section 4. Mode TP also states that there will be no construction traffic using Ward Close or Rogerson Road, but they did not mention Horner Avenue, suggesting that this may be the chosen Construction traffic route.

5. Construction Access – point 20 of FSPC letter.

Mode TP states that a final construction access route has yet to be agreed. However, they are considering a route directly off Common Lane, which could later be turned into a pedestrian cycle route. This would be an adequate route as it would allow all construction vehicles (particularly HGVs) to access the site without using any local roads. This route has been ruled out by the Parish Council who own the land across which this route would pass, thus there is no adequate route for construction traffic. The omission of Horner Avenue from the list in section 4 may be because Horner Avenue is still being considered and this would be entirely unacceptable for all the reasons set out regarding the limited scale of development the Horner Avenue can sustain.

6 Road Safety Audit

Comments included as part of the SCC comments No16.

7 SCC guidance - point 21 of FSPC letter

Mode TP has not fully answered the 13 points (and the Appendix) raised by the Parish Council, regarding the road hierarchy and need to modify Horner Avenue to conform to the standards.

Instead, they have deflected this concern by stating SCC didn't object to the geometry only requiring some additional tracking. They state following the RSA and the tracking the proposals have been altered. The updated plans have not been included.

As previously reported, SCC's decision regarding the geometry is incorrect and needs to be challenged. For the reasons stated above, the current application does not meet SCC's Design Standards relating house numbers and road hierarchy.

Conclusion

The Applicant's consultant, Mode Transport Planning, did not respond to the primary objection set out in F&SPC's previous Consultation; namely that the proposed highway access route via Horner Avenue is not capable of supporting the substantial increase in number of dwellings without modification in accordance with the Highway Authority's design standards for carriageway widths, alignment, forward visibility and footway provision and would result in an unsafe situation for existing and new occupiers.

Therefore, the Parish Council should maintain its Objection because the Applicant has failed to respond to your earlier Consultation and provide an alternative solution to the currently substandard highway access arrangements set out in their Application.

22nd January 2021