

Robert Wordsworth
Planning Inspectorate

Date: 5 November 2021
Our Ref: 2018-449
Your Ref:
Reply Paul Lacey
To:
By Email Only

Dear Sir

RE: Response to report by Moss Naylor Young

Moss Naylor Young have been appointed by Care4Cary to consider the safety issues related to the new access to a proposed residential development on the north side of the A371 Ansford Hill. A recent automatic traffic count has been undertaken together with speed measurements at the site of the proposed access over a two week period in September 2021. A report was prepared by MNY and this letter responds to the points raised.

The various points are set out below with LvW responses to each point.

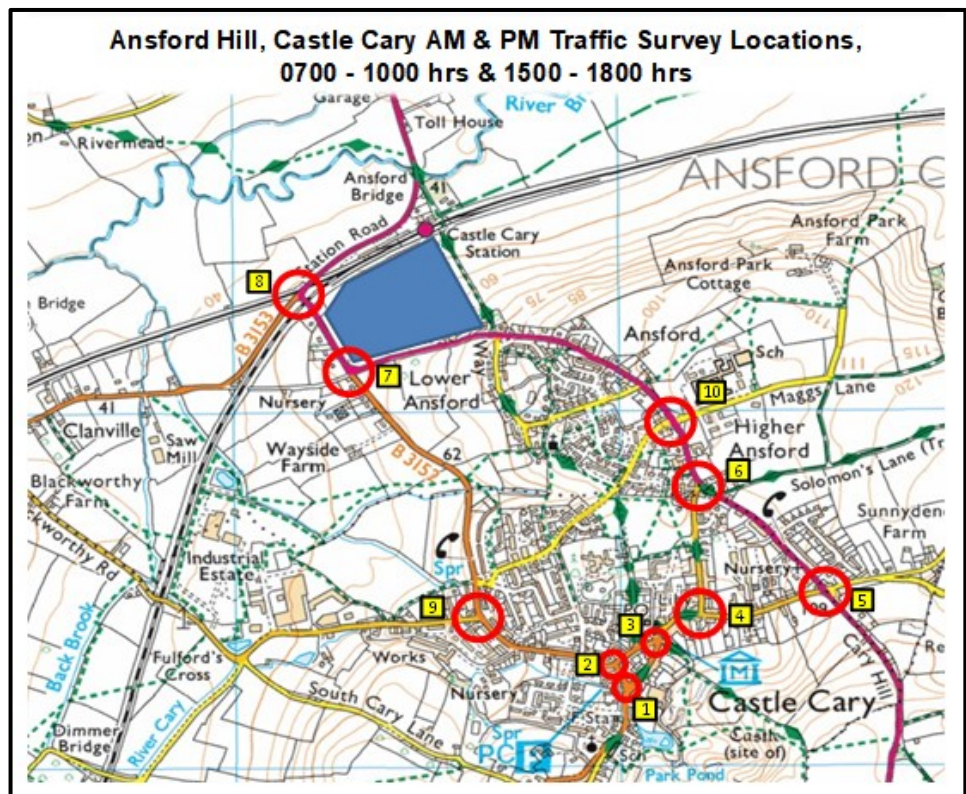
MNY Comment

No traffic analysis of the A371 has been included in the Applicant's submission

LvW Response

The submitted Transport Assessment included data from numerous am and pm peak traffic counts as shown in the diagram. This included five junctions along the A371. The peak hour counts in the latest ATC data compares favourably with the surveys undertaken in 2019.

Capacity tests of the site access show maximum queue lengths from the site and in the right turn lane of no more than one vehicle. In total capacity tests were undertaken at four A371 junctions.



MNY Comment

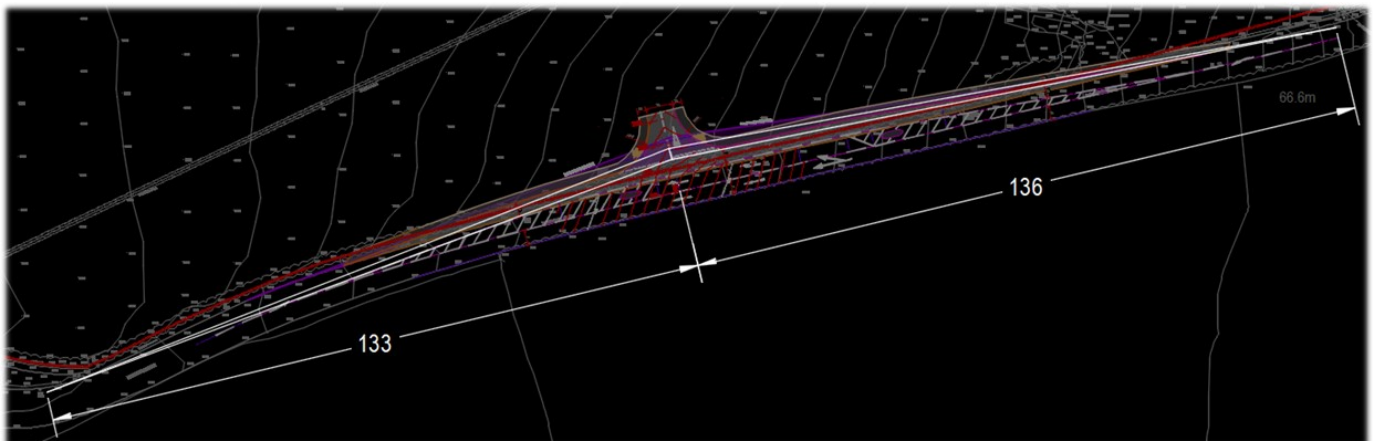
Traffic speeds on the Ansford Hill section of the A371, where the vehicle access to the proposed site is planned, are significantly and persistently in excess of the 30mph speed limit. The volumes, speeds and vehicle mix are consistent through the day and the presence of speeding HGVs causes particular concern.

The observed speeds were shown in the following table.

	<u>85%ile</u>	<u>Mean</u>
Eastbound:	39.2mph	33.9mph
Westbound:	40.5mph	35.0mph

LvW Response

Although speed measurements were not taken as part of the Transport Assessment numerous site visits by both LvW Highways and JRC Consultants (responsible for the highway design) confirmed that speeds were often in excess of the 30mph speed limit. As a result of the site visits the design of the access was based on a design speed of 60kph (37.3mph) where a visibility splay of 90 metres is required based on the Design Manual for Roads and Bridges (DMRB) standards. The submitted 'Site Access Layout' indicates the 90m visibility splays at a point 4.5m back from the give way line. With the speeds shown in the table above it could be argued that a design speed of 70kph would be appropriate where a visibility of 120m should be provided. JRC Consulting have checked the available visibility and have confirmed that at a point 2.4m back from the give way line 136m is available to the east and 133m to the west. The design therefore conforms to the higher design speed.



Although speeds have been observed at the location of the proposed site access this does not take account of the traffic calming effect of the two central islands that will be constructed either side of the access. With housing constructed relatively close to the road and a new T-junction the character of the road will be changed and should beneficially reduce the speed of passing traffic. A new 2m wide footway will also be constructed along the site frontage which again will change the character from a rural to a more urban character.

MNY Comment

The access is potentially unsafe, with very tight junction geometry proposed which does nothing for pedestrians and cyclists and, due to the high traffic speeds measured on the A371 Ansford Hill, is likely to be hazardous for cars turning in and out of the site.

LvW Response

The design of the access was based on a design speed of 60kph and has been thoroughly checked by the Highway Authority. The geometric character of the access is not “tight” as suggested and is provided with 10m radii, 3m wide lanes either side of the central islands and a 3.5m wide right turn lane. A detailed letter was submitted by SCC Highways dated 3 Oct 2019 and provides comprehensive comments indicating that *“The proposed access shall be constructed generally in accordance with details shown on the submitted plan, drawing number 0720 P2, and shall be available for use before occupation. Once constructed the access shall be maintained thereafter in that condition at all times.”* As the design will be subject to a Section 278 process and will be subject to various Safety Audits it will be possible for the Highway Authority to revise the visibility requirement to 120m if they think this is justified. As I have already mentioned this level of visibility will in any case be achieved as the site frontage is relatively straight. The Highway Authority letter is attached as **Appendix A**.

MNY Comment

Should this proposed development be permitted it is likely to generate demand by pedestrians to cross at three other desirable locations: near the junction with the B3152 Station Road, near the proposed new site vehicle access, and towards the junction of Lower Ansford with Ansford Hill where Monarch’s Way crosses the A371.

Links for pedestrians and cyclists are not well provided, being either lacking or of poor and subminimal design standard. The functionality of these paths (e.g., widths and slack bend radii for cyclists) and overview by windows to give natural supervision and thus give users a greater sense of security is very poor.

LvW Response

The A371 site frontage will be provided with a 2m wide footway which will allow pedestrians to cross the A371 at either the western or eastern extremity of the site.

At the western end a crossing point from the B3152 Station Road will be provided by another developer as stated in the Officer Report as follows:

“There has been discussion about provision of a pedestrian/cycle crossing. However, it has been accepted that this is not required from this particular development as it was a requirement of the Wayside Farm planning application (ref. 14/05623/OUT), which was granted on appeal and is underway.”

At the site access it is suggested by MNY that pedestrians will cross Ansford Hill using the proposed central islands and then walk along the road as no footway is present on the south side. I can see no logical reason why pedestrians would cross the road when a new footway will be available along the site frontage and no footway will be available on the south side of the

road. Pedestrians will either use the new footway and walk to the east or west. To the east pedestrians will cross close to the Monarchs Way footpath and to the west close to Station Road.

MNY provide a description of the walk routes from Monarchs Way into the town which it is accepted do require pedestrians to cross the A371 close to the existing gate to Monarchs Way. As no tactile paving is provided at this crossing point it would be possible for this to be provided at a point just to the east of Monarchs Way connecting to the footway on the south side. This could be undertaken, if considered beneficial by the Highway Authority, during the Section 278 process required for the new site access. At this location visibility in both directions is good and will provide pedestrians with sufficient time to cross in suitable gaps in the traffic.



In conclusion it is considered that full assessment of the A371 junctions (including the site access) was considered within the Transport Assessment to the extent that a PICADY capacity test was undertaken to check whether potential queues could form. The surveys and analysis were based on traffic figures which had been observed before the impact of Covid and the results confirmed that the access junction and other junctions throughout the town would be able to cater for the predicted additional movements

In relation to pedestrian movements improvements will be made to Monarchs Way, comprehensive footways will be provided through the development and a frontage footway will be provided along the A371 site frontage. At the west end crossing improvements will be provided by another developer and at the east end minor improvements could be achieved as shown in the photo above.

The Highway Authority have thoroughly checked the proposed layout and the issues related to pedestrian movement and summarised their views in the letter shown in **Appendix A**. This confirms that subject to proposed planning conditions the HA had no objections to the application.

Yours sincerely



Paul Lacey
Director
For and on behalf of LvW Highways

Appendix A

Highway Authority Comments dated 3 October 2019

Somerset County Council

County Hall, Taunton
Somerset, TA1 4DY



For Roads & Transport Services 0300 123 2224

South Somerset District
Council (East)
Brympton Way
Yeovil
Somerset
BA20 2HT

Please ask for:
Adam Garland

Telephone:
01823 359540

email:
highwaysdevelopmentcontrol@somerset.
gov.uk

my reference:
SSDCe/2019/008162

your reference:
19/01840/OUT

3 October 2019

FAO: Stephen Baimbridge

Dear Mr Baimbridge,

TOWN AND COUNTRY PLANNING ACT 1990

Erection of 200 dwellings (70 affordable and 130 open market) with associated highways, drainage, landscaping and public open space. at Land Os 2629 At, Station Road, Castle Cary

Application Reference: 19/01840/OUT

I refer to the above-mentioned planning application received on 29 July 2019 and after carrying out a site visit on 31st July have the following observations on the highway and transportation aspects of this proposal:-

Following a full audit of the submitted information this Authority is content that there will not be a major impact on the highway infrastructure as a result of this development. Whilst a certain level of vehicular trips will be generated, the Transport Assessment shows the surrounding highway network can accommodate the level of increase.



This site, in proximity to the railway station, and with the provision of comprehensive cycling and pedestrian infrastructure will be attractive to railway commuters who wish to travel to larger settlements further afield and as such the level of vehicular increase will be lower than generally expected from a development of this size.

The following mitigation measures should be provided via a suitable legal agreement (s106 Town and Country Planning Act 1990 citing s278 Highways Act 1980);

- Travel Plan
- New access road with right turn lane generally in accordance with drawing number 0720 P2 although the footways should be no less than 2m in width
- Links to the public footpath to the north east and the station (Please see note below)
- A range of internal cycleway/footway routes providing site permeability
- Improvement of the existing footway along the Ansford Hill frontage to no less than 2m wide
- As appropriate, a suitable formal pedestrian/cyclist crossing point in the South West corner of the site linking to existing infrastructure southwards on B3152 Station Road (Please see note 2 below).

NOTE: Drawing number GMA 121-01 shows a number of new internal cycleway/footway routes highlighted in pink linking with the existing public footpath along the NE boundary of the site which is to be 'upgraded'. The developer will be aware that encouraging cyclists to use public footpaths could be committing a trespass against the land owner. In this regard it is understood that the 'upgrade' to the public footpath will be a conversion to cycleway/footway using powers included in the 1984 Cycletracks Act. Full details of the extent of this conversion, the length, construction, and dimensions would need to be arranged in agreement with this Authority's Highways and Public Rights of Way Officers. The conversion of the route should be confirmed in writing prior to any works commencing on the internal cycling infrastructure

NOTE 2: Provision of this crossing point will require a full safety audit and provision of forward visibility splays especially for and of vehicles approaching from the north west.

If permitted the following items will be agreed during the Reserved Matters application stage;

- Estate roads layout, geometry, construction, drainage, and lighting to adoptable standards
- Parking and turning facilities in full accordance with current policy standards

Highway Safety

An in-house safety audit of the proposal was undertaken; no issues were raised by the Auditors.

Access Road Junction

A priority junction with right turn lane is acceptable in principle but full construction details and dimensions will be agreed with this Authority via the technical approval process of a suitable legal agreement.

Drainage

1. Consent from Somerset County Council as Lead Local Flood Authority will be required where constructing headwalls or alterations to the ordinary watercourse are proposed.
2. The FRA references the provision of an offline attenuation tank as part of the drainage strategy. It is unclear from the Indicative Site Layout Plan the location of the storage facility. The designer will need to consider the location of the tank, in particular its proximity to the prospective highway, so that future maintenance operations undertaken on the adjacent highway do not compromise the structural integrity of the infrastructure.
3. In addition to the above, careful consideration of the access arrangements serving the attenuation feature will be required. Facilities enabling maintenance vehicles to park clear of the highway should be provided.
4. Care will need to be taken when designing the bellmouth junction serving the development so as not to compromise any existing drainage infrastructure or drainage rights currently enjoyed on the A371.
5. In order to prevent surface water runoff discharging across the new bellmouth junction serving the development drainage infrastructure should be provided upstream of the new access.

In the event of permission being granted, I would recommend that the following conditions are imposed:-

- No development shall commence unless a Construction Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority. The works shall be carried out strictly in accordance with the approved plan. The plan shall include:
 - Construction vehicle movements;
 - Construction operation hours;
 - Construction vehicular routes to and from site;
 - Construction delivery hours;
 - Expected number of construction vehicles per day;
 - Car parking for contractors;
 - Specific measures to be adopted to mitigate construction impacts in pursuance of the Environmental Code of Construction Practice;
 - A scheme to encourage the use of Public Transport amongst contractors; and
 - Measures to avoid traffic congestion impacting upon the Strategic Road Network.
 - On-site vehicle wheel washing facilities
- The proposed access shall be constructed generally in accordance with details shown on the submitted plan, drawing number 0720 P2, and shall be available for use before occupation. Once constructed the access shall be maintained thereafter in that condition at all times.
- The gradient of the proposed access shall not be steeper than 1 in 10. Once constructed the access shall thereafter be maintained in that condition at all times.
- Provision shall be made within the site for the disposal of surface water so as to prevent its discharge onto the highway, details of which shall have been submitted to and

approved in writing by the Local Planning Authority. Such provision shall be installed before (trigger point) and thereafter maintained at all times.

- The proposed estate roads, footways, footpaths, tactile paving, cycleways, bus stops/bus lay-bys, verges, junctions, street lighting, sewers, drains, retaining walls, service routes, surface water outfall, vehicle overhang margins, embankments, visibility splays, accesses, carriageway gradients, drive gradients, car, motorcycle and cycle parking, and street furniture shall be constructed and laid out in accordance with details to be approved by the Local Planning Authority in writing before their construction begins. For this purpose, plans and sections, indicating as appropriate, the design, layout, levels, gradients, materials and method of construction shall be submitted to the Local Planning Authority.
- The proposed roads, including footpaths and turning spaces where applicable, shall be constructed in such a manner as to ensure that each dwelling before it is occupied shall be served by a properly consolidated and surfaced footpath and carriageway to at least base course level between the dwelling and existing highway.
- In the interests of sustainable development none of the dwellings hereby permitted shall be occupied until a network of cycleway and footpath connections has been constructed within the development site in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.
- The Development hereby permitted shall not be occupied until parking facilities for the dwellings in full accordance with current policy standards, and properly consolidated and surfaced turning spaces for vehicles have been provided and constructed within the site in accordance with details which shall have been submitted to and approved in writing by the Local Planning Authority. Such parking and turning spaces shall be kept clear of obstruction at all times and shall not be used other than for the parking and turning of vehicles in connection with the development hereby permitted.
- The new development shall not be commenced until a detailed Travel Plan has been submitted to and approved in writing by the Local Planning Authority. No part of the new development shall be occupied prior to implementation of those parts identified in the Approved Travel Plan as capable of being implemented prior to occupation. Those parts of the Approved Travel Plan that are identified therein as capable of implementation after occupation shall be implemented in accordance with the timetable contained therein and shall continue to be implemented as long as any part of the development is occupied.
- There shall be no obstruction to visibility greater than 600 millimetres above adjoining road level in advance of lines drawn 4.5 metres back from the carriageway edge on the centre line of the access and extending to points on the nearside carriageway edge 90 metres either side of the access. In order to accommodate larger vehicles associated with the construction phase of the development such visibility splays shall be fully provided before the development hereby permitted is commenced and shall thereafter be maintained at all times.

Yours faithfully,

Adam Garland

Principal Planning Liaison Officer

Traffic & Transport Development Group
Economic and Community Infrastructure Commissioning
Somerset County Council