

The Hurlstone Partnership

PROPOSED DWELLING AT LANSDOWN WALK, BREAM,
GLOUCESTERSHIRE GL15 6NE

Access Review

March 2021

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PROPOSED DWELLING AT LANSDOWN WALK, BREAM, GLOUCESTERSHIRE GL15 6NE

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Transportation Planning, Highway Design and Environmental Assessment

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1 INTRODUCTION

- 1.1 Pre-application consultation was submitted to Forest of Dean District Council (FoDDC) by Brian Griffin Planning & Countryside Consultants Limited on 5th July 2020 for the proposed development of a single dwelling on Land at Lansdown Walk, Bream GL15 6NE, on behalf of Mrs J Davis, who owns the land.
- 1.2 Planning permission had previously been refused for a dwelling by FoDDC under application reference P0693/19/FUL on 10 May 2020, which was also dismissed at Appeal on 14 April 2020 under reference APP/P1615/W/20/3244241, partly due to concerns regarding highway safety, which was considered in paragraphs 13-23 of the Appeal Decision, which is provided at Appendix A of this report for information.
- 1.3 Following consideration of the pre-application submissions, the Highway Authority confirmed it was not supportive of the proposal due to adverse highway safety impacts, which reflected the conclusion reached by the Inspector when determining the Appeal.
- 1.4 The Hurlstone Partnership Limited was instructed to review the proposed development and specifically the achievable visibility splays at the site access to confirm whether or not satisfactory levels of safety could be achieved in the absence of securing the lateral visibility splays from the proposed access to the near edge of the carriageway in each directions.
- 1.5 The remainder of this report sets out the basis of the appraisal and confirms that the achievable visibility at the site access is acceptable when considered in the context of current national design guidance and policy. This Access Review provides supplementary information to that presented within the pre-application document.

2 BASELINE INFORMATION

- 2.1 Empirical speed survey data confirmed 85th percentile speeds of 15.4 mph westbound and 15.5 mph eastbound between 13:00 on Thursday 06th and 07:00 on Thursday 07th July 2017.
- 2.2 When corrected to the appropriate wet weather speeds, these equate to 12.9 mph and 13 mph respectively, resulting in Stopping Sight Distances (SSDs) of 14.817m to the east and 14.941m to the west based on Manual for Streets (MfS) parameters on a level gradient.
- 2.3 The daily traffic flows observed during the survey varied between 72 movements on Sunday and 157 movements on Tuesday (noting there was not a full day of data available for a Thursday). The peak hour flow was during the survey period was 22 movements between 17:00 – 18:00 on Tuesday (12 westbound / 10 eastbound).

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3 APPRAISAL OF ACCESS

- 3.1 The observed traffic flows and speeds may be considered low when compared with the guidance contained in Circular 02/2006 *"The Quiet Lanes and Home Zones (England) Regulations 2006"*.
- 3.2 Circular 02/2006 considers the characteristics of routes which may be acceptable for designation as Quiet Lanes. The document states at paragraph 4: *"Quiet Lanes are minor rural roads or networks of minor rural roads appropriate for shared use by walkers, cyclists, horse riders and other vehicles."* Paragraph 6 states: *"The Department considers that only minor roads or networks of minor roads which have low flows of motorised vehicles travelling at low speeds and are suitable for shared use by walkers, cyclists, equestrians and motorists are appropriate for designation as Quiet Lanes. They should be rural in character, though they do not necessarily have to be in a rural area."* Paragraph 7 states: *"It is recommended that designated Quiet Lanes should have no more than about 1000 motor vehicles per day. Vehicle speeds should be kept to levels appropriate to the mix of uses expected to take place, usually with the 85th percentile speed below 35mph."*
- 3.3 As is apparent the flows and speeds recorded on Lansdown Way are well within what may be considered low. This supports the use of a reduced 2.0m set-back (X distance) as confirmed at paragraphs 16 and 17 of the Inspector's Appeal Decision.
- 3.4 Paragraph 10.5.8 of Manual for Streets 2 (MfS2) advises: *"A minimum X distance of 2m may be considered in some slow speed situations when flows on the minor arm are low, but using this value will mean that the front of some vehicles will protrude slightly into the running carriageway of the major arm, and many drivers will tend to cautiously nose out into traffic. The ability of drivers and cyclists to see this overhang from a reasonable distance, and to manoeuvre around it without due difficulty, should be considered. This also applies in lightly trafficked rural lanes."*
- 3.5 The 2.0m X distance is also considered acceptable on the trunk road network for Direct Accesses (i.e. those serving a single field or dwelling, as confirmed in paragraphs 3.8 1) and 4.1 of CD 123 Geometric Design of at-grade priority and signal-controlled junctions.
- 3.6 As confirmed in the paragraph 17 of the Appeal Decision, the Highway Authority did not object to the proposal, but required visibility splays extending 15m to the near edge of the carriageway, whereas the submitted plan illustrated visibility splays extending to the centreline of Lansdown Walk to the left (west) and to a point 1m into the carriageway to the right (east) of the proposed access.
- 3.7 Paragraph 18 of the Appeal Decision draws attention to the potential for the 0.8m high wall along the frontage of the adjacent property to be replaced by a taller structure or planting which would restrict the current view available. Notwithstanding the Appellant's suggestion that the wall appears to fall within the adopted public highway based upon the highway boundary plan obtained from the Highway Authority, in the event it did not, the neighbour would require planning permission to erect a structure above 1m tall, as there is a limit for

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features of 1m above carriageway level to be placed adjacent to the highway under Part 2 Class A of the General Permitted Development Order 2015.

- 3.8 Similarly, in terms of the potential for new high planting to be allowed to grow to obscure the visibility splay, Section 141 subsection 1 of the Highways Act 1980 confirms: "...no tree or shrub shall be planted in a made-up carriageway, or within 15 feet from the centre of a made-up carriageway". Subsection 2 continues: "If a tree or shrub is planted in contravention of this section the highway authority for the highway or, in the case of a highway maintainable by reason of tenure, enclosure or prescription, the person liable to maintain the highway, may by notice given either to the owner or to the occupier of the land in which the tree or shrub is planted require him to remove it within 21 days from the date of service of the notice."
- 3.9 Given the distance between the façade of the neighbouring dwelling and the centreline of Lansdown Walk is approximately 3.9m (12 feet 9 ½ inches), any vegetation planted or allowed to grow within that area that may be deemed an obstruction could be controlled via S141 and should therefore not be considered a constraint.
- 3.10 Notwithstanding this, any vegetation which may affect the visibility of drivers may also be controlled under S154 of the Highways Act 1980, which states at subsection 1: "Where a hedge, tree or shrub overhangs a highway or any other road or footpath to which the public has access so as to endanger or obstruct the passage of vehicles or pedestrians, or obstructs or interferes with the view of drivers of vehicles or the light from a public lamp, or overhangs a highway so as to endanger or obstruct the passage of horse-riders, a competent authority may, by notice either to the owner of the hedge, tree or shrub or to the occupier of the land on which it is growing, require him within 14 days from the date of service of the notice so to lop or cut it as to remove the cause of the danger, obstruction or interference." (Our emphasis added).
- 3.11 It is therefore apparent that the Inspector should not have been concerned that the existing visibility across the wall, which was measured on site to fall between 0.8m – 1m high, could be further reduced due to the neighbours actions, even if the wall is ultimately considered to fall beyond the highway boundary, contrary to the adopted highway boundary records of the Highway Authority.
- 3.12 As it exists, its height could not lawfully be increased to a level which would obstruct the minimum driver's eye height of 1.05m without first obtaining planning permission. Similarly, any vegetation planted or permitted to grow between the wall and the property façade may be controlled by the Highway Authority through its existing powers.
- 3.13 In terms of the acceptability of achieving the visibility splay to a point between 0.5m and 1m into the carriageway from the near edge, the Inspector advised at paragraph 19 "Due to the narrowness of Lansdown Walk I accept that most vehicles would be quite central in their road position, but there is insufficient detail of how a distance of between 0.5m and 1m out from the verge has been decided in this particular circumstance." Paragraph 21 added: "Further to this, if the figure of 1m outset from the verge is used, although this would account for most wider vehicles, such as cars and vans, there is also the safety of cyclists, for

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example, who may not be positioned so centrally in the road and therefore may not be so apparent in the vision splay as proposed."

- 3.14 The 1m distance is recognised as an alternative point to which visibility may be measured and was used by the engineers reviewing the relationship between restricted visibility and collision risk, as reported in section 10.4 of MfS2.
- 3.15 Paragraph 10.4.2 of MfS2 advises: *"It has often been assumed that a failure to provide visibility at priority junctions in accordance with the values recommended in MfS1 or DMRB (as appropriate) will result in an increased risk of injury collisions. Research carried out by TMS Consultancy for MfS2⁶⁶ has found no evidence of this (see research summary below). Research into cycle safety at T junctions found that higher cycle collision rates are associated with greater visibility⁵⁵."*
- 3.16 Within the summary below paragraph 10.4.2, under the sub-heading 'Site Visits' on page 076 of MfS2 it states: *"Visibility was measured from a height of 1.05m, to a point at the kerb edge and a second point 1m out from the kerb edge, where observations showed that visibility increased."*
- 3.17 Under the sub-heading 'Conclusions' within the summary it states: *"This study has been unable to demonstrate that road safety concerns regarding reduced Y distance are directly associated with increased collision risk at "high risk" urban sites....Previous research for MfS1 demonstrated that main road visibility is influenced by road width and forward visibility. Many of the locations in this study were straight roads with good forward visibility. The ability of the driver to stop is likely to be affected by more than just what is happening in the side road and an understanding of the factors influencing main road speed is important when assessing visibility requirements."*
- 3.18 It is therefore apparent that TMS Consultancy, when undertaking its review, considered a distance 1m out from the kerb line into the carriageway to be an acceptable alternative point to which visibility may be measured. In practical terms, this is considered to be sensible.
- 3.19 Paragraph 10.5.3 of MfS2 advises that in terms of the Y distance: *"...For simplicity it has previously been measured along the nearside kerb line of the main arm, although vehicles will normally be travelling at a distance from the kerb line..."*
- 3.20 When allowing for the fact that vehicles or cyclists would be travelling at a distance from the kerb line, and taking into account their inherent width, the potential for not being able to see at least part of a motorcycle or cyclist at the 1m point is extremely limited. Insofar as cyclists are concerned, due to the significant 5.35 degree / 9.4% gradient at the centreline of the site access and steeper 6.7 degree / 11.7% gradient on its approach from the east, the speed of cyclists would be naturally constrained to a level below the 85th percentiles recorded during the speed survey.

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- 3.21 Paragraph 7.5.9 of MfS1 confirms: *"Gradients affect stopping distances. The deceleration rate of 0.45g used to calculate the figures in Table 7.1 is for a level road. A 10% gradient will increase (or decrease) the rate by around 0.1g."*
- 3.22 Paragraph 10.1.4 of MfS2 confirms: *"Stopping Sight Distance (SSD) is the distance drivers need to be able to see ahead and they can stop within from a given speed. It is calculated from the speed of the vehicle, the time taken for a driver to identify a hazard and then begin to brake (the perception-reaction time), and the vehicle's rate of deceleration. For new streets, the design speed for the location under consideration is set by the designer. For existing streets, the 85th percentile wet-weather speed is used."*
- 3.23 By considering the observed speeds and 15m visibility splays identified, it is apparent that no correction has been made to allow for the gradient of the road within the SSD / visibility splay calculation.
- 3.24 As indicated above, the uphill gradient for westbound traffic varies between 9.4% and 11.7%. However, as the lower gradient is close to the access / site frontage, this is the area within which vehicles would be braking and would therefore impact upon the stopping distance. During the perception-reaction time, the vehicle speed would remain constant until the driver reacts, and therefore braking performance within that length would be unaffected, irrespective of the gradient.
- 3.25 Based on the 9.4% uphill gradient and 12.9 mph wet weather 85th percentile speed, the corrected SSD / visibility splay requirement to the east / right of the site access is calculated to be 14.167m. Similarly, based on the 9.4% downhill gradient the corresponding SSD for eastbound traffic from 13 mph to the west / left is calculated to be 15.951m. However, this is an over-estimate of actual SSD because the gradient increases very close to the access, being just 2.5 degrees / 4.4% on the approach over which the majority of the braking would occur. By way of comparison, with a 4.4% gradient the SSD from 13 mph is calculated to be 15.536m.
- 3.26 By reviewing the topographic survey of the site and its surroundings, based on the proposed access position being located centrally along the site frontage to Lansdown Walk, the visibility splay from the 2.0m X distance to the east / right extends 11.9m to the near carriageway edge and reaches 14.167m at a point 0.68m into the carriageway from the near edge. This increases to 15.25m at 1m into the carriageway.
- 3.27 The comparable visibility splay to the west / left from the same access position, extends 23.75m to the near edge if taking the corner of the neighbouring house as the constraint (i.e. assuming the ability to see over the low wall is maintained) and 9.87m if taking the roadside face of the low wall as the constraint. Based on the latter, the 15.961m distance is achieved at a point 1.567m into the carriageway, which is approximately 4.1m wide at that point.
- 3.28 It is therefore apparent that the visibility splay to the right is achieved within the 1m inset distance, and that to the left is significantly exceeded to the near edge when looking over the low wall, which falls within the area of the public highway identified by the Highway

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Authority's plan, and could not in any event be lawfully raised to a level where the sight-line could be obstructed without planning permission. If the wall were raised, the required visibility would still be achieved in front of it on the site side of the carriageway. This effectively means that unless a vehicle was travelling on the wrong side of the road, or overtaking, which is unlikely given the limited carriageway width available, the oncoming vehicle would be in clear view.

- 3.29 The potential for vehicles to be on the wrong side of the carriageway on the approach to the site frontage is also limited due to the on-street parking associated with the neighbouring property, which straddles the verge and nearside road edge, thus reducing the available carriageway width, as illustrated in the photograph below:



- 3.30 During the site visit, visibility splays were checked using traffic cones, poles and a road wheel. With the car parked as illustrated above, the visibility was measured taking the corner of the house and the low wall as the alternative constraints. From the 2m X distance a distance of 23m was achieved with the car forming the constraint when looking over the low wall, whilst a distance of around 11.25m was measured when using the low wall as the control point to the near edge. The comparable distances to the right (east) were 12.6m to the near edge, 14.95m to $\frac{1}{4}$ width, 17.3m to the centreline and 21.8m to the far edge of Lansdown Walk. The previously specified 15m distance was achieved 0.7m into the carriageway.
- 3.33 The comparable distances were also measured at the 2.4m X distance for completeness. To the left / west a distance of 10.75m to the near edge was established using the low wall as the constraint, which increased to 23m to the car when looking above the low wall.

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- 3.34 The visibility to the right / east extended 12.3m to the near edge, 14.1m to the $\frac{1}{4}$ distance, 16m to the centreline and 19.8m to the far edge of the Lansdown Walk, which was between 2.75m and 3m wide to the east. From the 2.4m X distance, the 15m Y distance was achieved 1m into the carriageway from the near edge.
- 3.35 Forward visibility towards a vehicle emerging from the site access was also measured on site. From the east, the distance extended between 21.5m at the near edge and 38.5m from the far edge of the carriageway. At the $\frac{1}{4}$ distance across the surface (i.e. the centreline of what would be the nearside / oncoming traffic lane if the road were wide enough to accommodate 2 traffic lanes but only approximately 0.7m into the carriageway in this case) the forward visibility splay extends approximately 26.7m; increasing to 31.5m at the centreline of the single-track route.
- 3.36 The forward visibility splay from the west towards the access extended some 82m, as it was possible to see the access when turning into Lansdown Walk from Brockhollands Way. from the junction, as illustrated in the photograph below, within which the traffic cone at the access is annotated.



- 3.37 However, with the parked car in place, the view was not clear over the full distance. At the near edge, it was possible to see 25.5m. Beyond that point until 62.5m from the access centreline, the car obstructed the visibility along the near edge of Lansdown Walk. Then, between 62.5m and the junction at 82m distant, the access was in view.
- 3.38 When measured along the centreline of Lansdown Walk, the forward visibility was 36.4m before the car obscured the view until reaching 53.6m, beyond which the clear view was maintained to 78.6m. At the $\frac{3}{4}$ distance across the carriageway (i.e. centreline of the oncoming traffic lane) the view was clear to 62m, which reduced to 53m at the far side of

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Lansdown Walk. The reason the view reduced across the width of the route is due to the slight left-hand bend and vehicle parked on the left in the photograph above and below.



- 3.39 As is apparent from the foregoing, the forward visibility for drivers and other road users approaching the access is good from both directions, and significantly above the required SSDs required for the observed traffic speeds.
- 3.40 As the SSD is based upon the main-line traffic speed and the ability of the oncoming driver to see the hazard ahead (e.g. an emerging vehicle at the access) then slow down and stop to avoid a collision if, for example an emerging vehicle stalled whilst attempting to join the main road, the forward visibility is arguably more important than the lateral visibility when assessing highway safety at accesses and junctions.
- 3.41 As was found by the research reported in section 10.4 of MfS2, highlighted previously, there was no evidence linking reduced Y distances at junctions with increased collision risk, at sites where forward visibility is good. This is not surprising, as there are few drivers who are intent on having a collision; and any reasonable driver would slow down and stop if necessary, in order to avoid an accident occurring. Provided they can identify the hazard in good time to do so, safety should not be unacceptable compromised because drivers emerging must carefully edge out in order to achieve a better view along the priority route.
- 3.42 This principle of driver behaviour is recognised at Page 80 of MfS2, which considers obstacles to visibility. Paragraph 10.7.1 states: *"Parking in visibility splays in built-up areas is quite common, yet it does not appear to create significant problems in practice. Ideally, defined parking bays should be provided outside the visibility splay. However, in some circumstances, where speeds are low, some encroachment may be acceptable (See Example below)".*

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- 3.43 The text accompanying the Example referred to advises: *"At urban junctions where visibility is limited by buildings and parked cars, drivers of vehicles on the minor arm tend to nose out carefully until they can see oncoming traffic and vice-versa.*
- In the images above, the blue car moves forward slowly until it can see past the parked vehicles to see that the gap to the next oncoming vehicle is long enough for it to pull out. Drivers on the major route will also be able to see the vehicle pulling forward slowly and may slow down or stop to allow it to pull out".*
- 3.44 As reported in MfS2 at paragraph 3.1.8, the Highway Code provides advice to drivers to *"take the road and traffic conditions into account. Be prepared for unexpected or difficult situations, for example, the road being blocked beyond a blind bend. Be prepared to adjust your speed as a precaution...where there are junctions, be prepared for road users emerging."* Paragraph 3.1.10 of MfS2 advises that drivers are responsible for their own safety and cites a ruling *"The overriding imperative is that those who drive on the public highway do so in a manner and at speed which is safe having regard to such matters as the nature of the road, the weather conditions and the traffic conditions. Drivers are first and foremost responsible for the own safety."*
- 3.45 It is for these reasons that paragraph 10.5.9 of MfS2 advises: *"The Y distance should be based on the recommended SSD values. However, based on the research referred to above, unless there is local evidence to the contrary, a reduction in visibility below recommended values will not necessarily lead to a significant problem."* (Our emphasis).
- 3.46 This evidence-based approach is reiterated in an article contained in the November 2010 edition of Transportation Professional, the magazine of the Chartered Institution of Highways and Transportation. The Cover Story article *"Manual for Streets 2"* quotes Alan Young, the principal author of MfS1 and MfS2: *"The advice is to look at speed first, then detailed assessment of local context and vehicle and pedestrian collision records. If there is a problem of safety, deal with it as appropriate; if collision records are acceptable, avoid rigorous following of standards and focus on the quality of the place,"* says Mr. Young." The article concludes with a further quotation *"This research combined with what's been recognised before suggests greater visibility could be increasing hazards, but the important message is do not get hung up on standards. Be flexible and make decisions based on evidence."*
- 3.47 The nature of the place is key to the appraisal, as MfS and MfS2 refer to local context. MfS2 is critical of the approach of some practitioners at paragraph 3.2.1 which states: *"For some time there have been concerns expressed over designers slavishly adhering to guidance regardless of local context."* The document goes on to state in the following paragraphs *"Designers are expected to use their professional judgement when designing schemes and should not be over-reliant on guidance....Available guidance is just that, guidance, and cannot be expected to cover the precise conditions and circumstances applying at the site under examination....The authors of guidance, how ever accomplished, will not be cognizant of the site and situation in question. It would be neither reasonable nor rational to presume that anyone could produce an optimal design in abstract. The informed judgement of trained professionals on-site, should logically take precedence over guidance"*.

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- 3.48 In this case, the local context is one where many of the local accesses and junctions onto Lansdown Walk do not meet desirable standards in terms of their visibility provision. Notwithstanding this, a review of Crashmap data confirms that there have been no recorded personal injury accidents on Lansdown Walk for the 21-year period between 1999 and 2019 inclusive covered by the database.
- 3.49 This performance provides compelling evidence that the local road users are able to accommodate the routine movements to/from the highway by vehicles accessing the dwellings distributed along its length; many of which require occupants and visitors to reverse to or from the highway due to the lack of space to turn within the sites to enable drivers enter and leave in a forward gear.
- 3.50 By contrast, the proposed development provides turning space for vehicles. The access arrangement also provides sufficient lateral visibility from the desirable 2.4m X distance to allow the emerging driver to see for the majority of the required visibility splay length in both directions before edging out to obtain a better view, as is recognised to occur in MfS2.
- 3.51 Based on the 2.4m x 12.6m to the near edge to the right, when taking into account the uphill gradient, this provides for an approach speed of 11.5 mph for cyclists, even if they are cycling with their tyres on the very edge of the road, which is highly unlikely. However, even in that road position at least half of the bicycle / cyclist's width would be visible as it projects across the carriageway surface, as would any larger vehicle running along the road edge.
- 3.52 Given the desirable distance based on the 85th percentile speed for all vehicles is achieved within 0.68m of the near edge as the emerging driver edges forward, or leans forward towards / over the steering wheel to increase their view, when allowing for a slight inset to the road from its near edge, it is highly unlikely that any vehicle approaching the access would not be at least partially visible.
- 3.53 Noting that the visibility at the proposed access would be comparably superior to many of its neighbouring accesses and junctions, which evidently demonstrate they perform safely, there is no reason to believe that highway safety would be unacceptably compromised as a result of the proposed development.

4 POLICY CONSIDERATIONS

- 4.1 The National Planning Policy Framework (The Framework) imposes the following tests in terms of transport matters. Under the heading '*Considering development proposals*', paragraph 108 of The Framework states:

"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*

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- b) *safe and suitable access to the site can be achieved for all users; and*
- c) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*

4.2 Paragraph 109 continues: *"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."*

4.3 A severe impact is a high threshold to breach. In circumstances where the site access would deliver comparably superior visibility to its neighbours, which in turn have performed safely for 21 years for good reasons that can be explained with reference to relevant guidance advocating a flexible, evidence-based approach, it would be difficult to conclude that the proposal would result in an unacceptable impact on highway safety or a severe residual cumulative impact on the road network.

4.4 Having considered the foregoing, as there would be no unacceptable impact on highway safety or a severe residual cumulative impact on the road network, when assessed in the context of paragraphs 108 and 109 of the National Planning Policy Framework, it can only be reasonably concluded the development should not be prevented or refused on highway grounds.

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5 SUMMARY

- 5.1 Following the refusal of planning permission P603/19/FUL and dismissal of Appeal APP/P1615/W/20/3244241 for a single dwelling on the site at Lansdown Road, Bream, Gloucestershire GL15 6NE, a pre-application consultation submission was made to the Planning Authority which provided further information to address the previous reasons for refusal of planning permission.
- 5.2 Notwithstanding the additional information provided, the Council retained concerns regarding highway safety due to the inability to achieve desirable lateral visibility splays to the near edge of the carriageway.
- 5.3 The Hurlstone Partnership Limited was instructed to review the recent planning history, empirical survey data and the adequacy of the proposed and achievable visibility splays at the site access.
- 5.4 Having completed the review, it is apparent that the Inspector's concerns regarding the position on the carriageway to which the desirable splays could be achieved may be addressed with reference to current highway design guidance, which specifically references measurements taken at an alternative position 1m in from the road edge when assessing visibility and safety.
- 5.5 Similarly, the Inspector's concerns regarding the potential for visibility splays to be obstructed by structures and / or vegetation may also be addressed with reference to powers bestowed upon the Highway Authority under the Highways Act 1980 and the constraints imposed by Part 2 Class A of the General Permitted Development Order 2015.
- 5.6 The review undertaken has found that in circumstances where the site access would deliver comparably superior visibility to its neighbours, which in turn have performed safely for 21 years for good reasons that can be explained with reference to relevant guidance advocating a flexible, evidence-based approach, it would be difficult to conclude that the proposal would result in an unacceptable impact on highway safety or a severe residual cumulative impact on the road network.
- 5.7 In these circumstances, when taking into account the highway tests imposed by the National Planning Policy Framework, it can only be reasonably concluded the development should not be prevented or refused on highway grounds.