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TOWN CLERK

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Our ref: P/Gladmans/P190111/O

4th May 2021

Charlotte Atkins
Principal Planning Officer
Herefordshire Council
Via email: Charlotte.Atkins@herefordshire.gov.uk

Dear Ms Atkins,

RE: P190111/O - Outline planning application for the erection of up to 120 dwellings with public open space, landscaping and sustainable drainage system (SuDS) and vehicular access point from the A44. All matters reserved except for means of access for Gladman Developments Ltd.

Thank you for agreeing to an extension to the time allowed for the Town Council to submit comments in respect of the above planning application.

As you are aware, the Town Council commissioned Mr John Lloyd of Flow Consult Limited to carry out an independent review of development proposals relating to highways and transport matters for this application.

Mr Lloyd presented his report to the Town Council's Planning & Economic Development Committee at a meeting held on 29th April 2021. At that meeting, Members unanimously agreed with the report's independent findings and resolved that it be submitted to the Herefordshire Planning Authority with the additional comment:

"The Town Council does not believe that any of these matters can be deferred to the detailed application stage because an outline consent, with all matters reserved except for access, must show that the access is deliverable now, in order that the development is deliverable in the future".

Please do not hesitate to contact me if you have any queries on this matter.

Yours sincerely,

Karen Mitchell
Town Clerk

Highways Technical Note

Introduction

- 1.1 Flow Consult Limited (FCL) has been commissioned by Bromyard and Winslow Town Council to review development proposals, in respect of highway and transport matters, for up to 120 residential dwellings within land located adjacent to Pencombe Lane in Bromyard, Herefordshire.
- 1.2 FCL visited the immediate surrounding highway network to the proposed development site on Tuesday 13th April 2021.

Development Proposals

- 1.3 An outline planning application has been submitted by Gladman Developments Limited for up to 120 residential dwellings (planning reference number: P190111/O). All matters are reserved except access.
- 1.4 Vehicle access is proposed along the A44 in the form of a three-arm signal-controlled junction. It is proposed that a fourth arm be added to the junction to serve residential development located to the north of the A44.
- 1.5 It is proposed that pedestrian facilities be incorporated within the signal-controlled access junction and a footway link be provided and improved along the northern side of the A44 between the proposed access junction and the junction with Panniers Lane.
- 1.6 Pedestrian access is also proposed along B4214 Panniers Lane immediately to the north of the simple-priority-controlled-junction of Panniers Lane with Pencombe Lane. It is proposed that a footway link be provided along the western side of Panniers Lane.

Outline of Issues

- 1.7 During the site visit and as part of a desktop-based assessment a number of issues, mostly highway safety related, have been observed and considered. The following provides a brief overview of three areas of issues identified prior to being assessed in greater detail:
 - ♦ **Issue 1:** Appropriateness of footway link along the A44 in consideration of highway conditions and character and associated highway safety issues. Also, the deliverability of an appropriate footway link and necessary improvements to adequately mitigate the issues.

- ♦ **Issue 2:** Deliverability of a sufficient footway link along Panniers Lane;
- ♦ **Issue 3:** General accessibility of the site in consideration of highway conditions, safety and local topography.

1.8 Drawing FCL0041-01, included as Appendix A, identifies the approximate locations of the issues raised.

Issue 1

- 1.9 The A44 is a strategic route which travels between Chipping Norton to Aberystwyth. The road is heavily trafficked and with a high proportion of heavy goods vehicles (HGVs). Agricultural vehicles also use the road.
- 1.10 Photograph 1 presents a view of a section of the A44 between the proposed site access junction and the junction with Panniers Lane (facing the west at the junction of A44 / Winslow Road).



Photograph 1

- 1.11 Photograph 2 presents a further photograph of the section of A44 between the proposed site access junction and the junction with Panniers Lane (facing west at the signal-controlled crossing).



Photograph 2

- 1.12 The section of A44 adjacent to the site, and from which vehicle and pedestrian access to the proposed development will be taken, is relatively narrow and whilst the traffic flow is reflective of a strategic road, the geometric parameters are not.
- 1.13 Due to the level and speed of traffic, the measurement of carriageway width along the A44 was not possible for any significant section. However, sample measurements were taken along the A44 between the proposed vehicle access junction and the junction of the A44 with Panniers Lane. There were two sections, as indicated by Appendix A, where the width of the carriageway was measured at below 6m.
- 1.14 Photograph 3 presents a view of tyre marks along the verge immediately to the west of the signal-controlled crossing. It is evident that overrunning occurs and is due to the limited carriageway width.



Photograph 3

- 1.15 Sections of existing footway along the northern side of the carriageway between the proposed access junction and Panniers Lane were measured at between 1m and 1.5m in width. Whilst it is apparent that certain sections can be widened within the extent of apparent highway boundary, constraints will limit this in places and a maximum of 1.5m width will likely be achieved.
- 1.16 Photograph 4 presents an example of a section of footway along the A44 (in advance of the junction with Panniers Lane) where a maximum width of 1.5m will likely be achieved.



Photograph 4

- 1.17 As previously identified, the A44 is a strategic route that travels between settlements. As traffic flow and the size of vehicles has increased, constraints presented within settlements through which a strategic route travels often prevent upgrade. Where highway issues are significant, and where feasible, bypasses have often been constructed.
- 1.18 The proposed development site is located adjacent to the western edge of Bromyard and would extend the extent of settlement through which the A44 travels.
- 1.19 The following presents applicable geometric design standards that would need to be achieved for a road similar in character and purpose to the section of A44 that travels through Bromyard, but should also be considered in respect of the facilitation of significant new development:

Herefordshire Council Highways Design Guide for New Developments

- 1.20 Within the highway hierarchy outlined on page 4 of the Design Guide, a strategic route is described as a principal A road between primary destination. Furthermore, that the routes are for fast moving long distance traffic with little frontage access or pedestrian traffic. Speed limits are usually in excess of 40mph and there are few junctions. Pedestrian crossings are either segregated or controlled and parked vehicles are generally prohibited.

- 1.21 A main distributor is described as a major urban network and inter-primary links. The routes are for short to medium distance traffic and the roads are classified A or B.
- 1.22 Whilst the A44 is a strategic route, the section through the settlement of Bromyard also serves as a main distributor.
- 1.23 The Design Guide does not present geometric design standards in respect of highway that is more strategic than a local distributor road as national standards, as outlined within the Design Manual for Roads and Bridges (DMRB), is relied upon.
- 1.24 To provide an indication as to the deficiency in respect of geometric parameters along the A44 between the proposed site access junction and the junction with Panniers Way, the following presents the design criteria for a local distributor road, as set out within the Highways Development Design Guide:
- ♦ 7.3m carriageway
 - ♦ 2m footway along one side of the carriageway
 - ♦ 2m outer verges along both sides of the carriageway
 - ♦ 3.5m shared footway and cycleway along one side of the carriageway

Design Manual for Roads and Bridges

- 1.25 CD 109 *Highway link design* and CD127 *Cross-sections and headrooms* stipulate a carriageway width of 7.3m for a 2-lane single carriageway.
- 1.26 CD 143 *Designing for walking, cycling and horse-riding* identifies that dedicated networks and facilities not only improve pedestrian, cyclist and equestrian safety, but also their feeling of how safe the environment is.
- 1.27 CD 143 *England National Application Annex to CD 143 Designing for walking, cycling and horse-riding* identifies a desirable minimum width of 2.6m for a footway and absolute minimum of 2m. Furthermore, it is identified that the separation from the carriageway should be at least 1.5metres or 0.5 metres on roads with speed limits of 40 mph or less.

Manual for Streets

- 1.28 Paragraph 6.3.22 identifies:
- “There is no maximum width for footways. In lightly used streets (such as those with a purely residential function), the minimum unobstructed width for pedestrian should be 2m. Additional width should be considered between the footway and a heavily used carriageway, or adjacent to gathering places, such as schools and shops”.*

- 1.29 It is evident that the geometric parameters of the section of A44 between the proposed site access junction and the junction of the A44 with Panniers Lane falls significantly short of the standards that a new road would need to achieve.
- 1.30 The resultant effect of the deficiency in both carriageway and footway widths is that pedestrians using the route between the proposed site access junction and the junction with Panniers Lane will be uncomfortably close to vehicles travelling along the carriageway. This will particularly be the case with HGVs, which are typically 3m in width (inclusive of wing mirrors). Given that the carriageway is sub 6m in sections, at least the wing mirrors of the HGV will overrun the footway. As previously identified, evidence of vehicles overrunning the highway verge was recorded during the site visit.
- 1.31 In consideration of the increase in pedestrian movements along the A44 associated with the development proposals, it is of paramount importance, due to the relatively narrow carriageway and high proportion of HGV traffic, that minimum standards in respect of footway width should be achieved. It is unlikely that the minimum standard can be achieved.
- 1.32 Another highway safety issue was noted along the pedestrian route along the A44. There is relatively large junction radii at the junction of the A44 with Winslow Road. Furthermore, the carriageway along Winslow Road is relatively wide (wider than the A44). Without significant deviation from the pedestrian desire line, the result is a lengthy pedestrian crossing of bell mouth at the junction. The proposed highway improvements do not address this issue or the limited forward visibility around the radii for vehicles turning left from the A44 into Winslow Road.
- 1.33 Within the appeal decision dated 19th May 2016 relating to the previous planning application made by Gladman Developments in 2014, the Inspector makes reference to pedestrian safety along the A44 and in paragraph 57 states *“I found walking along the northern verge of the A44 extremely intimidating and this would be unacceptable for children or the elderly”*.
- 1.34 It is evident that the latest development proposals do not demonstrate sufficient improvement to the pedestrian route along the northern side of the A44 between the site access junction and the junction with Panniers Lane. Due to the character of the A44 and the traffic flow that it needs to accommodate, an insufficient footway width will likely result in a significant highway safety issue. Furthermore, the route will likely be unattractive to potential future residents of the development.

Issue 2

- 1.35 The development access proposals include a second pedestrian access along Panniers Lane. The proposed connection is located immediately to the north of the junction with Pencombe Lane. It is understood that the preferred option for a pedestrian connection along Panniers Lane, to integrate with existing pedestrian facilities at the junction with the A44, comprises a new continuous footway link along the western side of the carriageway. However, it is apparent that the deliverability of the new footway has not been adequately demonstrated and there are several issues that require further consideration, as follows:
- ♦ It is unclear as to whether there is a continuous highway verge due to third party land ownership constraints.
 - ♦ There are sections of limited width between third party land ownership and the edge of carriageway such that the provision of a 2m wide footway is not feasible and potentially even a 1.5m footway.
 - ♦ Significant level difference occurs between third party land ownership and the edge of carriageway. Retaining structures would likely need to be constructed and accommodated within the highway. It is unclear whether this could be accommodated in the extent of land available and achieve the necessary footway width.
 - ♦ There is street furniture and utilities located within the highway verge that has not been considered. The feasibility for moving an overhead power line is of most significance.
 - ♦ Mature trees located within third party land to the western side of the carriageway have not been considered and potential works within the highway verge may be restricted due to the necessary protection of tree roots.
- 1.36 Photographs 5 to 9 provide views of the western side of the carriageway and have been included to demonstrate the issues identified above.



Photograph 5



Photograph 6



Photograph 7



Photograph 8



Photograph 9

- 1.37 It is apparent that a junction buildout arrangement option has been submitted by the applicant for the junction of Pencombe Lane with Panniers Lane. Vehicle tracking has been undertaken for the amended junction and it is evident that whilst agricultural vehicles (tractor and trailer) would likely be accommodated, they will certainly need to cross to a greater extent into the opposite side of the carriageway. Parking that occurs along the eastern side of Panniers Lane has not been considered.
- 1.38 Further to the above, it is understood that a relatively high number of agricultural vehicles turn at the junction of Panniers Lane with Pencombe Lane, a proportion of which travel to/from a local biodigester. Given the location of the junction in respect of the school, and in consideration of the parking that occurs along the eastern side of the carriageway, alteration of the junction should be carefully considered.
- 1.39 Controlled and uncontrolled pedestrian crossing options along Panniers Lane to access the footway along the eastern side of the carriageway, and also the school, have been presented. Again, parking along the eastern side of the carriageway and the associated issues with reduced visibility and general highway safety have not been fully considered by the applicant.
- 1.40 Photograph 10 presents an example of on-street parking that occurs along the eastern side of the carriageway.



Photograph 10

- 1.41 If a continuous footway along the western side of the carriageway is not feasible then it should not be assumed that the provision of pedestrian crossings will resolve the issue as the deliverability of the pedestrian crossings is uncertain and the pedestrian desire line will continue to be along the western side (pedestrians would unlikely cross the carriageway to again cross back further to the north).

Issue 3

- 1.42 Whilst the site is theoretically located within what are considered to be reasonable walk and cycle distances of Bromyard town centre, the route will not be attractive to pedestrians or cyclists.
- 1.43 Firstly, for the reasons identified within this report, the local highway conditions do not present a favourable environment to either pedestrians or cyclists. Furthermore, there are no facilities available or proposed for cyclists.
- 1.44 The site is located at around 176m above sea level and the town centre at around 122m. The approximate level of difference around 54 metres provides an indication of the local topography and the gradient of highway to the town centre. Opportunities outside of the town centre are relatively limited.

- 1.45 It is understood that new bus stops will be provided such that potential future residents of the development are located within 400m walking distance of a bus stop. However, it is unclear where the bus stops can be safely located.

Summary and Conclusion

- 1.46 The applicant has presented information that identifies pedestrian connectivity and integration. However, in consideration of the scale of development proposed and the number of pedestrian trips that would (or should) be generated, there are significant deficiencies that need to be addressed.

- 1.47 It is considered that the issues identified are fundamental and should be addressed at this stage rather than deferred to a future reserved matters application and/or detailed design stage.

- 1.48 Paragraphs 108 and 109 within Section 9 of the NPPF 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;

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.

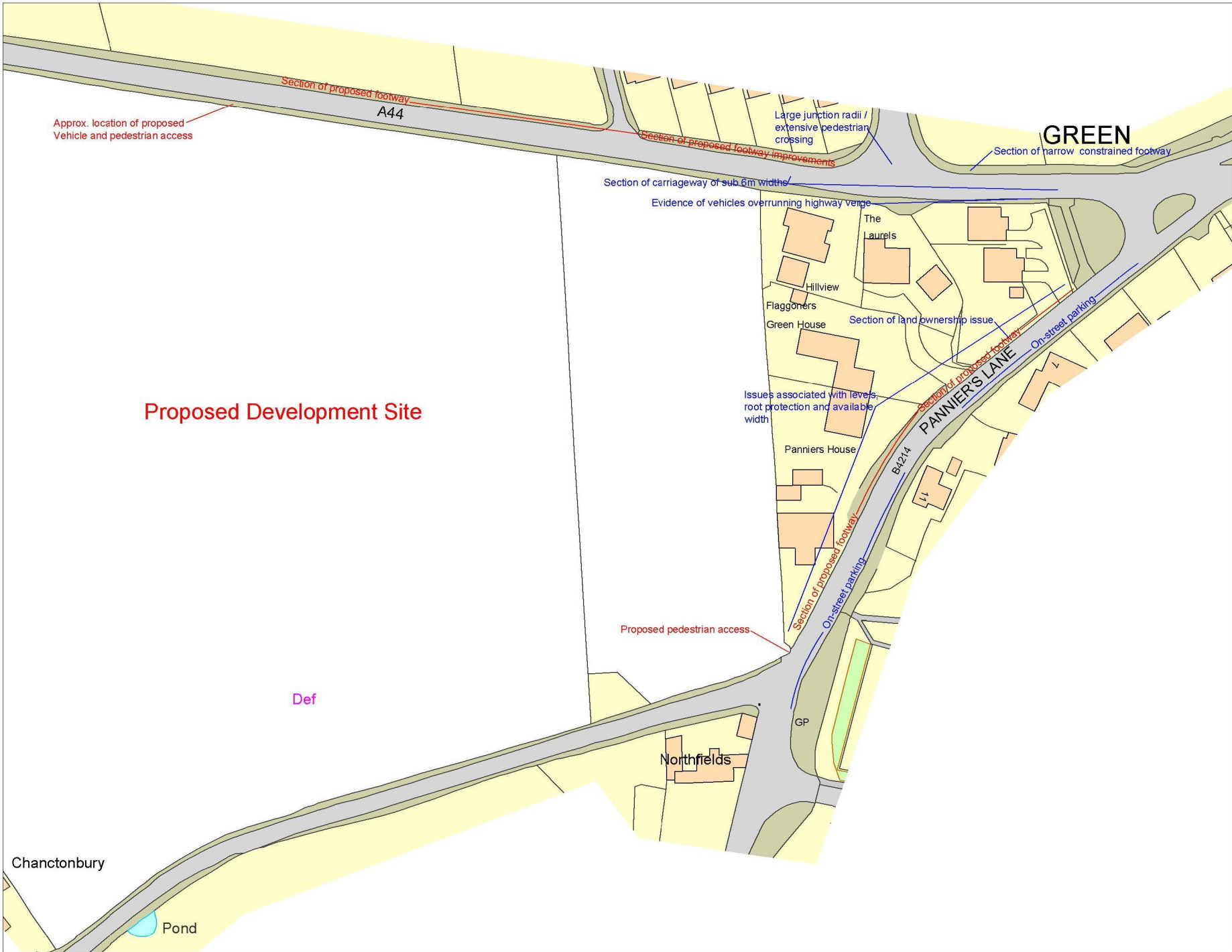
Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

- 1.49 For the reasons identified within this report, it is highly unlikely that safe and suitable access to the site can be achieved for all users.

- 1.50 Based on the above and preceding sections of this report, the development proposals do not comply with the NPPF.

JL April 2021 Version 01

Appendix A: Drawing FCL0041-01



Rev.	amendment	checked	date

FLOW

Consult Limited

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Client

Project

Land off Pencombe Lane
of Herd Stand Area for Parking

Scale 1:500 @ A4 Drawn by JL Checked by

Date APRIL 2021 Cad file FCL-0040-01.DWG

Title

Issue location Plan

Drawing number FCL-0040-01 Rev.