

From: [Myles Kidd](#)
To: [David Stockdale](#)
Cc: [DCTransport](#)
Subject: P21/03344/F - Transportation response 20210708
Date: 08 July 2021 16:43:00
Attachments: [image002.png](#)

Dear David

The below is my response on the application, which is to object in terms of travel sustainability, as well as on safety grounds relating to the proposed access junction which is not supported by ourselves or our highway engineering colleagues. The car parking provision is significantly in excess of the PSP minimum provision without justification being provided, and there are a few details on the refuse collection strategy and vehicle dimensions used for tracking which don't follow our SPD guidance.

Should the weighted balance in the report be to recommend approval, then we would need the design of the access junction to be resolved, as well as the parking provision to be amended or justified; refuse collection strategy to be amended and tracking of waste vehicles to be for the waste vehicles our contractor use (as set out in the waste SPD); conditions requiring EV charging to be provided in line with emerging policy; and developer funding / implementation of (to be agreed) traffic calming measures; the signalised pedestrian crossing proposed; and bus shelters.



We note the proposal for 35 dwellings to the west of the settlement boundary of the village of Old Sodbury, including the proposed vehicular and main pedestrian access from the A432 Badminton Road, as well as the Public Right of Way (PRoW) that runs north south through the middle of the site.

The relevant documents of the Transport Assessment; Planning Statement; Design and Access Statements as well as plans including Parking and Cycle; Planning Layout; Refuse and Recycling; Landscape; and several house arrangement and garage layouts have been reviewed.

Transport Development Control provided comprehensive pre-application advice confirming that in transport terms the sites location in terms of travel sustainability was a significant concern, as was highway safety of a new junction on a road where speeds are a known concern, and where there are Personal Injury Collisions (PICs) and historically have been significant numbers of PICs.

In sustainability terms, our concern of this relatively rurally located development is remote from walkable day to day and is very likely to lead to a car dependent development, contrary to Core Strategy policy CS8, and PSP11. There are few local facilities to meet day to day needs, together with limited sustainable travel options for facilities not found locally within the village.

In safety terms, our concerns relate to the proposed access design, the speed of traffic on the A432, noting that Badminton Road is subject to a 30mph speed limit at the proposed entrance, but also noting that 85th percentile speeds are significantly higher than the speed limit. The pre-app advice recommended reviewing the detail of the PICs which would be reviewed alongside and help inform measures to manage speeds and reduce the concerns of further injury collisions.

Sustainability

Following the concerns raised in the pre-app, the Transport Assessment provides long extracts from the NPPF and extracts from JLTP, Local Plan PSP, and Parking SPD together with, in Section 5 of the TA, statistics from the National Travel Survey (NTS) to offer the perspective that the site is sustainable.

Using the NTS statistics from the general sample it represents, a 2km distance is argued by the applicant's consultants to be the maximum walking distance that the Council should consider rather than the local policy preferred maximums of 800m and 1,200m for most services and facilities set out in the PSP. Whilst we acknowledge this generalised information from the NTS from the annual sample of the population, and accept that walking as a mode does not have a definable distance limit in theory, in practise for many people the convenience of walking is affected by purpose and distance and related time, as well as influencing factors of the provided infrastructure / walking environment, the weather, the time of day, time of year, lighting and so on. We find much of the following suggestions in the TA on walking not to be likely: for example there is very little

within the parts of Chipping Sodbury within a 2km walk from the site so the on-going references have little meaning. Yate is also not "*just over*" 2km, it is significantly over 2km with its main shopping centre approximately 4km away, and the main industrial areas on its western side significantly further than this and at and beyond the train station.

In terms of encouraging walking as a genuine mode, our policies are set out in PSP11 where the walkable neighbourhood distances (referenced in Manual for Streets) of 800m are included, as are 1,200m distances. We suggest that walking along the mainly unlit A432 to and from Chipping Sodbury for local needs shopping for example is very unlikely compared to driving a car parked which would be parked close to the front door of the dwelling were the development to receive consent. In simple convenience terms car use is likely to dominate travel movement from this remote from facilities located site.

The bus service is described as frequent to which we have a different view. Two services pass the site as Service 85 mentioned in the Design and Access statement doesn't appear to route via Old Sodbury:

The Stagecoach operated 620 service (which interconnects with / becomes service 69 to and from Stroud), connects Old Sodbury with Yate and Bath and offers five services a weekday and four on Saturdays, with no evening services - the last bus to Yate is at 3:15pm.

The Coachstyle operated Service 41 connecting Yate with Malmesbury, with a 2 hourly service (4 during the day) leaving Old Sodbury from mid-morning .

Although numerically the number of daily services could be argued to be policy compliant in PSP11 terms of the minimum for a rural area implied in the PSP, they are not of a frequency that would encourage ad-hoc use, as missing a bus could mean a 2 hour wait, and the timetable considerably restricts travel purposes.

In our view, the site is not located in a sustainable place for travel as the locally provided facilities are very limited requiring travel beyond walking distance to Chipping Sodbury, Yate and further afield for the many facilities not found locally. Although there are bus services which may attract some of the future residents for some destinations, the services are limited in terms of their times of travel including return journeys. The local public transport infrastructure are simply poles without shelters, and there is no direct pedestrian crossing facility between the bus stops closest to the site. There is no local cycling infrastructure. The proposals to improve the local infrastructure from this development are for a signalised pedestrian crossing of the A432.

In travel sustainability terms our view is that in practise the development will be car dominated and we therefore **object on travel sustainability grounds**: CS8 of the Core Strategy, and PSP11 of the Policy Sites and Places Local Plan.

Parking

The car parking provision is unclear in terms of its schedule and PSP16 requirements which we calculate to be a minimum of 69 spaces which includes 7 visitor or unallocated spaces. The proposal is for 86 allocated (relating to a dwelling) spaces and 5 visitor spaces (91 in total) which significantly exceeds the PSP16 requirement and encourages the view that this development is likely to be car dominated. Justification is sought on this level of provision.

The cycle parking provision appears to be correct from the plans with separate sheds where there aren't garages, and garage dimensions that accord with the PSP16 internal dimension requirements to include for secure and covered cycle parking. We note that the parking layout suggests parked cars outside of garages may prevent access to any bicycles inside.

Electric Charging

If recommended for approval, we would require the development to provide electric vehicle charging in line with our emerging EV policy, which is for all individual dwellings with one or more dedicated parking spaces or garage to include provision for 7Kw (32 amp) charging infrastructure suitable for charging an electric or other ultra-low emission vehicle.

At least one parking space per dwelling must have active charging provision, with the remainder passive provision: passive provision is defined as establishing all of the associated cables, chambers and junctions to allow for charging points to be installed without the need for undertaking works that require breaking ground.

For residential development with communal off street parking provision, at least 20 per cent of spaces are required to have active charging facilities, and passive provision is required for all remaining spaces.

Refuse and Recycling collections

The tracking diagrams for the Phoenix 2 Duo have a turning circle that allows more flexibility than the Dennis Eagle Elite 2 - 3

axle, 6x4 referenced in detail in our Waste & Recycling Collection SPD adopted March 2020 (page 17: 20.3 metre turning diameter) so will need to be re-tracked to be acceptable.

The centralised waste collection points do not seem to follow the Waste SPD which states that "...distance from property to external storage points - maximum of 10m..." where the plan suggests up to 30m *as the crow fly's* distances.

Highway, Access and Road Safety

Traffic Speeds and Calming

As shown in the TA and demonstrated by public perception through the objections and comments received, 85th percentile traffic speeds are significantly higher than the 30mph speed limit on Badminton Road at the proposed access. We note that the proposal will be set back from the A432 behind allotments, so the housing development won't be easily visible from the A432 which will remain as a relatively open road with good visibility and little active frontage to encourage drivers to reduce speeds.

The proposal to enhance / add more prominent village gateways to encourage reduced speeds will be considered, as will the proposal to include a signalised pedestrian crossing of the A432, where the speed of traffic leading to the crossing is an important element.

Site Access

The access proposal, which includes narrowing the width of A432 Badminton Road to enable the DMRB visibility splays for 40mph to be achieved is **not supported by the highway authority**. The narrowing is suggested to help reduce vehicle speeds but this is not demonstrated either by reference to technical guidance or to similar as-built examples which could statistically demonstrate road safety improvements. In the pre-application work a safety audit was recommended with the application but was not provided.

We require an access junction that could achieve appropriate visibility splays without this buildout / narrowing of the A432.

We cannot agree on the current access design and would need to see revised proposals and a Road Safety Audit relating to the revised proposals with an agreed brief in advance of the audit.

An assessment of road related personal injury collisions was recommended in the pre-app but a simplified overview has been undertaken without looking at the detail and potential contributing issues. It is noted that there have been many PICs on this stretch of Badminton Road historically.

Traffic Generation and Impact

We accept that in terms of traffic generation without necessarily agreeing with the TRICS generation figures, that there would be no severe impact in terms of added congestion and queueing on the highway.

Kind Regards

Myles

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From: [Myles Kidd](#)
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Subject: P21/03344/F - updated Transportation response 20210729
Date: 29 July 2021 10:46:00

Dear David

We responded to the proposal for 35 dwellings to the west of the settlement boundary of the village of Old Sodbury in late June through **objecting on sustainability grounds** because of its distance from facilities and likely reliance on car based travel, and effectively objecting to the proposed access junction build-out into the A432 confirming as Local Highway Authority we would not support the narrowing: within our response we requested the developer reconsider their access junction proposals to be designed without the proposed buildout.

Since that time a road safety audit has been proposed for the unamended access layout which would narrow the westbound half of the A432.

To update our previous comments which remain valid, and put our position clearly: **we object to the access junction proposals** because of the proposed build out into / narrowing of the A432. The A432 is a strategic route and is part of the Major Road Network (MRN) and part of its strategic function is to cater for its traffic flows including the mix of HGVs and cyclists. Irrespective of the outcome of the road safety audit, we have safety concerns over the narrowing which could cause issues between cyclists and other traffic including HGVs. In addition and accepting there are no proposed schemes on this stretch of the MRN at this point in time, the build out could prejudice any future scheme to encourage cycling or other measures on this route. Furthermore, we do not agree with the principle of a build outs in this location, which is provided solely to enable visibility splays - a more usual solution would be to achieve visibility splays using land / verges adjacent to the access junction, and no reasons have been provided to demonstrate why that is not possible.

Kind Regards,

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