

Technical Note 2

Title	Rebuttal to SGC Highways Comments on application P21/03344/F.		
Prepared by	DRT	Checked by	DRT
		Reviewed by	PM
Date	15 th October 2021	Version	1.0

1. Introduction

- 1.1. This note has been drafted in response as a rebuttal to objections received from South Gloucestershire Council (SGC) Highway officer on 14th July 2021. A response to the comments was sent to SGC on 8th September 2021. An email reply was received the same day but did not appear to comment on issues raised in the response. An email response was submitted to SGC on the 16th September 2021 addressing the comments in the email, but no reply has been received to date.
- 1.2. This note addresses the three main objection points raised by SGC. Other points of contention, such as vehicle swept path plots, electric vehicle charging points, review of accident data, etc are either considered dealt with, or a minor issue that can be resolved easily.

2. Sustainability

- 2.1. SGC state that they do not consider the site sustainable.

Response

- 2.2. Policy PSP 11 of the SGC Local Plan: Policies, Sites and Places Plan (adopted November 2017) sets out transport impact management. It sets out where development which will generate a demand for travel should be located to be acceptable.
- 2.3. PSP11 states: Development proposals which generate a demand for travel, will be acceptable where:
 - 3 i residential development proposal(s) are located on:*
 - i. safe, useable walking and, or cycling routes, that are an appropriate distance to key services and facilities*
 - and then*
 - ii. where some key services and facilities are not accessible by walking and cycling, are located on safe, useable walking routes, that are an appropriate distance to a suitable bus stop facility, served by an appropriate public transport service(s), which connects to destination(s) containing the remaining key services and facilities; and*
- 2.4. The local facilities that are within a walk of the site include local primary school is some 700m walk from the site access, the village hall some 450m and the petrol filling station which include a small shop is some 300m.

- 2.5. Walk routes to the above facilities would be improved by a controlled crossing within the village, which the applicants have proposed.
- 2.6. It is acknowledged that not all facilities and services are walkable from this site, and therefore section ii becomes relevant, which states that developments will become acceptable if "served by an appropriate public transport service(s)". PSP11 then goes on to provide a definition of appropriate public transport service
- An "Appropriate public transport service(s)" as a minimum means:*
- i. Individual or combined services, total journey time under 1 hour; and*
 - ii. at least 5 services a day during the week, 3 at weekends, to and from the destination; and*
 - iii. during the week; one service arriving at the destination before 9am, and one leaving after 5pm*
- 2.7. Using the above criteria, and the latest bus stop data, the information is as follows (note that latest bus stop information differs from that in the original TA):
- i. The journey time to Chipping Sodbury is between 3 and 10 minutes, to Yate 6 to 11 minutes, and 46 minutes to Malmsbury
 - ii. Including school services, there are 12 services a day westbound and 13 eastbound and eight on a Saturday. Excluding the school services there are eight services a day.
 - iii. There are two services arriving before 09:00 for westbound and three eastbound. After 17:00 there is three services westbound and three eastbound.
- 2.8. The bus stop timetables from Traveline are appended to this note.
- 2.9. This confirms the location is sustainable under PSP11, as confirmed by SGC who stated in their response "*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*". It is difficult to see how non-compliance with PSP11 can be evidenced in this context.

3. Parking

- 3.1. SGC state that PSP16 requirements require 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 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.

Response

- 3.2. Policy PSP16 states "New development proposal(s) will be acceptable where the following standards are met:" and then goes on to provide minimum parking standards for residential houses. It does not provide an optimum or maximum standard. The level of parking proposed has been formulated in

response to policy and also to consider local concerns raised during public consultation that the development must ensure that parking does not occur on the public highway.

- 3.3. Further comments were made by SGC that if residents stored cycles in garages, then cars parked close to the garages could restrict the opening of the garage door, and therefore restrict residents access to cycles.
- 3.4. By providing more spaces than the minimum requirement, this allows residents more space to park, so their vehicle is not against the garage door. In light of the above, the layout can easily be adjusted to allow space between parking spaces and garage doors.

4. Access

- 4.1. SGC require an access that does not propose a build-out.

Response

- 4.2. The posted speed limit on Badminton Road is 30mph. However, personal observations were that vehicle speeds, particularly westbound traffic down the hill were likely to be higher than the speed limit.
- 4.3. The existing access has suitable visibility for the posted speed limit (30mph speed limit required 43m visibility splays using Manual for Streets). As speeds on the A432 were perceived to be higher than the posted speed limit, we commissioned a speed survey. The resultant 85th percentile speeds required a visibility splay of 120m based on DMRB. In order to avoid a third-party boundary wall to the east of the site, a small build-out was proposed. This narrows the carriageway from 7.3m to 6.8m (3.4m lane widths in each direction).
- 4.4. SGC requested a Road Safety Audit of the proposed access. The brief and CVs of the audit team were agreed in advance. SGC requested that the following was added to the brief:

Local Highway Authority's (LHA) concerns

- *on the proposal's potential detrimental effect on cyclists as the A432 is a strategically important route (part of the major road network [MRN]) used by both cyclists and HGVs;*
 - *and on the principle of building out into the highway, and in particular the MRN, solely to enable visibility splays which the LHA do not support.*
- 4.5. The audit found no road safety issues.
 - 4.6. The audit considered concerns raised by the LHA, which were included in the brief.

- 4.7. The auditors considered that the A432 is not shown as a recommended route on South Gloucestershire's Regional Cycle Map, and therefore likely favoured by more confident cyclists. The proposed narrowing to 6.8m is considered adequate for cyclists.
- 4.8. On the second point considered is the Auditor commented "*The auditors do not object to the principle of building out a kerbline to enable visibility splays, which is a fairly common practice. The auditors consider every such proposal in isolation, to determine if there are any adverse safety implications, which would then be raised in the audit report. In this case no such adverse implications have been identified.*"
- 4.9. The RSA recommended an uncontrolled crossing, to provide access to the eastbound bus stop, which is supported, and the applicants are happy for this to be secured vis S106 agreement contribution.
- 4.10. The RSA including the brief issued to the auditors is appended to this note.

5. Conclusions

- 5.1. The site meets the sustainability criteria as set out in PSP11.
- 5.2. Parking is in line with local standards
- 5.3. The Road Safety Audit and collision data have identified no safety issue with the proposed site access, specifically including the slight build out proposed.
- 5.4. NPPF states:

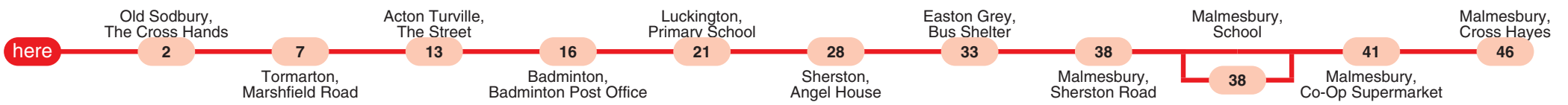
Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

- 5.5. Given that no highway safety reasons have been identified, and the impact on the local road network would not be severe, there should be no reasons for refusal on highway grounds.
- 5.6. In SGCs highway comments, it was accepted 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.*"

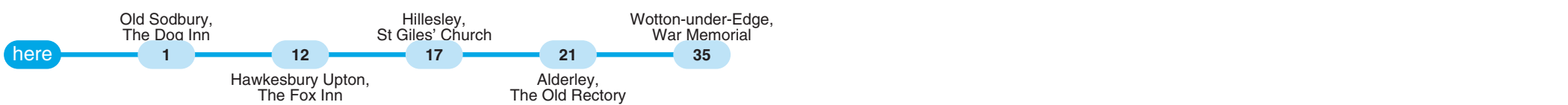
Bus Stop Timetable

Bus departures from this stop Old Sodbury Commonmead Lane (E-bound)

41 Yate - Chipping Sodbury - Acton Turville - Easton Grey - Malmesbury Coachstyle



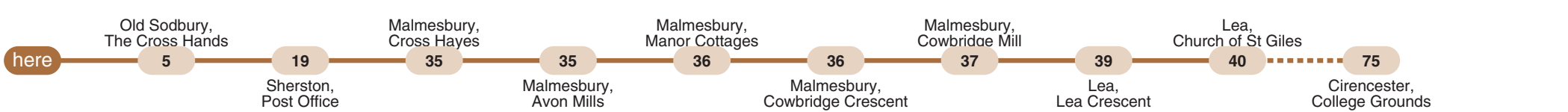
85 Yate - Chipping Sodbury - Wotton-under-Edge Stagecoach West



620 Bath - Wick - Pucklechurch - Yate - Chipping Sodbury - Old Sodbury Stagecoach West



C62 Yate - Cirencester College Stagecoach West



C62 Yate - Malmesbury Stagecoach West



The numbers circled indicate approximate timings in minutes from Old Sodbury, Commonmead Lane

Mondays to Fridays Bus times as at 14th October 2021

Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note
0715	85	Sch	0730	C62	M,Sch	1106	41		1306	41		1506	41	1	1748	620	
0730	C62	C,Sch	0838	620		1138	620		1438	620		1716	41		1848	620	

Saturdays Bus times as at 16th October 2021

Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note
1106	41		1138	620		1306	41		1438	620		1506	41	1	1716	41	
															1748	620	
															1848	620	

Sundays

No Service

Notes: Sch - Cirencester College Days Sch - South Gloucestershire School Days 1 - serves Malmesbury, School C - towards Cirencester M - towards Malmesbury
Times shown in italics are approximate times

BY SMS

Bus times by
text message



Get the times of the next four buses
from this stop on your phone

Scan the QR code or send the stop code below to:

84268

Return texts cost up to 25p, plus normal text messaging charge.
Normal mobile internet charges apply.

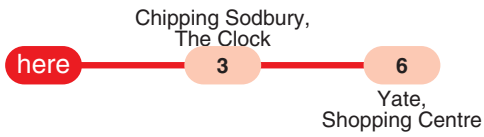
Code for this stop: **sglpamg**

NextBuses

Bus times by
mobile browser



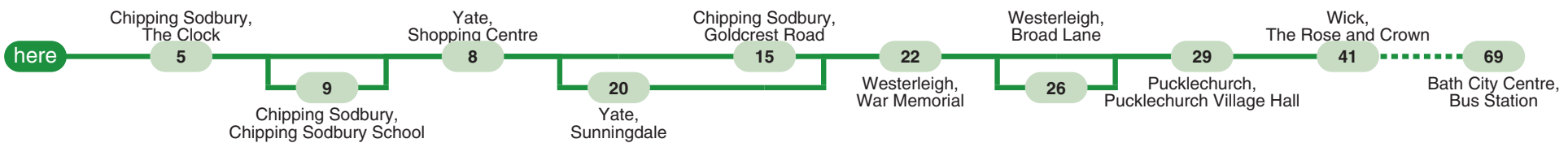
41 Malmesbury - Easton Grey - Acton Turville - Chipping Sodbury - Yate Coachstyle



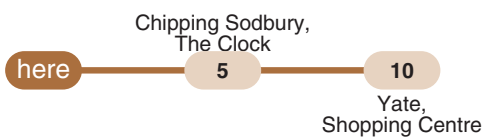
84 Wotton-under-Edge - Yate Stagecoach West 



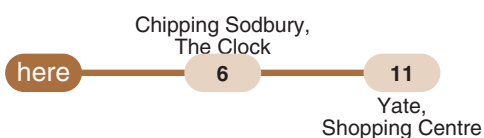
620 Old Sodbury - Chipping Sodbury - Yate - Pucklechurch - Wick - Bath Stagecoach West 



C62 Cirencester College - Yate Stagecoach West 



C62 Malmesbury - Yate Stagecoach West 



The numbers circled indicate approximate timings in minutes from Old Sodbury, Commonmead Lane

Mondays to Fridays Bus times as at 14th October 2021

Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note			
0618	620		0918	620		1218	620		1448	41		1518	620	1,2,3,Sch	1702	41		1724	C62	Sch
0718	620		1048	41		1248	41		1518	620	SH	1535	84	Sch	1724	C62	Sch			

Saturdays Bus times as at 16th October 2021

Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note	Time	Service	Note						
0718	620		0918	620		1048	41		1218	620		1248	41		1448	41		1518	620		1648	41	

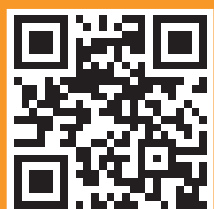
Sundays

No Service

Notes: **Sch** - Cirencester College Days **SH** - South Gloucestershire School Holidays **2** - serves Westerleigh, Broad Lane **3** - serves Yate, Sunningdale
Sch - South Gloucestershire School Days **1** - serves Chipping Sodbury, Chipping Sodbury School
 Times shown in italics are approximate times

BY SMS

Bus times by
text message



**Get the times of the next four buses
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Return texts cost up to 25p, plus normal text messaging charge.
Normal mobile internet charges apply.

Code for this stop: sglpamt

NextBuses

Bus times by
mobile browser



Road Safety Audit

ROAD SAFETY AUDIT BRIEF 2.0				
Scheme Title	Land South of Badminton Road, Old Sodbury			
Client	Grass Roots Planning			
Audit Stage	1	1/2	2	3
Terms of Reference	The Stage 1 Road Safety Audit (RSA) is to be undertaken fully in accordance with the DMRB Standard GG 119, as well as the contents of this Road Safety Audit Brief			
Designer	Key Transport Consultants Ltd (David Tingay BSc(Hons) MCIHT)		Date	19/07/21
Scheme Description	Up to 35 residential dwellings served from a new priority junction in the same location as the existing field access			
Plans Submitted	<ul style="list-style-type: none"> Transport Statement, include: <ul style="list-style-type: none"> Existing flows and speeds on main road Development flows 5-year accident data Revised Figure 3A (replaces Figure 3 in TS) 			
Supporting Information (please provide further information where applicable)				
Departures from Standards: No departures from standards identified.				
Are there any works not yet complete? (Stage 3 only) N/A				
Is this site part night lit? Yes				
Please specify nearby trip generators None				
Design Standards Applied to the Scheme: Manual for Streets and DRMB (See TS – Vehicle speeds greater than 37mph)				
Speed Limits/Design Speeds: 30mph speed limit – see Transport Statement for recorded vehicle speeds				
Existing Traffic Flows/Queues: See TS				
Forecast Traffic Flows/Queues: See TS				
Non-Motorised User Desire Lines: <ul style="list-style-type: none"> Bus stops school petrol station/small shop village hall 				
Personal Injury Collision Details: Attached				
Should this site be visited at any particular time of day?				
Other: The proposed access includes a build-out of some 550mm into the carriageway, narrowing Badminton Road from some 7.3m to 6.8m at the site access. This is required in order to achieve				

visibility commensurate with the recorded vehicle speeds.

Local Highway Authority's (LHA) concerns:

- on the proposal's potential detrimental effect on cyclists as the A432 is a strategically important route (part of the [major road network](#) [MRN]) used by both cyclists and HGVs;
- and on the principle of building out into the highway, and in particular the MRN, solely to enable visibility splays which the LHA do not support.

Road Safety Audit – Badminton Road, Old Sodbury

Stage: 1

Location: Land adjacent to Hammerdown, A432 Badminton Road, Old Sodbury, South Gloucestershire

Site: Proposed improved access for 35 residential units

ATSS Ref: 210705

Client Ref:

Date: 16 August 2021



Project Details

Report Title:	Stage 1 road safety audit, A432 Badminton Road, Old Sodbury
Date:	16 August 2021
Document reference and revision:	210705 V1
Prepared by:	Avon Traffic & Safety Services Ltd
On behalf of:	Key Transport Consultants Ltd

Report Control Sheet

	Name	Position	Date
Audit requested by	David Tingay	Key Transport Consultants Ltd	19 July 2021
Team leader	Nick Jeanes	Team Leader	
Team Member	Darren Cox	Team Member	
Observer			
Draft report issued by	Nick Jeanes	Team Leader	6 August 2021
Final report issued by	Nick Jeanes	Team Leader	16 August 2021
Designer's response issued by			

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1. Introduction

- 1.1 Avon Traffic & Safety Services Ltd has been commissioned by Key Transport Consultants Ltd, to undertake a Stage 1 Road Safety Audit, with regard to the proposals to improve a vehicle access for a residential development off of A432 Badminton Road, Old Sodbury. The proposals include a new bellmouth priority junction at an existing farm field access. To gain the required visibility, the verges either side of the access are proposed to be pushed out slightly, reducing the A432 road width to 6.8 metres.
- 1.2 The RSA Brief was supplied by Key Transport Consultants Ltd and accepted by the Audit Team. The Brief and Audit Team were approved by David Tingay, Director, Key Transport Consultants Ltd. Within the brief, the Local Highway Authority asked the auditors to consider:
- a) the proposal's potential detrimental effect on cyclists as the A432 is a strategically important route (part of the major road network [MRN]) used by both cyclists and HGVs; and
 - b) the principle of building out into the highway, and in particular the MRN, solely to enable visibility splays which the LHA do not support
- 1.3 The A432 is a major route linking Chipping Sodbury/Yate to the west, with the A46 and M4 to the east. At the audit site the road displays a mainly rural character, being bounded by trees and fields, although the village of Old Sodbury is a short distance to the east. To the west of the existing access (which is on the south side) the road is generally straight and level, whilst to the east describes a long shallow curve to the right, as it begins a slight rise. There is a continuous footway on the north side, and a footway on the south side between the audit site and the village of Old Sodbury. The access is included in the village street lighting system, which begins some 70 metres to the west. The speed limit at the site is 30 mph, which changes to 40 mph approximately 170 metres to the west. There are bus stops in both directions, both approximately 50 metres from the access.
- 1.4 The audit team members are:
- | | | |
|-------------|---|-------------|
| Nick Jeanes | – | Team Leader |
| Darren Cox | – | Team Member |
- 1.5 The audit took place during August 2021 and comprised of an examination of the documents/plans listed in Appendix A. The auditors visited site together on Thursday 5 August between 10.00 and 10.45am when the weather conditions were overcast with slight drizzle. Vehicle flows were moderate and speeds appeared slightly above the posted speed limit. A small number of pedestrians and cyclists were observed. No buses were observed using the bus stops during the site visit.

- 1.6 Data from Crashmap.org show that there have been no reported collisions involving injury, in the 5 years 2016-2020 inclusive, in the vicinity of the proposals. Collision data supplied within the transport assessment has highlighted collisions occurring no closer than 300 metres to the site.
- 1.7 Traffic data supplied indicates that the A432 carries a 2-way daily flow of approximately 12,200. Speed surveys returned 85%ile speeds of 40 mph (westbound) and 36 mph (eastbound)
- 1.8 The audit team have not been made aware of any departures from standards or relaxations in relation to the proposed scheme.
- 1.9 The audit was carried out under the terms and conditions of DMRB GG 119. The team examined and reported only on the road safety implications of the scheme as presented and has not examined or verified the compliance of the design with any other criteria. However, reference may be made to National/Local Guidance in order to verify a point.
- 1.10 Documents and drawings examined in this safety audit are listed at Appendix A.

1.11 General views of site



Audit site looking west. The site access will be just past the cream wall, on the left



Audit site looking east. The site access will be just in advance of the oncoming white vehicle, on the right



Exiting driver's view to left and right from proposed access, taking into account the proposed buildout/advanced give way line

2. Safety Issues Raised in this Stage 1 Road Safety Audit. (see Appendix B for locations)

2.1 No road safety issues were identified by the auditors

2.2 In response to the Local Highway Authority's concerns, the auditors provide the following comments:

- a) *the proposal's potential detrimental effect on cyclists as the A432 is a strategically important route (part of the major road network [MRN]) used by both cyclists and HGVs*

The A432 is a busy major road carrying large traffic volumes and heavy vehicles, which features a major climb shortly to the east of the audit site, and is not featured as a recommended cycle route on the South Gloucestershire Regional Cycle Map. As such it is likely to be favoured by fit and confident adult cyclists, but not by less confident riders or families. The proposed reduction of the road width to 6.8 metres, local to the access, is considered adequate provision for such cyclists. The general arrangement plan suggests that the centre line will be moved northward as part of the scheme, to provide two 3.4 metre wide running lanes, and the auditors support this.

- b) *the principle of building out into the highway, and in particular the MRN, solely to enable visibility splays which the LHA do not support*

The auditors do not object to the principle of building out a kerbline to enable visibility splays, which is a fairly common practice. The auditors consider every such proposal in isolation, to determine if there are any adverse safety implications, which would then be raised in the audit report. In this case no such adverse implications have been identified.

3. Other Issues

3.1 No provision has been made for pedestrians to cross the A432 between the development and the eastbound bus stop. Recommend pedestrian drop kerbs and tactile slabs are included in the scheme to provide an informal crossing point.

4. Audit Team Statement

We certify that this audit has been carried out in accordance with DMRB GG 119

Audit Team Leader:

Name: Nick Jeanes MCIHT; MSoRSA; HE Cert. Comp.
Director

A handwritten signature in blue ink, appearing to be 'N. Jeanes', with a stylized, flowing script.

Signed:

Date: 16/8/2021

Audit Team Member:

Name: Darren Cox FIHE; MSoRSA; HE Cert. Comp.
Senior Auditor

A handwritten signature in blue ink, appearing to be 'D. Cox', with a stylized, flowing script.

Signed:

Date: 16/8/2021

Appendix A: Information Utilised in this Stage 1 Road Safety Audit

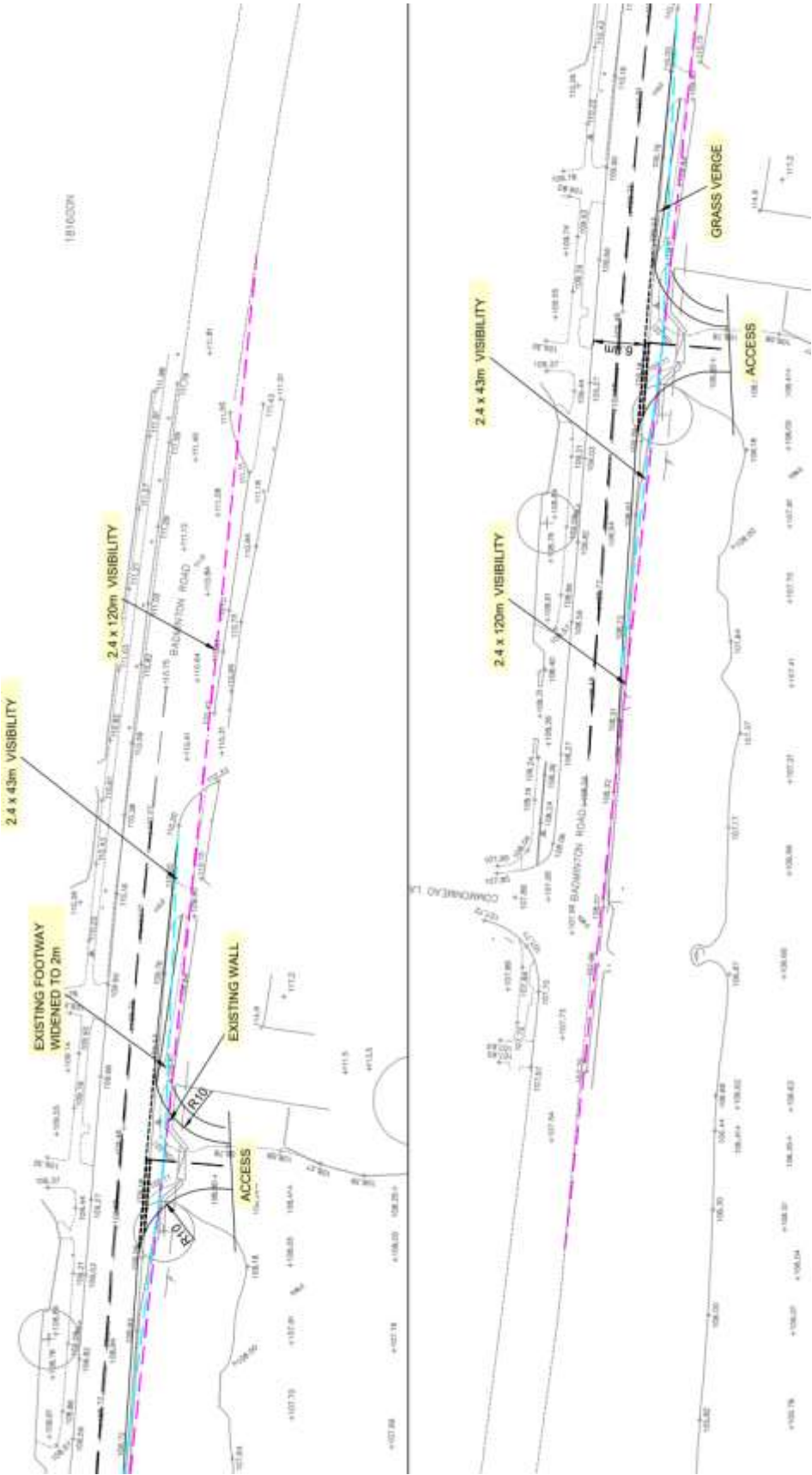
Drawings:

General Arrangement

5 year collision data (1/6/16-31/5/21)

Transport Statement (Key Transport Consultants March 2021)

Appendix B: Key Plan showing scheme proposals



Appendix C – Site location plan

