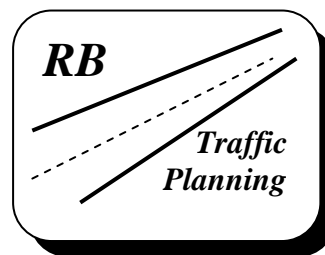


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**PROPOSED MIXED USE DEVELOPMENT
LAND TO THE REAR OF
14, CAMBRIDGE ROAD, STANSTED MOUNTFITCHET**

**COMMENTS ON HIGHWAY AND TRANSPORT MATTERS
IN SUPPORT OF OBJECTION TO PROPOSAL**

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15025obj

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1.0 INTRODUCTION

- 1.1 Rowland Bilsland Traffic Planning Limited are instructed by a group of 50 local people to consider highway and transport matters associated with the planning application, reference: UTT/15/1666/FUL submitted to Uttlesford District Council for development on the application site at 14, Cambridge Road, Stansted Mountfitchet.
- 1.2 The application proposal is for a mixed use development comprising residential dwellings, a ground floor retail unit with independent first floor office accommodation in a two storey commercial unit with frontage to Cambridge Road and a commercial building to provide three floors of office accommodation within the site, with frontage only to the site access road.
- 1.3 In Section 2 reference is made to the various documents submitted as part of the application which are relevant to the highway and transport consideration of the proposal.
- 1.4 Section 3 considers the applicant's Transport Statement. It comments on relevant highway matters including gross floor areas, car and cycle parking provision, site access arrangements, visibility splay requirements, trip rate analysis and highway safety.
- 1.5 Section 4 gives a brief summary of these various highway matters and draws the conclusion that the application proposal fails to take account of Local Plan Policy and would be prejudicial to highway safety.

2.0 CONSIDERATION OF DOCUMENTS SUBMITTED WITH THE PLANNING APPLICATION

- 2.1 To consider highway and transport matters, reference has been made to the planning application documents dated 27th May, 2015, including the Transport Statement, SLR reference: 418.05186.00003 dated May, 2015, the proposed site and location plan numbered BRD15/006/002-A, the context plan numbered BRD/15/006/001-A, the elevations drawing numbered BRD/15/006/004 and drawing 005 which illustrates the vehicle swept path analysis.

The Planning Application Form

- 2.2 At Item 3 of the application form the description of the proposal includes reference to a 2.5 storey commercial building within the site. Drawing BRD/15/006/004 gives a clear impression that the independent commercial building would have 3 full storeys.
- 2.3 At Item 10 of the application form it is indicated that the existing development has 50 car parking spaces and that the proposal would have 31 car parking spaces. As far as it is known, there has been no drawing submitted which indicates the current car parking provision or gives evidence of that number of spaces.
- 2.4 The proposed site and location plan numbered BRD/15/006/002-A shows provision of 22 car parking spaces for the residential development and 16 car parking spaces for the commercial development. This gives a total of 38 spaces. This is different from the number of parking spaces given in the application form.
- 2.5 Item 14 refers to the existing use of the site. The applicant indicates that the existing use is commercial/business units. The Design and Access Statement at paragraph 2.1 indicates that it is a vacant commercial site and that the commercial premises were demolished recently. There is no information in this application to indicate when the previous commercial use ceased.

- 2.6 Item 15 of the application form requires information on the existing and proposed internal floorspace and an indication of the net additional internal floorspace. The only floorspace figure that has been given is a proposed gross internal floorspace of 86 sq. metres for Class A1 use. It is clear that there are omissions in Item 18. It is particularly important to note that the application form fails to give any information on the floorspace of the proposed B1 office units.
- 2.7 At paragraph 2.2 of the Transport Statement there is information on the gross floor area for the previous warehouse, showroom and office buildings which suggests that the gross floor area of the previous use was 7,973 sq. metres. This information is not provided on the planning application form.
- 2.8 Item 20 refers to the hours of opening for the non-residential uses in the proposal. No information is given, in the application form, on hours of opening for the proposed retail unit or the other commercial uses.
- 2.9 Item 21 requests information on the area of the application site. It is indicated on the application form to be 0.42 hectare and in the Design and Access Statement as 4,300 sq. metres, equivalent to 0.43 hectare.
- 2.10 It is clear that the planning application form is deficient on a number of major items relevant to consideration of this application.

Drawings Submitted as part of the Application

- 2.11 Drawing numbered BRD/006/002-A illustrates the proposed development of the site, and includes a red line drawing which is assumed to show the boundary of the application site. There are areas included within the red line which are excluded from the proposed site plan. These are firstly, a narrow strip of land which the red line plan shows extending to Clarence Road, a small area illustrated as PTW parking to the rear of Plot 3 and the strip of land on the southwest side of Commercial Building 1 which is within the red line site but is excluded from the proposed site plan.

Design and Access Statement

- 2.12 Reference is made to the Design and Access Statement prepared by Landmark Town Planning Group. The document makes no reference whatsoever to the proposed access arrangements for the development.
- 2.13 In paragraph 2.0, dealing with the site location, it suggests that the M11 has relieved traffic from the former A1. That is not correct. It has relieved the former A11 route, now classified B1383, which includes Cambridge Road through Stansted Mountfitchet village.
- 2.14 In paragraph 2.9, reference is made to the larger commercial unit which is referred to as Commercial Unit 2 on the application drawing. It suggests that this *"commercial unit (B1 use), will begin the north residential mews terrace"*. This is factually incorrect. There is no mews terrace shown on the application drawing.

Submitted Transport Statement

- 2.15 Detailed comments on matters referred to in the Transport Statement are given in the following section of this report.

3.0 COMMENTS ON THE TRANSPORT STATEMENT

- 3.1 Paragraph 2 indicates firstly, that the application site is a vacant plot of brownfield land and secondly, that the previous occupants of the site left the area approximately 8 years ago. The same paragraph indicates that the gross floor areas of the warehouse, the former showroom buildings and the small office building were 4,224 sq. metres, 3,292 sq. metres and 457 sq. metres giving a total of 7,973, sq. metres. No evidence is provided to indicate whether this figure refers to the gross internal floor area or gross external floor area. The application form fails to give any information on floorspace for the existing use.
- 3.2 At 2.2.1 it is noted that immediately to the north of the site access there is the Tesco Express foodstore, in front of which there is an on-street loading bay, and that immediately to the south of the site access there is a marked and signed bus stop.
- 3.3 At paragraph 2.3 the Transport Statement gives gross internal floor areas of 194 sq. metres and 543 sq. metres for the two commercial units. This gives a total of 737 sq. metres which it indicates would be occupied by "mostly B1 use with A1 use on the ground floor".
- 3.4 The same paragraph indicates that there would be 38 parking spaces within the development including 22 spaces for residential development and 15 spaces for the commercial element of the development. This gives a total of 37 spaces. The application drawing shows 38 spaces.
- 3.5 The same paragraph refers to a commercial refuse store which is shown on the site plan to be to the southwest of an area of land between Commercial Unit 1 and Commercial Unit 2. There is no information on how access would be provided to that refuse store. It is noted that the land which appears to provide access to the refuse store is not within the red line area.

3.6 Paragraph 2.3.1 of the Transport Statement indicates that there is no proposal to change the existing access on to Cambridge Road except for removal of the existing security gates.

3.7 Section 3 makes reference to policy documents. Reference is made to Uttlesford Local Plan (2005) Policy GEN1 - Access. It indicates that, at sub-paragraph (c) -

"the design of the site must not compromise road safety and must take account of the needs of cyclists, pedestrians, public transport users, horse riders and people whose mobility is impaired".

3.8 Further reference is made to the Uttlesford Local Plan (2005) and to Development Control Policies. It indicates that the Development Control Policies DPD has a number of travel related objectives. These include Policy TR/g which reads as follows:-

"To improve the safety of travel for all people and all modes including measures to reduce the severity of road accidents."

3.9 Section 4 of the Transport Statement comments on the accessibility of the application proposal. At paragraph 4.2 it refers to the narrowest point of the site access road being 4.3 metres in width. The application drawing numbered BRD/15/006/002-A shows a constant 4.8 metres width for the access road within the application site. It fails to show the pinch point which has a width of only 4.3 metres. It is unclear what length of the access road would be subject to the reduced width of 4.3 metres. It is noted that the site access road would be a shared surface access which is considered appropriate for residential development.

3.10 However, a commercial unit, which is proposed for B1 Office use is shown within the main part of the application site with frontage to the site access road only. The car parking provision for that commercial unit comprises 8 parking spaces on the north side of the access road and 8 car parking spaces on the south side of the access road.

- 3.11 The proposed site plan numbered BRD/15/006/002-A, shows the width of the access to the 8 car parking spaces on the north side of the access road to be only 2.7 metres. This width is inadequate to serve the parking area.
- 3.12 It is considered that a shared surface access with a width of 4.8 metres is inappropriate to serve a development which includes a commercial unit of the size proposed, that is, with a gross internal floor area of approximately 565 sq. metres. A commercial use of that size would be expected to attract a greater proportion of commercial vehicles than a residential development and would be out of character with the overall development proposal.
- 3.13 The proposed site access road is designed with a turning head at the cul-de-sac end of the road adjacent to residential dwellings. The introduction of a commercial unit within the development would lead to that turning head being used by commercial vehicles, including heavy goods vehicles, making deliveries to Commercial Unit 2. That would be prejudicial to the safety and residential amenity of the proposed dwellings.
- 3.14 Section 5 of the Transport Statement deals with access and parking matters. Paragraph 5.2 gives details of the proposed site access. It indicates that -

"The access will remain the same, as a privately owned shared surface with the junction arranged as a footway crossover with dropped kerb."

- 3.15 Firstly, the planning application form at Item 6 indicates that there are new public roads provided within the site. That would suggest that the applicant would expect the site access road to be adopted by the highway authority. However, paragraph 5.2 of the TS indicates that the access road would remain as a privately owned road.
- 3.16 Paragraph 5.2.2 of the TS deals with junction visibility. It indicates that appropriate visibility splays are available at an "x" distance of 2.4 metres, for a distance of 80 metres to the south and 90 metres to the north.

- 3.17 However, it is a matter of fact that there is a bus stop located immediately to the south of the site access and a delivery vehicle loading bay on the frontage of the Tesco foodstore, immediately to the north of the site access. A bus stopped at the bus stop, or a commercial vehicle parked in the loading bay, imposes a severe restriction on visibility for a driver of a vehicle emerging from the site on to Cambridge Road.
- 3.18 It is clear that buses would stop frequently at the bus stop and that delivery vehicles would frequently park to make deliveries to the foodstore and to other nearby commercial properties on Stansted Road.
- 3.19 The Transport Statement fails to provide any information on the frequency of buses using this bus stop or the time for which they are stopped. It also fails to provide any information on the frequency of use of the loading bay or the time for which delivery vehicles are parked in the bay, obstructing visibility.
- 3.20 A bus stopped or a commercial vehicle parked would materially restrict site access visibility such that the movement of a vehicle emerging from the site access would result in a highway safety risk to the movement of vehicles along Cambridge Road. This would present an unacceptable risk, particularly to vulnerable road users including cyclists.
- 3.21 It is considered that this is a highway safety issue which is contrary to Policy GEN1 of the Uttlesford Local Plan (2005) and contrary to Development Control Policy TR/g.
- 3.22 The Transport Statement fails to make any reference whatsoever to provision of pedestrian visibility splays for the site access. It is generally recommended that pedestrian visibility splays of 2.0 metres x 2.0 metres should be provided on each side of a site access road behind the back edge of footway. Such visibility splays should be built into the design of the site access road to ensure pedestrian safety.

- 3.23 It is essential that drivers of vehicles emerging from the site access and pedestrians walking along the east side footway of Cambridge Road, have clear visibility of each other, in the interests of pedestrian safety.
- 3.24 In the case of this site access, it is acknowledged that previously pedestrian visibility splays have not been provided. However, that is not a reason for ignoring pedestrian safety in the preparation of the planning application for this new development.
- 3.25 It must be recognised that Cambridge Road runs through the centre of Stansted Mountfitchet village, in which there are numerous frontage retail and other commercial properties. Consequently, there is extensive pedestrian activity along the footways on each side of Cambridge Road. The Transport Statement has made no reference to the number of pedestrians using the footways.
- 3.26 Paragraph 5.3 makes further reference to the width of the access road. It indicates that the proposed site access road is designed as a 4.8 metres width carriageway. Paragraph 4.2 of the TS refers to the narrowest point being 4.3 metres in width.
- 3.27 Paragraph 5.6.1 of the TS deals with car parking. The TS indicates that each of the 10 residential dwellings would be provided with 2 car parking spaces and that a further 2 spaces would be provided for visitor parking. The Essex County Council and Uttlesford District Council documents, which refer to residential car parking standards, indicate that if the garage for a residential dwelling has internal dimensions less than 7 metres length and 3 metre width, the garage cannot be counted as a parking space.
- 3.28 Since there are no dimensions shown on the application drawing and no information given in the Transport Statement on the dimensions of the garages, there is no evidence to show that the residential parking provision satisfies the relevant parking standard.

- 3.29 It must be recognised that for each residential dwelling with 2 or more bedrooms, a minimum of 2 car parking spaces should be provided for residents and a minimum of 0.25 space per dwelling should be provided for visitors. This gives an overall requirement for 22 parking spaces for the residential development. It is acknowledged that the proposal drawing shows this number of spaces but without dimensions it cannot be determined that these are of adequate size. Since neither the application form nor the Transport Statement gives details of the proposed garages, there must be some doubt as to whether or not the proposed residential parking provision is satisfactory.
- 3.30 In the parking assessment, no reference has been made to the retail use of the ground floor of Commercial Unit 1. For A1 retail use (excluding foodstores) the Essex County Council's Parking Standards Document indicates a maximum of 1 car parking space per 20 sq. metres of gross floor area. Although there is no floorspace given on the application form for the proposed retail unit, it would appear to have a gross floor area of approximately 86 sq. metres. Application of the ECC parking standard for A1 use would indicate that the retail unit would be permitted a maximum of 5 parking spaces.
- 3.31 The gross floor area of Commercial Unit 2 has been excluded from the planning application form but it is understood from the TS to have a gross floor area of approximately 565 sq. metres for office use. The first floor accommodation of Commercial Unit 1 has a gross floor area of approximately 86 sq. metres which gives a total of 651 sq. metres for B1 use. Application of the ECC parking standard to that floorspace indicates that it would be permitted a maximum of 22 car parking spaces.
- 3.32 On the basis of the assessment of parking provision for the retail and commercial units, a maximum of 27 car parking spaces would be permitted. The drawing shows a provision of 16 car parking spaces which is considered to be inadequate for the floorspace proposed.

- 3.33 It is recognised that the number of spaces proposed is less than the maximum standard would permit. It is, however, considered to be insufficient in this central location in Stansted Mountfitchet village. Accordingly, there is a risk that overspill car parking from the commercial retail and office units could result in congestion on the access road as a result of unregulated short-stay and long-stay parking associated with those units. This would be detrimental to the safety of users of the access road.
- 3.34 If the site access road is retained in private ownership, it is unclear how on-street parking on the access road could be effectively controlled to maintain the access road clear for all vehicle movements associated with the proposed residential dwellings.
- 3.35 Paragraph 5.6.2 deals with cycle parking provision. The TS indicates that for the proposed residential dwellings, cycle storage would be on each property within the garage, shed or house. There is no information on the application drawings to illustrate any cycle parking provision.
- 3.36 For the proposed commercial development the TS indicates that 8 cycle spaces would be provided for staff and 4 cycle spaces would be provided for visitors. This combined provision of 12 cycle spaces is not shown on the application drawing.
- 3.37 Section 6 gives an estimate of vehicle trip generation. It makes the assumption that there is a lawful use which could be used as a basis for comparison of the number of vehicle movements for the existing and proposed uses. I understand that it is uncertain whether or not the site currently has a lawful use. This is a matter which is considered in the Planning Report prepared in support of the objection.
- 3.38 Paragraph 6.2.1 deals with the proposed residential use. It is somewhat surprising that this paragraph refers to data available for residential use with sites ranging from between 4,000 and 12,000 sq. metres of floorspace. Reference to floorspace

is normally made to commercial premises. It is assumed that there is an error in the wording of this paragraph.

- 3.39 The trip rate information which the applicant has used for derivation of the trip rates for residential development, is based on seven sites, only four of which are in England. There is a substantial amount of trip rate information for residential development available in the TRICS database for sites throughout England. It is considered that more realistic trip rates for the application proposal could be derived from trip rate data available for residential development in England, preferably for sites in the South East and East Anglia which may result in a different predicted traffic generation for the proposal.
- 3.40 Table 6-1 of the TS gives a summary of the vehicle trip rates for the existing B8 Warehouse use and Table 6-2 gives a summary of the OGV trip rates for B8 Warehouse use. Whilst the methodology is correct, the basis of site selection is considered to be inappropriate. It is normal practice to consider similar sites in a similar location for comparison with any particular proposal. There is a substantial amount of information in the TRICS database for B8 Warehouse use for sites in England which should provide data which is more comparable for the trip rate assessment.
- 3.41 It is illogical that the trip rate data from which the trip rates have been derived for B8 Warehouse use in the Transport Statement has been selected from four sites, one site in England, one site in Wales and two sites in the Republic of Ireland. It is considered that trip rate data for the more comparable sites in England should be used to derive more realistic estimates for the B8 Warehouse use.
- 3.42 Paragraph 6.2.2 refers to trip rate information for the proposed commercial use but no reference is made whatsoever to retail use. This is surprising because retail use has a higher trip rate than a B1 Office use which has been assumed for the entire floorspace of the proposed commercial use. On that basis it is considered that the trip rate assessment for the proposed commercial uses underestimates the number of trips which may be expected.

- 3.43 Paragraph 6.2.3 gives a summary of vehicle movements for the proposed residential development. It is considered that this has been prepared on the basis of trip rate information for sites which are not comparable with the application site. It should also be recognised that the trip rate analysis makes no reference whatsoever to the proposed retail use.
- 3.44 Section 7 of the applicant's Transport Statement gives a comparison of the number of vehicle movements expected for the previous B8 Warehouse use of the application site with the proposed residential and commercial uses of the site.
- 3.45 It is considered, that since the trip rate analysis for the existing and proposed uses refers to trip rate information from incomparable sites, there is no valid basis from which to determine that the proposal could lead to a reduction in the number of vehicle movements using the site access.
- 3.46 Accordingly, there is no justification for the applicant's contention that the application proposal would result in a reduction of vehicle movements to and from the site, the conclusion which is drawn in paragraph 7.2 of the applicant's Transport Statement.

4.0 SUMMARY AND CONCLUSIONS

4.1 The information provided on the application form has been found to be incomplete and incompatible with details provided in the Transport Statement on gross floor areas, car parking provision and the status of the site access road.

4.2 Reference has been made to relevant policies of the Uttlesford District Council Local Plan adopted in 2005. Specific reference has been made to Policy GEN1 which indicates at sub-paragraph (c) -

".... that the design of the site access must not compromise road safety and must take account of the needs of cyclists, pedestrians, public transport users, horse riders and people whose mobility is impaired."

4.3 It also makes reference to the Development Control Policies Development Plan Document which was adopted in July, 2007 and specifically to Policy TR/g which indicates the following objective:-

"....to improve the safety of all people and all modes, including measures to reduce the severity of road accidents."

4.4 It is considered that the design of the proposed site access is deficient in terms of the site access visibility splays and pedestrian visibility splays. The Essex Design Guide and national guidance require pedestrian visibility splays to be provided behind the back edge of footway on each side of the access, to a minimum standard of 1.5 metres x 1.5 metres and to a desired standard of 2.0 metres x 2.0 metres.

4.5 The site access visibility splays are subject to obstruction by goods vehicles parked in the delivery bay immediately to the north of the site access and by buses stopped at the bus stop immediately to the south of the site access. The design of the site access fails to make any provision whatsoever for pedestrian visibility splays on each side of the site access.

- 4.6 It is considered that the inadequate visibility splay provision and lack of pedestrian visibility splays at the junction of the site access road with Cambridge Road, is contrary to Policy GEN1 and Policy TR/g.
- 4.7 Consideration has been given to the provision of car parking spaces and cycle parking spaces for the proposed residential and commercial developments. Inadequate information has been provided to demonstrate that the car and cycle parking provision would accord with the Uttlesford District Council or Essex County Council car and cycle parking standards. On the basis of insufficient information, it has not been demonstrated that appropriate provision can be made for the residential development or for the commercial development.
- 4.8 There are discrepancies in the description of the proposed access and uncertainty as to whether it would remain as a private road or would be offered for adoption by the highway authority to form part of the public adopted highway.
- 4.9 The site access road is proposed as a 4.8 metres width shared surface access, although reference is made at paragraph 4.2 of the TS to the narrowest point of the access road having a width of only 4.3 metres. This is considered to be reasonable for residential development but it is not a generally accepted type or width of road to serve commercial development of the scale proposed in this planning application.
- 4.10 The site access provides a turning head for all vehicles at the cul-de-sac end of the road. Subsequently, any vehicle servicing the commercial development would proceed along the entire length of the residential road to the turning head thereby adversely affecting residential amenity of the proposed dwellings.
- 4.11 The conclusion is drawn that insufficient information has been provided in the application to demonstrate that the proposed development would satisfy relevant policies of Uttlesford District Council and Essex County Council. Consequently the overall conclusion is drawn that the application proposal would be prejudicial to highway safety.