

Development Management,
Harrogate Borough Council,
PO Box 787,
Harrogate
HG12RW
(sent via email)

Date: 09/11/2018

Dear Sirs,

Re: 18/04288/OUTMAJ: Outline Application for Erection of up to 48 no. Dwellings with Access considered, Spring Lane Farm, Yew Tree Lane, Harrogate, North Yorkshire, HG3 1NR (the "Application")

This correspondence is a formal objection to the Planning Application 18/04288/OUTMAJ. It has not been demonstrated in the supporting material that "safe and suitable access to the site can be achieved for all uses" (NPPF, 2018, para. 108b). A review of the application (Drawing: 17088/GA/02) has identified the following areas of concern:

1. Junction spacing;
2. Visibility;
3. Servicing;
4. Requirement of 3rd Party Land to deliver the access.

The proposed site access arrangements are based on drawing 17088/GA/02 provided at Appendix D of the submitted Transport Assessment (TA). The general arrangement (GA) drawing does not provide any dimensions for the proposed access, however, at para 3.2.1 of the TA, a road width of 5.5 metres with 6 metre kerb radii on to Yew Tree Lane is stated. Footways measuring 2 metres are also proposed (para 2.3.1). Using the proposed junction measurements, the PDF drawing available on the planning portal can be scaled using AutoCAD for analysis.

1. The proximity of the proposed access to existing junctions on Yew Tree Lane poses a potential highway safety risk.

The proposed access is to be located adjacent to an existing access point. From centre line to centre line, the distance between the two junctions' is measured at

12 metres. The access is also proposed opposite a residential driveway. The junction spacing would lead to potential concerns over confusion as a result of vehicles having the potential to make multiple movements, however a simple indicator will not provide other road users with an accurate indication of their direction of travel. There could also be the potential for conflict over the right of way amongst drivers in this area.

Junctions spacing is typically advised at a minimum of 20 metres. Importantly, if the junction was cited 8 metres further south, to achieve the 20 metres spacing, then visibility to left could not be achieved without building further out into Yew Tree Lane carriageway or using 3rd party land (Pannal Methodist Church).

The junction proximity would also prove problematic to tie in with the existing footways with proposals having to tie into an existing dropped vehicle crossover to the north, indeed the submitted drawing shows the proposed footway terminating on third party land.

The site access position is entirely based on the achievable visibility to the left; however, this is at the expense of highway safety when considering the proximity to other junctions on Yew Tree Lane. Providing the access, a suitable distance from other junctions along that route would however remove visibility to the left. Based on this, the proposed junction to deliver access to 48 residential properties would not be suitable at this location along Yew Tree Lane.

2. The submitted visibility assessment does not consider the carriageway width and existing features on Yew Tree Lane.

The width of Yew Tree Lane near the proposed junction can be measured at circa 4.6 metres. It is very likely that when waiting to exit, vehicles would wait back from the Give Way line in order to reduce the risk of collision with passing vehicles on Yew Tree Lane. Manual for Streets (MfS 1) in Figure 7.1 illustrates that a carriageway less than 4.8m could not accommodate 2 HGVs passing. Proximity to the Spring Lane junction will increase the propensity for HGVs meeting near to the site access, however, this would force vehicles to wait further back from the give way line to prevent collisions.

The proposed visibility splay to the left provides 2.4m x 40 metres can only be achieved at the junction if 20 metres of hedges and verge are removed. Information regarding the removal of highway hedges has not been detailed in the supporting material. Importantly, if the applicant is unable to remove the hedges away from the junction, then the visibility to left could be reduced to less than 20 metres. Nevertheless, should the hedge be entirely removed in this section, visibility to the left would still be potentially hindered by the boundary treatment to the south of the junction (*i.e. drivers having to look through a fence*). The application should determine how the boundary of the development site is to

be treated as visibility splay requires no impediment to driver sightlines looking left.

3. There has been no consideration in Transport Assessment for HGVs using the access point for deliveries and refuse collection.

Development proposals will result in a level of heavy goods vehicles accessing the site, however, based on the submitted material, it has not been demonstrated whether the proposed access arrangement could accommodate such vehicles.

Refuse vehicles will enter the site as a part of an existing route on Yew Tree Lane. Based on nearby authority standards, the refuse vehicles in Harrogate Borough Council could measure 2.6 x 11.2 metres. An initial assessment of the proposed access arrangement using AutoTrack indicates that a refuse vehicle would have to overrun a significant part of the opposing lane on entry. The following would be exacerbated by the width of Yew Tree Lane, where refuse vehicles would be forced in to the middle of the carriageway in order to undertake the turning manoeuvre.

Given the rise of online shopping, delivery vehicles are also likely to frequent the site in order to access to residential properties. Although typically smaller than a refuse vehicle, larger delivery vehicles can measure 10 metres in length. The turning manoeuvre would be broadly similar to the refuse vehicle and would require a large part of the entire carriageway to enter the site.

Based on the above, any vehicles waiting to exit the proposed junction would be struck by an HGV turning into the site and is a highway safety issue. The proposed junction should be widened in order to accommodate larger vehicles, especially given the width of Yew Tree Road. A swept path drawing should be provided in any instance to demonstrate the carriageway requirements for vehicles visiting the site.

4. The proposed access arrangements may require 3rd party land in order to tie in with the existing footway on Yew Tree Lane.

The northern footway is shown to tie in with the adjacent vehicle crossover by removing some of the existing hedge and fence line, found within the site ownership and highway boundary. However, there is a small area of land which falls outside both boundaries and if left as existing would prevent a 2-metre footway being provided in this location.

It has been determined that a suitable access point could not be provided on Yew Tree Lane in support of the proposals. The required geometry, spacing and visibility for an access in this location are unable to be provided without concerns over highway safety. This is a key planning consultation point and given a suitable access point to the proposed residential development has not been presented, then application cannot be supported from a highways and transportation perspective.

5. Widening of Spring Lane at the junction with Westminster Drive and the relationship to the existing sub-station

The applicant is proposing to widen Spring Lane around the existing junction with Westminster Drive. This will provide increased visibility by altering the alignment of the highway over a very short distance and potentially conflicting with the electric substation and its environs.

The electric substation was located away from the highway and it is highly likely that there may be equipment in the gap between the highway and the substation that may affect the viability or relocation of the highway as drawn. This should be confirmed prior to any decision being made as any future negotiation on this point should not be entertained.

6. Proposed increase in footway use and the proposed layout in relation to designing out crime

The proposed development will increase footfall in the area, there is limited natural surveillance due to the low number of local dwellings, the proposed layout does not offer any additional overlooking on Yew Tree Lane, however it does have the potential to increase the number of people walking close to hedged areas offering opportunity for people to stand out of view. This element does not appear to have been covered by the applicant.

7. The effect of additional street lighting on the designated special landscape area.

The proposed development has not considered the effect of street lighting on the special landscape area. This point needs detailed consideration prior to any decision being made. Even if street lights are turned off after midnight, this would offer limited benefit as people are unlikely to be moving around at that time (hence the reason it can be turned off) and during those times, people would not be looking to enjoy the aspects the special landscape area offers, whereas at dusk it would be spoilt due to the additional lighting necessary to deliver a safe scheme.

Summary

The proposed access has been assessed and it is clear that its location has not been determined through a valid design process, rather it is selected as it is the only place visibility requirements may be met, which given the surrounding constraints is not clear cut. This raises a number of issues as discussed above, however if through the detailed design process the junction requires even a slight move, then the visibility shown would be further compromised, combined with all of the other existing issues, could result in an undeliverable access arrangement at the detailed design stage.

There are a number of existing driveways, poor forward visibility on Yew Tree Lane, the effect of the gradient and the lack of clarity over the area under the applicants control, results in a lack of confidence that this is defensible access location. There is no evidence of a Road Safety Audit, this would raise the points discussed above as a minimum.

The junction works at Westminster Drive lacks the necessary detail for a confident decision to be made on its delivery.

The layout does not offer any improvement to natural surveillance, however it increases the potential number of people travelling by foot, which could encourage additional opportunities for crime to occur.

The effect of additional lighting necessary to address design requirements on the special landscaping area has not been demonstrated as being considered nor acceptable by the applicant.

It has not been demonstrated that the junction dimensions accommodate the vehicle types that will utilise the access in a safe manner. Ultimately it has not been demonstrated in the supporting material that "safe and suitable access to the site can be achieved for all uses" (NPPF, 2018, para. 108b) and therefore is considered to be contrary to policy and should be refused on this basis.

Yours sincerely,

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