## Rebuttal of 'Statement of Highway Impact’ by CORMAC Consultancy for Proposed Access onto Telegraph Road,

## St Mary’s.

### 2.2 Traffic Speeds

2.2.1 On Monday 20th January 2020 approximately 200 speed readings were taken between 10:45 and 11:52. In each direction the 85 th percentile speed was 29 mph . Full details of the observations are included at Appendix $A$.

Response:
The speed readings should have been undertaken within the AM or PM Peak Hour.
2.2.2 According to the local highways engineer, Eddie Williams, January is a quiet month, traffic-wise, and Monday is a quiet day. During the holiday season, the roads are considerably busier, particularly on changeover day.

Response:
Unfortunately hearsay is not an acceptable form of accurate assessment but apart from that, the level of traffic flow is not a consideration as an access is safe or unsafe and a more utilised access is actually safer than a low use access as passing drivers are aware of the access daily and its use. Conversely, driving past an access every day with no interaction with an exiting vehicle, on the day one does appear the passing driver is not expecting or anticipating it.
2.2.3 Even so, whilst a different time of year may have yielded more observations, the distribution of speeds would unlikely be significantly different. The geometry of the road evidently restrains speeds to a natural limit of 30-5mph.

Response:
Heavier flows of traffic do tend to travel slower as they are in 'convoy's' so it is incorrect they would be 'unlikely' to be different. The 200 speed readings in Appendix A clearly demonstrate that the 'natural limit' of speed is actually lower than 35 mph with only $\mathbf{1 7}$ out of $\mathbf{2 0 0}$ vehicles traveling at 30 mph or above and an $85^{\text {th }}$ percentile speed of below 30 mph .
2.2.7 That this access was to be of limited use is confirmed by Condition No 6, which reads as follows: "The access hereby approved shall only be used by commercial vehicles to off-load/load materials to and from the site and not for any other vehicles, including customers using the premises."

Response:
This is a totally unenforceable and unsound planning condition. It recognises that the use of the access by large slow moving vehicles is safe and suitable and yet attempts to restrict the type of user/driver rather than type or size of vehicle. If a 'commercial vehicle' enters to load would it not suggest that the driver of said vehicle was therefore a customer? As stated previously, an access is either safe or not and the frequency of use does not affect this. Clear evidence has been produced in the original Transportation Advisory Note that the existing access is woefully below standard and considered to be far less safe to use than the proposed access.

Unfortunately, the author of the Cormac report has failed to make any form of assessment of the existing access, comparison to the proposed and therefore has failed to assess the major highway safety improvement.
3.1.2 The proposed access is shown at the midpoint along the boundary, thus maximising the available visibility in each direction. Whilst the proposed opening of 5.5 m might, in theory, offer sufficient width for cars to enter and leave simultaneously and independently, the reality may be somewhat different.

Response:
The comment clearly acknowledges that the proposed access maximises the available visibility - Highway safety improvement.

The proposed 5.5 m wide access does provide more than sufficient width for two cars to pass and the reference to 'in theory' is questioned. New estate roads serving up to 10 dwellings may provide a 4.8 m wide access and 5.5 m may
serve up to 300 dwellings - CC 'Development Layout Design'. In 'reality' one assumes that the local highway authority is content that an access of 5.5 m is sufficient for two vehicles to pass with safety.
3.1.3 By maximising the available room on site, the end spaces - nos 4 and 7 on the application drawing (Fig. 3) - are barely $3 m$ from the edge of the road. The distance is too short for vehicles leaving these spaces (particularly in forward gear) to straighten up before they reach the road. Their angled exit onto the road could:
(a) require a three point turn within the carriageway, and
(b) cause vehicles entering the site to wait until the car park entrance is clear.

Response:
Drivers are permitted to undertake a 3 point turn within the carriageway if it is safe to do so but the event is highly unlikely to occur due to the additional width of aisle between the parking bays ie 7.6 m rather than the standard 6 m .

There is no danger to a vehicle waiting within the live carriageway where vehicle speeds are low, forward visibility within guidance and flows low - all of which apply to this site.
3.1.4 Either of these scenarios could be prejudicial to highway safety. Users of the A3111 can reasonably expect traffic to flow freely. So whilst these scenarios could describe typical everyday manoeuvres within a built-up area, they are not typical of a site that is on a main road, the edge of the town.

Response:
Given the above response, the initial sentence is incorrect and not defined by reason. Regular users of the A3111 cannot 'reasonably expect traffic to flow freely' as there are no parking restrictions and the original TAN clearly shows a parked vehicle interrupting the 'free flow. Whilst the road is an ' $A$ ' class road, it is a rural road within the urban edge of town and would certainly fall within Manual for Streets guidance and should not be considered a 'main' road in as such the A30 in Cornwall is.
3.1.5 An additional concern with the potential difficulty in using the car park is that it could encourage customers instead to park on the road; or half on the road, half on the footway.

Reason:
As stated above, there are no parking restrictions on the A3111, and vehicles do park. As to the assumption that some may wish to park on the footway, again this is an unqualified assumption and the photo in the TAN shows existing highway parking. As there is only an approximate total of 500 vehicles on the island (Census Data) and given the size of the business use, together with its sustainable location, the assumption of such large numbers of car borne customers is, again, unqualified.
4.2.4 Until such time as the whole of the splays can be included in the planning application, they should are disregarded. On that basis, using the same xdistance of $2.4 m$, the achievable $y$-distance amounts to only $9 m$ to the left and right (equivalent to half the width of the plot). The minimum distance of 43 m cannot be achieved until the driver's eye is at (or very close to) the edge of the road, by which time the vehicle is protruding into the carriageway by $2 m$ or more.

Reason:
The submitted drawing JG01 (extract overleaf) demonstrates the increased emerging visibility over the existing (previously approved) access. This is a major highway safety gain that does not appear to have been compared to the major issues re the existing access which will be permanently stopped up and have the additional benefit of a level exit for emerging drivers. It is understood, and clarified, that notice has been served on the adjacent landowners. Should the ownership change hands and any obstruction (ie fence) be erected over 1m adjacent to the highway, then planning consent would be required ergo the visibility splays are ensured.

4.2.5 True, oncoming motorists may well see a vehicle slowly emerging from the access, with enough time to slow down or pass around it. Indeed, many such accesses already exist, including the current access to the yard. Nevertheless, a new access should meet appropriate standards, and its safe operation should not be dependent on other motorists being able to take evasive action.

Response:
As accepted by the author the issue of emerging drivers is not a highway safety issue and whilst not verbatim to strict 'guidance' the proposed relocated access is a major highway safety gain.
4.2.6 In his Transport Advisory Note in support of the application, Jon Pearson asserts that the "closure of an existing, highly substandard access and replacement with much improved access is considered a major highway safety gain". This is disputed. Without the essential visibility splays, the level of improvement offered by the proposed access over the existing one is minimal.

Response:
The 'minimal' improvement should be considered against the Plates $3 \& 4$ of the improved access over the Plates 5 \& 6 in the submitted TAN. 'Minimal' is considered correct and 'major' would be more appropriate at this location.

## Summary

5.1.1 The free movement into the site is likely to be hindered by vehicles manoeuvring in and out of parking spaces immediately inside the site entrance. Unable to straighten up fully before leaving the site, vehicles may need to carry out a three point turn within the carriageway, or they may force other vehicles to wait in the road until the entrance is clear.

Response:
Incorrect. The extra aisle width enables any vehicle to reverse, turn and exit in the correct location.
5.1.2 Some customers could choose to park on the road rather than use the car park.

Response:
Whilst this issue is disputed, due to the level of vehicular ownership on the island in tandem with the size of retail unit, combined with the existing supermarket within the town (which has NO parking provision, the highway authority clearly have no issue re parked vehicles on the carriageway given the total absence of parking restrictions.
5.1.3 The proposed access is close to a sharp bend. Only after rounding the bend will westbound drivers be able to see the access, which may lead to sharp braking if they wish to enter the site.

## Response:

As agreed by the Cormac report and clarified within the submitted TAN, drivers have clear vision and ample to time to react 'From the northeast, motorists would approach the access around the aforementioned bend (now a LH bend). On rounding the bend, the proposed access is only about 45m ahead, which may cause some drivers entering the site to brake sharply. However, these occasions are likely to be few and far between, since the majority of motorists will be islanders who are familiar with the road layout.'. The sight stopping distance for 30 mph as per MfS is 43 m so 45 m is acceptable.
5.1.4 The visibility splays shown on the application drawing cross over land which is outside the control of the applicant. Accordingly adequate sight lines can neither be guaranteed nor made the subject of suitable planning conditions.

Response:
The submitted drawing JG01 disputes this assessment. Notice has been served on both adjacent landowners with no objection. Any construction above 1 m adjacent to the highway would require planning consent and therefore the new, improved emerging visibility, is a guaranteed.
5.1.5 When taking into account the dimensions of the site, the true sight lines measure only $9 m$ to the left and right of the proposed access.

Response:
Incorrect - see JG01.
5.1.6 Although the 85th percentile speed on Telegraph Road is less than 30 mph , the application has not provided sufficient evidence that a safe and satisfactory access can be provided. In the interests of highway safety it is recommended that the application be refused.

Response:
Incorrect - see responses above.
11th February 2020
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