



Proposed Access onto Telegraph Road, St Mary's

Statement of Highway Impact

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COUNCIL COMPANY

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1 INTRODUCTION

- 1.1.1 Cormac Solutions Ltd has been commissioned by the Council of the Isles of Scilly to assess the highway impact of a development proposal adjacent to Telegraph Road, St Mary's. The proposal (included in planning application number P/19/064/FUL) is to replace the existing access onto Telegraph Road with a new access and to construct a new parking area. Comprising 7 spaces for cars and three bicycle bays, the parking area would serve as a customer car park for a new/expanded retail unit.
- 1.1.2 The local authority's concerns primarily centre around the visibility distances which the site conditions appear to be restricted, and the somewhat cramped nature of the proposed car park. The officers fear that if the development goes ahead, it might create dangerous highway conditions. On the other hand, to refuse planning consent without demonstrable evidence of more dangerous highway conditions could result in having to defend the refusal at an appeal.
- 1.1.3 Against that background, the brief for Cormac Solutions Ltd is to provide independent highways advice, which the council can take into account before determining the application.

2 APPLICATION SITE

- 2.1.1 The A3111 Telegraph Road is one of two principal roads that connect Hugh Town with the rest of St Mary's (the other being the A3112). In the vicinity of the application site, about 700m east of the centre of Hugh Town (Fig. 1) its width varies between 4.8m and 5.4m. Centreline markings are sporadic.



Fig. 1 Location of Application Site

- 2.1.2 The only footway is on the northern side of the road, the opposite side from the application site. On the south side, where there is no verge or footway, vehicles leaving the site emerge directly onto the carriageway (Fig. 2).

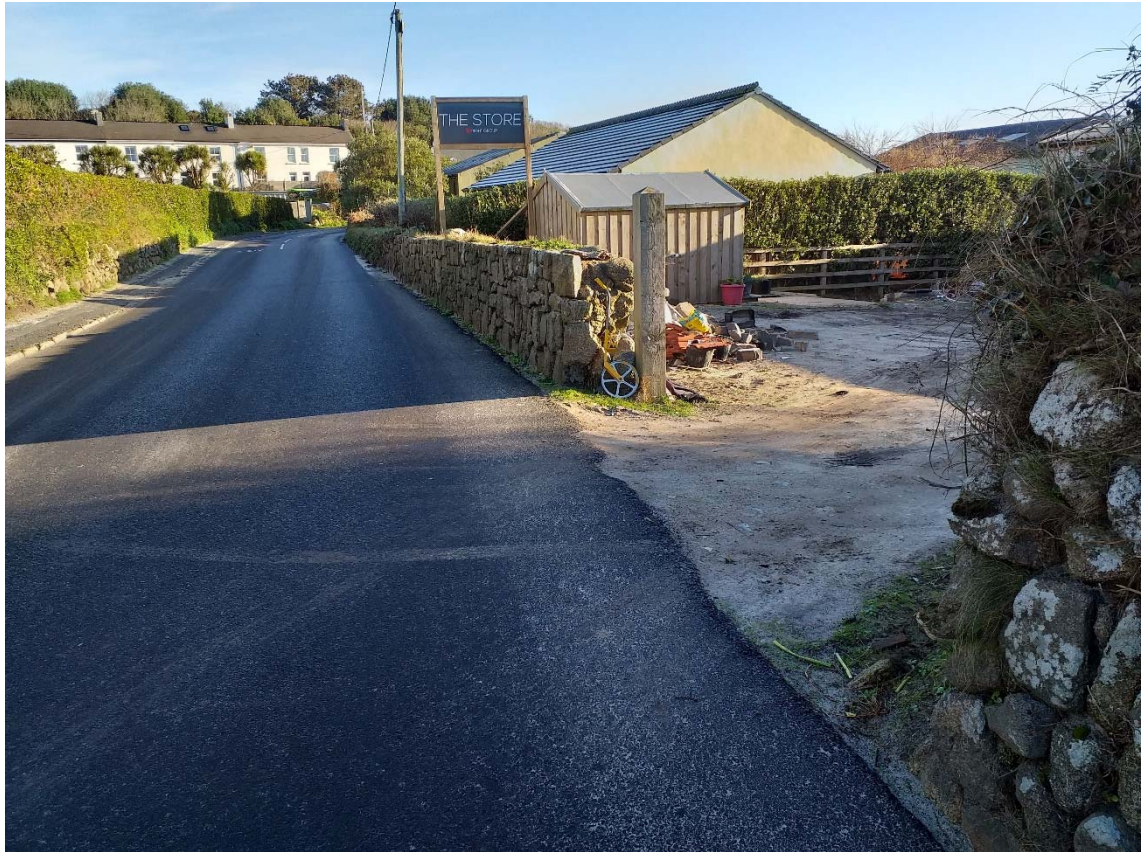


Fig. 2 Existing Site Access Onto Telegraph Road

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 85th percentile speed was 29mph. Full details of the observations are included at Appendix A.
- 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.
- 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 30-35mph.
- 2.2.4 **Existing Access onto Telegraph Road (Post-2014)**
- 2.2.5 With regard to Scillonia Building Supplies (SBS) the site entrance onto Telegraph Road is not the main access. Primary access to the premises is currently via Porthmellon Industrial Estate. The road regularly experiences congestion, since some of the commercial units have only small forecourts and lack adequate off-street parking. Owing to the combined effects of parked vehicles, deliveries and fork-lift operations, access to and SBS at times is no doubt difficult and frustrating for staff and customers.

- 2.2.6 In 2014 the owner of SBS, Mr Mark Wright, obtained planning permission for a new access at the rear of the premises, i.e. off Telegraph Road (planning reference number P/14/032/FUL). The new access would be used for deliveries only, thus reducing congestion in the industrial estate and freeing up an area of forecourt at the front for customer parking.
- 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.”**
- 2.2.8 The existing entrance provides access to a rear yard which comprises approximately 170m² of unsurfaced but usable area. After an initial drop of about 0.3m from the highway, the ground continues to fall gently away from the road.
- 2.2.9 The boundary with Telegraph Road is about 18m long. It is demarcated with a random rubble wall, approximately 1.2m high, and a 4.5m wide gateway in the south-western corner of the site which provides access to the yard from the road.

3 PROPOSED LAYOUT

- 3.1.1 The proposed layout of the yard, included at Appendix B, shows 7 parking spaces, divided into two rows. Their dimensions of 4.8m x 2.4m comply with design guidance, and at 7.6m the width of the aisle between the two rows provides adequate manoeuvring room.
- 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 5.5m might, in theory, offer sufficient width for cars to enter and leave simultaneously and independently, the reality may be somewhat different.
- 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 3m 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.
- 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.
- 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.

4 VISIBILITY

4.1 Forward Visibility on Telegraph Road

- 4.1.1 For motorists approaching from the southwest and wishing to turn right into the gateway, the road alignment ahead provides about 65m of forward visibility, beyond which it disappears around a sharp RH bend. Generally, the approach speeds of oncoming vehicles are low enough to allow time for right turning vehicles to complete their manoeuvre in safety.
- 4.1.2 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.

4.2 Visibility When Emerging from the Access

- 4.2.1 The visibility splays on the applicant's drawing show x- and y-distances of 2.4m and 43m respectively, which correspond with the minimum standards of stopping sight distance in the Manual for Streets (par. 7.7.10 and Table 7/1). However, neither visibility splay is achievable, in that it encroaches on land that is outside the control of the applicant. Both to the left and to the right of the proposed access, the sight line crosses neighbouring land; and in the case of the sight line to the left, it actually appears to cut through the corner of a building.
- 4.2.2 Granted, inaccurate Ordnance Survey mapping could account for the building appearing to obstruct visibility. So at the very least, an accurate local survey would be needed to confirm the true position of the building. Notwithstanding that, the underlying issues are that
- (1) the visibility splays are largely outside the control of the applicant, and
 - (2) the planning authority is not able to grant consent with visibility-related conditions which can be enforced.
- 4.2.3 In the Design and Access Statement, the applicant's agent Mike Bradbury points out that 'the immediate neighbours are aware of the proposals, and [the applicant] is not aware of any opposition.' That may be true at the present time, but it cannot be secured indefinitely. New neighbours can move in, and existing neighbours can change their mind.
- 4.2.4 Until such time as the whole of the splays can be included in the planning application, they should be disregarded. On that basis, using the same x-distance of 2.4m, the achievable y-distance amounts to only 9m to the left and right (equivalent to half the width of the plot). The minimum distance of 43m 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 2m or more.

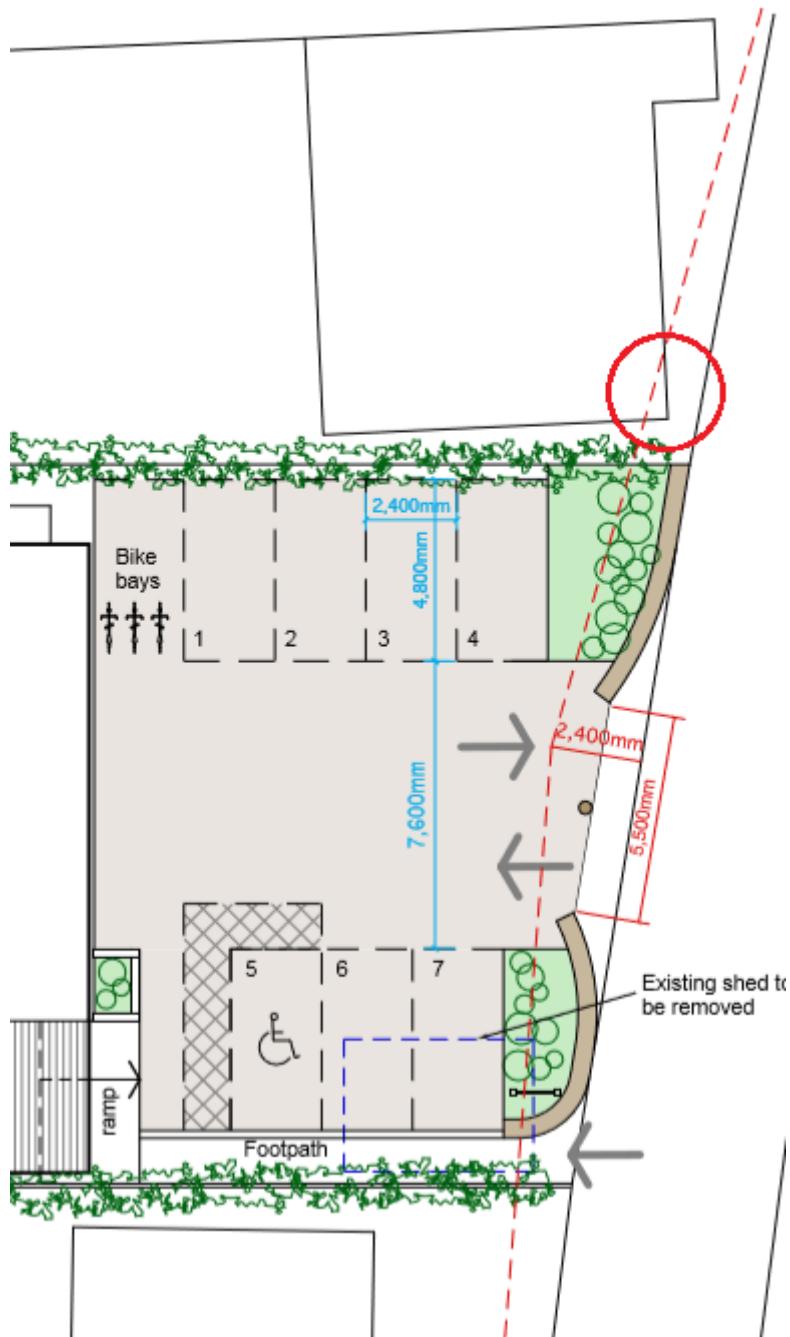


Fig. 3 Extract from Applicant's Drawing 1977-P08 rev. D (Visibility Splay Highlighted)

- 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.
- 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.

5 SUMMARY AND CONCLUSIONS

- 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.
- 5.1.2 Some customers could choose to park on the road rather than use the car park.
- 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.
- 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.
- 5.1.5 When taking into account the dimensions of the site, the true sight lines measure only 9m to the left and right of the proposed access.
- 5.1.6 Although the 85th percentile speed on Telegraph Road is less than 30mph, 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.

APPENDIX A – ON-SITE SPEED OBSERVATIONS

Observation	Eastbound	Westbound	Time of day	Comments
1	26		10:45	
2	30		10:45	
3		26	10:46	
4	19		10:47	
5	20		10:47	
6	25		10:48	
7		26	10:49	
8	29		10:49	
9		31	10:50	
10		23	10:53	
11		25	10:55	
12	18		10:55	
13		20	10:55	
14		21	10:55	
15		22	10:56	
16		19	10:56	
17	26		10:57	
18		23	10:58	
19		28	10:58	
20	30		10:59	
21	26		10:59	
22		25	10:59	
23		21	11:00	
24		20	11:00	
25		18	11:02	
26		24	11:03	
27	17		11:04	
28	33		11:05	
29	22		11:07	
30		27	11:07	
31	28		11:07	
32	25		11:08	
33	24		11:08	
34	32		11:10	
35	30		11:10	
36		18	11:10	
37		24	11:10	
38		22	11:11	
39	22		11:12	
40	26		11:12	
41	11		11:16	
42	20		11:17	

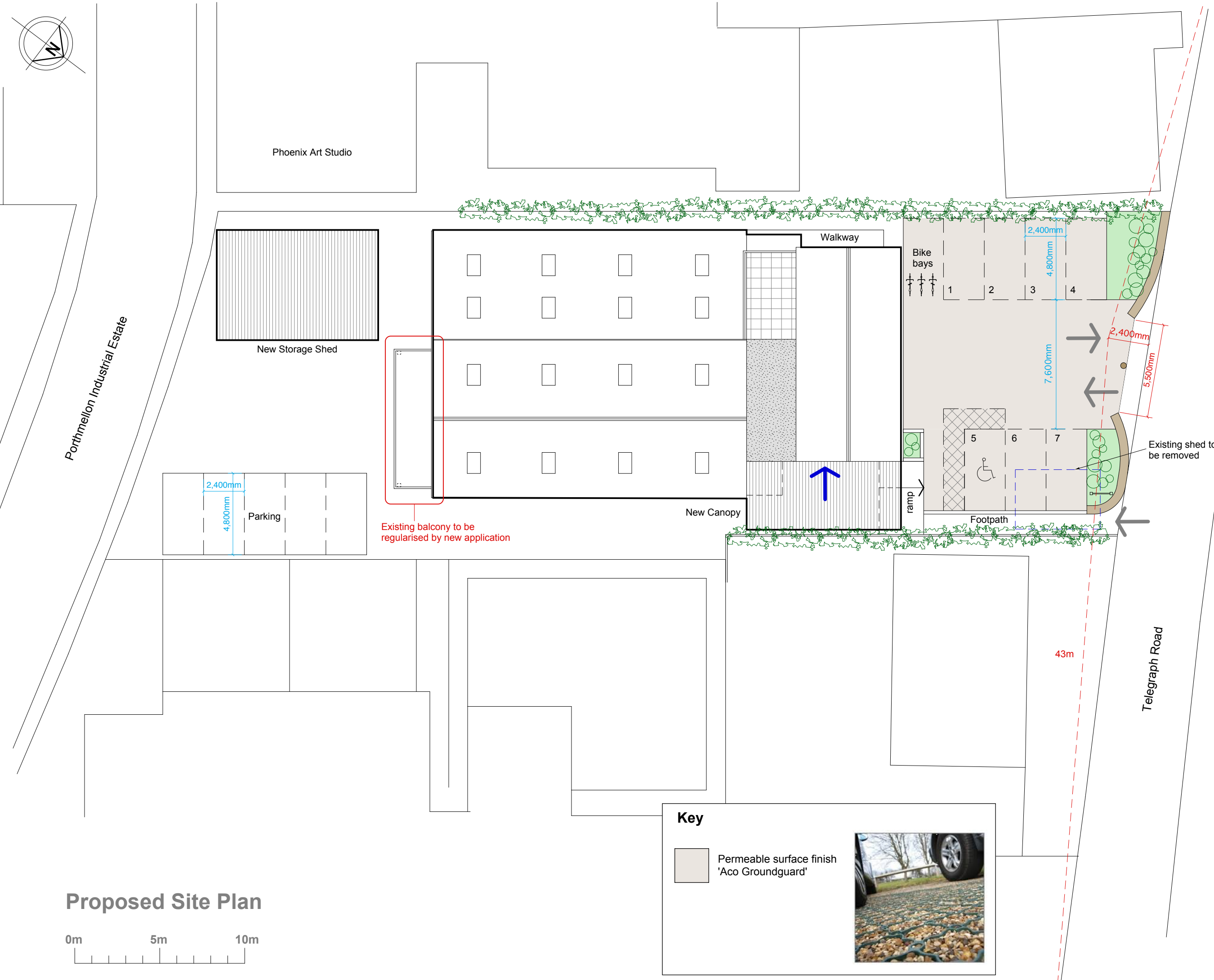
Observation	Eastbound	Westbound	Time of day	Comments
43		27	11:18	
44		25	11:18	
45		19	11:19	
46		23	11:20	
47	28		11:20	
48	26		11:20	
49		13	11:21	golf caddy
50	24		11:21	
51		31	11:22	
52		23	11:22	
53		26	11:23	
54	21		11:23	
55		19	11:24	
56	26		11:26	
57	27		11:26	
58	27		11:28	
59	23		11:29	
60		28	11:29	
61	23		11:30	
62	19		11:30	
63		20	11:30	
64	20		11:30	
65		28	11:31	
66		26	11:35	
67	16		11:35	
68	26		11:36	
69		27	11:36	
70	18		11:36	
71	25		11:37	
72	26		11:37	
73		25	11:38	
74	29		11:39	
75		28	11:39	
76	12		11:39	golf caddy
77	14		11:39	following golf caddy
78		20	11:40	
79		24	11:41	
80		28	11:42	
81		24	11:42	
82	27		11:42	
83		21	11:43	
84		25	11:44	
85		29	11:44	

Observation	Eastbound	Westbound	Time of day	Comments
86		26	11:45	
87	23		11:46	
88	25		11:46	
89	25		11:46	
90		25	11:46	
91	25		11:48	
92		20	11:48	
93		20	11:48	
94		25	11:48	
95		6	11:50	following mobility scooter
96		26	11:51	
97		22	11:54	
98	23		11:54	
99		26	11:55	
100	25		11:57	
101		27	11:58	
102		23	11:58	
103	30		11:58	
104		24	11:58	
105		27	11:09	
106		26	11:09	
107	13		11:59	
108		31	11:59	
109	25		12:00	
110		24	12:01	
111		26	12:01	
112		30	12:01	
113	19		12:01	
114	20		12:01	
115		19	12:01	
116	16		12:02	tractor
117	18		12:03	
118		14	12:03	
119	26		12:03	
120	28		12:03	
121	25		12:04	
122		29	12:04	
123	23		12:04	
124		25	12:05	
125		23	12:06	
126		15	12:06	golf caddy
127	27		12:07	
128	26		12:07	

Observation	Eastbound	Westbound	Time of day	Comments
129		26	12:08	
130	29		12:10	
131	28		12:10	
132		25	12:10	
133	20		12:10	
134		29	12:10	
135		27	12:11	
136	20		12:11	
137		21	12:11	
138	23		12:12	
139		24	12:12	
140	19		12:12	
141	34		12:13	
142	28		12:13	
143	28		12:13	
144		24	12:13	
145	22		12:14	
146		29	12:15	
147	20		12:15	
148		27	12:16	
149	19		12:16	
150		29	12:16	
151		28	12:16	
152		26	12:17	
153		28	12:17	
154	26		12:18	
155	32		12:18	
156		29	12:18	
157		30	12:20	
158	25		12:20	
159		26	12:20	
160		26	12:20	
161		34	12:21	
162	31		12:24	
163	28		12:00	
164	32		00:00	
165	24		12:25	
166	16		12:25	
167	13		12:26	golf caddy
168	25		12:26	
169	29		12:27	
170	29		12:28	
171		13	12:28	

Observation	Eastbound	Westbound	Time of day	Comments
172	19		12:29	
173	26		12:29	
174	20		12:29	
175	25		12:30	
176		29	12:31	
177		29	12:32	
178	29		12:32	
179	17		12:34	
180	29		12:34	
181		28	12:35	
182	25		12:36	
183	17		12:36	
184	30		12:37	
185	25		12:37	
186		23	12:41	
187	19		12:42	
188		22	12:42	golf caddy
189	29		12:43	
190		29	12:43	
191		26	12:43	
192		30	12:44	
193		22	12:48	
194		26	12:49	
195	26		12:50	
196	31		12:51	
197		26	12:51	
198	28		12:52	
199		32	12:52	
200	16		12:52	
201	22		12:52	
202		23	12:52	
Total obs	103	99		
85%-ile	29.0 mph	29.0 mph		

APPENDIX B – APPLICATION DRAWING NO 1977-P08 REV. D



NOTES

1

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2

DO NOT SCALE OFF THIS DRAWING

3

ALL DIMENSIONS AND LEVELS ARE TO BE CHECKED ON SITE BY THE CONTRACTOR BEFORE COMMENCEMENT OF WORK AND ANY DISCREPANCIES REPORTED TO THE ARCHITECT

4

NO RESPONSIBILITY CAN BE ACCEPTED FOR ERRORS ARISING ON SITE DUE TO UNAUTHORISED VARIATIONS FROM THE ARCHITECTS DRAWINGS.

AMENDMENTS

A

Alterations to parking access, pedestrian access and visibility splays. AKB 161019

B

Scale bar added. Disabled parking bay introduced. Parking space dimensions added and surface finish key. AKB 271119

C


Steps added from parking area to entrance MB 281119

D


Parking spaces reduced and reconfigured. Bicycle parking introduced. AKB 041219

PLANNING

Studio St Ives
4 Gabriel Street
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TR26 2LU
01736 798427



MIKE BRADBURY
DESIGN



JOB

Alterations to Scillonias Building Supplies, St Mary's, The Isles of Scilly

for
Wright Construction

TITLE

Proposed Site Plan

DRNG. NO.

1977-P08

REVISION

D

SCALE

1:100@A1
1:200@A3


DATE

Sept 2019

OFFICE USE / PRE-ISSUE

Proposed Site Plan

Key



Permeable surface finish 'Aco Groundguard'

