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FAO Mr David Smith – Planning Inspector

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21 May 2018

Dear Sir,

**Town and Country Planning (Local Planning) (England) Regulations 2012,
Regulation 24, Examination of Travellers' Sites Development Plan Document,**

**Proposed allocation of site to the west of the A49/A44 Worcester Road
Roundabout, Leominster, Herefordshire**

We have been notified by Herefordshire Council of the above referenced Examination in Public (EiP); please consider this to be Highways England's representation.

Highways England is responsible for the operation and maintenance of the strategic road network (SRN) in England. The network includes all major motorways and trunk roads. The SRN in the vicinity of the proposed site allocation is the A49 trunk road.

Background

Herefordshire Council has consulted Highways England in three consultations leading up to the current EiP:

- Issues and Options – Aug/Oct 2014
- Preferred Options – July/Sept 2016
- Pre-Submission Draft – Nov 2017

Highways England has provided advice on those sites in the vicinity of the A49/A44 Worcester Road Roundabout at Leominster that Herefordshire Council were considering for the purpose of a Transit Travellers Site. Following wider technical assessment on all of the sites, Herefordshire Council identified that their preferred option, in this locality, was the site to the west of the A49/A44 Worcester Road Roundabout.

Site Context

The eastern boundary of the site lies immediately adjacent to the A49 trunk road boundary with its existing point of access being located on the A49, 50 metres to the north of the A49 / Worcester Road roundabout and 15 metres to the south of an existing Toucan crossing point. The A49 is subject to a 60mph speed limit at this location. It is agreed that the existing access is agricultural in nature but benefits from a wide entry, and a long set back from the road that would allow vehicles room to pull off the carriageway.

Current Position

At this stage of the DPD process we can confirm:

1. That in our view the plan has been prepared in accordance with the relevant regulations; and
2. That the allocation of this specific site by the Council was an appropriate policy choice for the Council to have made based on the evidence available at the time of the plan's development.

Highways England has consistently expressed safety risk concerns, discussion of which is fully set out in the annex to this letter, about the use of the site to the west of the A49/A44 Worcester Road Roundabout with the current proposed access arrangements.

Highways England requested that to assist in the evaluation of the potential for the site in coming forward, that a Safety Risk Assessment be undertaken to consider the suitability for the existing point of access to the site which presently comprises a field access onto the A49. Guidance for such an assessment is contained in the Design Manual for Roads and Bridges (DMRB) Vol 0, Sec 2, Part 3 – GD 04/12. The detail of this assessment, its interim findings and subsequent further assessments is summarised in the annex.

Next Steps

At this stage, Highways England cannot fully conclude that the proposed allocation of land west of the A49/A44 Worcester Road Roundabout with the currently proposed access arrangements is achievable. Alternative access arrangements and the findings of the Safety Risk Assessment work currently underway may in due course negate this concern.

Constructive work has been undertaken by Herefordshire Council to determine the significance of the highways impacts and the potential scope of mitigation which could potentially make the development acceptable in planning terms through the planning application process.

Highways England will continue to work closely with Herefordshire Council to conclude the GD04/12 Safety Risk Assessment report for the site to the west of the A49/A44

Worcester Road Roundabout for use as a Transit Travellers Site. In the event, that this site is allocated then it could be expected that this work would inform any recommendation by Highways England in relation to any future planning application for this site.

We ask that you consider this late submission due to its direct relevance to your consideration of the DPD. Highways England intends to rely on these written submissions for the purpose of the Examination in Public and does not intend to participate in the hearing. Please do not hesitate to contact me if you require any more information or clarification.

Yours sincerely

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Cc: Angela Newey/Kevin Singleton – Herefordshire CC
James Carroll - Kier

Annex 1 – Safety Assessment

Balfour Beatty provided a Safety Risk Assessment Scoping Note for the proposed Travellers Site to Highways England on 12 December 2017 to address the requirements for a GD04/12 Safety Risk Assessment. Highways England responded to the scoping note and Balfour Beatty provided a full GD04/12 Safety Risk Assessment for review on 15 February 2018.

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Conformity to Policy

The relevant starting point for the consideration of potential development impacts on the SRN is *DfT Circular 02/2013: Strategic road network and the delivery of sustainable development (the Circular)* this should be read in conjunction with: *The strategic road network: Planning for the future. A guide to working with Highways England on planning matters.*

This policy and guidance sets out that Highways England will engage with authorities in the preparation of development plans so that development “*is planned in a manner which will not compromise the fulfilment of the primary purpose of the SRN*” (paragraph 14 of the Circular).

In terms of any individual proposals this includes the consideration of whether proposals are likely to be capable of being accommodated within the affected link or junction. The principles related to any Environmental or Physical impacts of development on the SRN are further outline within the Circular.

Safety Risk Assessment

The GD04/12 Safety Risk Assessment methodology adopted is the standard for Safety Risk Assessment for the SRN and has been undertaken to assess risks associated with the proposed use of the site. Under the DMRB, this assessment is subject to a formal approval process by Highways England.

The assessment identifies potential hazards associated with the highway including the implications for different road users, particularly vulnerable users such as children at the site. The hazards identified within the assessment comprise:

- Increased localised movements impacting traffic flow close to the roundabout
- Safe access and egress to the site
- Safe use of the pedestrian crossing

- Vulnerable users next to SRN (eg children at the site)
- Potential for animals to stray onto SRN eg. horses/dogs
- Distraction of site use to road users

These risks have been considered in turn and a number of risks have been identified to require mitigation in order to address concerns arising from the assessment.

With regard to intensification of traffic from the site, the baseline traffic conditions and forecast traffic associated with the proposed use have been agreed and are recorded within the Safety Risk Assessment. The present traffic baseline estimates demonstrate that there is only infrequent use of the site access (no more than 20 times a year) however the proposed use, which may see up to 68 vehicles a day during summer months, is still a relatively low volume of traffic movements for a trunk road access.

The suitability of the existing access to accommodate the higher levels of traffic flow has been considered in accordance with DMRB TD 41/95, in particular this has considered the suitability of the identified setback and visibility requirements for the junction. This demonstrates that visibility from the access point is restricted by the location of an existing road sign on the A49. While it is anticipated that this sign would require relocation to enable the junction to operate safely, Highways England has in principle no objections to the relocation of the sign. This would however need to be considered fully as part of more detailed design measures at the appropriate point in time.

Matters of site fencing and security have been identified to be important to the protection of vulnerable users and prevention of animals straying onto the A49. The detail of these measures are agreed to be appropriate for consideration at the point any planning application is made but do not need to be considered at this time.

The assessment currently concludes that, following a quantification of any residual risks associated with collisions on the A49 that it will be necessary for minor improvements to be made to the A49 in mitigation. These are necessary to improve visibility of the access and should be accompanied by a Traffic Management Plan, intended to reduce the number of turning movements into the site. The proviso of adequate site fencing is also required, however no other measures of control have been identified as being necessary at this time.

Safety Risk Assessment – Outstanding Matters

The comments below are based on a review of the GD04/12 Safety Risk Assessment provided by Balfour Beatty on 15 February 2018. The comments from this review were provided to Balfour Beatty and Herefordshire Council on 16 May 2018. The purpose of providing these comments is to allow Herefordshire Council to further develop the GD04/12 Safety Risk Assessment and reconsider the conclusions, however it is understood that this can occur beyond the timescale for the Examination in Public (EiP).

Highways England's main concerns that have arisen from this review are related to safety, visibility and non-compliance with the Design Manual for Roads and Bridges (DMRB) TD 42/95 with regard to the existing local road joining the A49.

On the whole the assessment provided by Balfour Beatty, on behalf of the Herefordshire Council, does appear to be in line with GD04/12 standards in terms of approach. However, three points were raised by an independent reviewer from Highways England's Safety & Engineering Standards (SES) Division.

The first issue is in regard to there being no clear reference to the speed limit. There is currently no speed limit signage along this section of the A49, but after further research the speed limit was found to be 60mph. It is considered that this should be made clearer within the report.

The second issue regards site access and egress. There is discussion of other X and Y distances for sightlines on minor to major junctions, with reference made in close alignment with the requirements of TD 42/95. However, it seems that some of the other relevant elements of the same standard have not been analysed in the same way, an example being when the report states that 'the site benefits from a wide entry...', with no further information provided to what that means and how it relates to TD42/95 standards, and any issues that may arise as a result. Justification of the decision to not alter the access must be given in accordance to DMRB TD 41/95 Paragraph 2.8 (Mandatory Section) New or Altered Direct Accesses:

"The geometric layout of new and altered direct vehicular accesses on to existing all-purpose trunk roads shall be determined in TD 9 (DMRB 6.1.1) and the size of vehicles using the access. The access shall be designed for the largest vehicle expected to use it. The selection access layout will be dependent upon carriageway widths, geometric constraints, local traffic flows, other site specific features, and environmental considerations."

Finally there is no information on the impact for those entering the site and other road users approaching from the roundabout in terms of visibility of the oncoming traffic and pedestrian crossing. It is assumed that the crossing is in a place compliant with standards, but the road and time to react to vehicles preparing to enter the site have been reduced. The correct Visibility distance is a mandatory requirement as set out in DMRB TD 9/93, both the forward and backwards visibility for a 60 mph carriageway should be 215m. Whilst Herefordshire are not altering visibility from the roundabout or intending to alter the existing field access, this point is important due to the intended change of use of the access and the consideration of the resultant design must align with DMRB TD 41/95 Paragraph 2.10 (Mandatory Section):

"Any application which results in a material increase in the volume of traffic or a material change in the type of traffic entering or leaving a trunk road shall be carefully considered. Generally, a material increase is considered to be if the turning traffic flows, as a result of the new development, would increase by 5% or more, although there may be cases when it is important to consider smaller increases. For England, this is discussed more fully in Annex B of Planning Policy Guidance Note 13 (1994), and for Wales in Appendix A of Planning Policy Guidance Note 13 (1988)."

Therefore further analysis of the issues stated above is required within the GD04/12 Safety Risk Assessment report, with reference made to the likelihood of vehicles reaching 60mph just after the roundabout, potential for conflict with slow moving vehicles wishing to enter the site etc. and a comparison made with the existing use of the field access in order to qualify/quantify the risk and the acceptability (or otherwise) of this proposed allocation.