

Comments on Technical Note - Technical Review of the Traffic and Highways aspects of a planning application (DC/16/3381/FUL)

Introduction

This paper comments on key paragraphs of the Technical Review.

Vehicle Access

Para 3.2.4 The creation of a new 7.0m width vehicular access/egress onto Victoria Street, will enable safe, two-way vehicle movements.

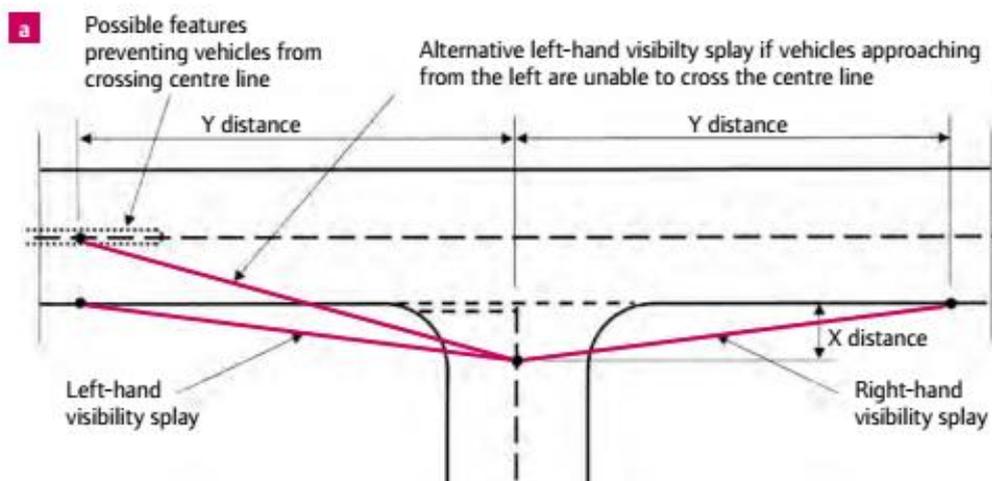
Comment:

1. **This is a highly contentious and misleading statement which is not supported by the facts**, as illustrated below.

Para 3.2.5 The provision of 900mm boundary walls on the site Victoria Street frontage will provide drivers egressing the car park with visibility splays of a minimum 2m x 43m, in accordance with Table 7.1 of Manual for Streets. As the photographs in Figs 3.1 and 3.2 below demonstrate, drivers egressing from the proposed car park entrance will be able to see approaching vehicles on Victoria Street from both north and south directions.

Comments:

1. The 2 m x 43 m **visibility splays are not in accordance with the minimum specified in Manual of Streets (MfS)**. The minimum is 2.4 m x 86 m - see diagram (MfS 7.18 a) and comments below.



2. Table 7.1 specifies a stopping sight distance of **43 m** at 30mph. This is **the Y distance, which must be available unobstructed in both directions. It is not**, it is approximately 30 m to the left and right (in the most favourable circumstances).
3. However, **visibility to the right can be easily and dangerously**

obstructed by people/objects in the front garden of Nos. 71/73/75, **which would reduce the visibility splay length to 5 m.**

4. As far as the X distance is concerned, the following extract from the MfS is relevant:

7.7.6 An X distance of 2.4 m should normally be used in most built-up situations, as this represents a reasonable maximum distance between the front of the car and the driver's eye.

7.7.7 A minimum figure of 2 m may be considered in some very lightly-trafficked and slow-speed situations, but using this value will mean that the front of some vehicles will protrude slightly into the running carriageway of the major arm. The ability of drivers and cyclists to see this overhang from a reasonable distance, and to manoeuvre around it without undue difficulty, should be considered.

5. The traffic data indicates that the access for the main entrance to the Swan will be neither a very lightly-trafficked (see Traffic Generation below) nor slow-speed (see Traffic Survey Data below), so **the set-back or X distance should be 2.4 m and not 2.0 m as specified. This increase in set back would further reduce the visibility splays, to 10 m on the right.**
6. **Bushes planted behind the 900mm boundary walls to landscape the car park,** as now proposed, **will further reduce visibility** on exit.
7. **The photographs (Figs 3.1 and 3.2) are very misleading** - they are taken from a point in front of the building line from No 71, with a set back of approximately 1.0 m, less than half the appropriate standard.

Accidents

3.3.2 Analysis of the 'Crashmap' PIA data reveals that:

- *no PIAs were recorded within Market Place adjacent to the existing Swan Hotel 'carriage arch' car park access/egress within the 5 year period 2011 - 2015*
- *no PIAs were recorded within Victoria Street between East Green and Trinity Street (i.e. adjacent to the proposed Swan Hotel car park access/egress) within the 5 year period 2011 - 2015*

Comment:

1. This statement is true, as far as it goes. However, **it does not reveal** that the same "Crashmap" personal injury accident (PIA) data shows **an accident in 2015 at the junction of Victoria St with the north-west corner of East Green.**
2. This is approximately **100 m from the proposed access** and on the direct access route, already obstructed by HGV and fork lift trucks servicing the Brewery at the south-east corner of East Green.

3. **It does not consider non-PIA incidents.** Cllr. Sue Allen (No. 89) reports:

"There have been accidents in Victoria St although not reported to police as they do not involve people/cars.

We have had our fence demolished twice within 14 months and the second time it took the wall next door as well. Nos 87 and 89."

Para 3.3.3 Analysis of the aforementioned PIA information suggests that there are no highway safety issues associated with the current operation of Victoria Street and other Southwold streets within the immediate vicinity of the Application Site. Moreover, there appear to be no highway safety issues to preclude the provision of a car park access/egress for the Swan Hotel, onto Victoria Street.

Comment:

1. **This is a highly contentious and misleading statement which is not supported by the facts,** as illustrated above.
2. **It is difficult to understand why a PIA within a 100 m is not considered to be within the "immediate vicinity" and so worth mentioning.**
3. **It takes no account of the certain, substantial increase in traffic volume** discussed below.

Traffic Generation

Para 3.4.2 To provide an indication of the likely traffic flows associated with a reduction in four bedrooms within the Swan Hotel curtilage, comparable data from the latest version of the TRICS trip generation database (the nationally recognised trip information database) has been utilised to evaluate the potential trip generation of:

- *the Swan Hotel's existing 42 bedrooms and*
- *the Swan Hotel's proposed 35 bedroom development.*

Comment:

1. The purpose of the traffic generation data may be intended to show the reduction in traffic resulting from the refurbishment of the Swan but its **real value is to show the predicted increase in Victoria St traffic.**

Para 3.4.5 The TRICS 7.3.3 forecast for the potential number of vehicle trips that may be generated by a 35 bedroom hotel has been summarised within Table 3.2 below. [Simplified for convenience.]

	AM Peak (08.00 – 09.00)	PM Peak (17.00 – 18.00)	Daily – 18 hours (07.00 – 24.00)

	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
No. vehicle trips	5	10	5	3	64	64
Total trips	15		8		128	

Comments:

1. This shows that the annual average daily traffic in **Victoria St is forecast to increase by 128 vehicle movements**. Clearly it will be much higher during Summer holidays and less during the winter.
2. **It does not show any forecast for vehicle movements between midnight and 07.00 am.**

Para 3.4.9 Although the forecast reduction in Swan Hotel generated vehicle trips (Table 3.3 above) is not huge, the TRICS data does suggest that the removal of 7 no. guest bedrooms and the provision of a new car park is unlikely to have any noticeable peak period impact upon the operation of the local Southwold highway network.

Comments:

1. There is **no consideration of the considerable impact 128 extra trips will have on Victoria St.**
2. The peak periods used are not relevant to Southwold as shown below.

Traffic Survey Data

Para 3.5.1 Automatic Traffic Counters (ATCs) were installed in Southwold in October 2016, to record existing traffic flows at the following locations:

- *on Victoria Street, near to the existing Swan Hotel access gate;*
- *on the existing Swan Hotel car park access road, beneath the 'carriage arch'.*

Comments:

1. **An ATC was not installed in the Brewery yard** by the barrier with the existing Swan car park, therefore **there is no record of 4x4s or other cars that**, Karen Hester, the Chief Operating Officer says, **use the Brewery yard for convenience** and in preference to the 'carriage arch'.
2. As a result **the 'carriage arch' numbers will understate**, perhaps substantially (given the popularity of this type of vehicle), **the total traffic volume forced to use the new access and Victoria St.**

Para 3.5.2 The ATC data was recorded over a 2 week period, from Friday 14th October – Friday 28th October 2016, to provide a comparison of Southwold traffic during schools 'Term Time' and 'Half Term' periods:

- *Friday 14th – Thursday 20th October : 'Term Time' traffic*
- *Friday 21st October – Friday 28th October : 'Half Term' traffic.*

Comments:

1. It is **unclear to what extent data collected at the end of October is relevant as a proxy for peak Summer holiday season traffic**, when vehicle and pedestrian numbers are much greater.
2. The detailed ATC records are numbingly numerous but suggest **an 85 percentile speed typically of 20-25 mph for Victoria St and 4-5 mph for the 'carriage archway'**.

Paras 3.5.3 – 3.5.4

Term time and half-term ATC data records are summarised in the following [simplified] table:

Timing	08.00 – 09.00	17.00 – 18.00	06.00 – 00.00
	Term time		
Swan archway - in and out	3	4	85
Victoria Street – both ways	9	10	193
	Half-term		
Swan archway - in and out	3	6	104
Victoria Street – both ways	10	20	278

Comments:

1. The choice of time periods is strange because neither the morning nor afternoon intervals are peak periods for Southwold.
2. **The period between 09.00 and 17.00 is much busier.**

Para 3.5.7 Analysis of the ATC data suggests that the provision of a new car park entrance on Victoria Street is unlikely to have any measurable impact on traffic flows on the Southwold local highway network during the AM and PM peak periods.

Comments:

1. It is not surprising that there is no measurable impact on traffic flows on the Southwold local highway network during the AM and PM peak periods since:
 - **08.00-09.00 and 17.00-18.00 are not peak periods** for the Swan entrance or Victoria St.
 - traffic flow will only be displaced within the network.
2. However, it is surprising that **the increase in Victoria St traffic of at least 40% on average is not mentioned:**
 - term time increase $85/193 = 44\%$
 - half-term increase $104/278 = 37\%$.
3. **This could be substantially greater if 4x4s and other cars to be**

precluded from use of the Brewery yard entrance are included.

Conclusions

Para 4.2.3 Analysis of available data and a site visit suggests that a new Swan Hotel car park access/egress onto Victoria Street may be safely provided, in accordance with the design guidance provided within Manual for Streets.

Para 4.2.4 Analysis of recently recorded ATC data, and a comparison with data from the latest version of the TRICS trip generation database suggests that the rationalisation of car parking within the Swan Hotel curtilage and the associated reduction in the number of guest bedrooms from the current 42 rooms to the proposed 35 rooms, is likely to generate no measurable impact on the local Southwold highway network.

Comments:

1. The Technical Review of the Traffic and Highways prepared for Adnams in support of planning application DC/16/3381/FUL is deeply flawed.
2. The omission and selective use of data and its heavily slanted presentation is thoroughly unprofessional and a dis-credit to Adnams.
3. It miss-states, deliberately or otherwise, the standard Manual for Streets dimensions for visibility splays for vehicle access.
4. It fails to consider the impact of landscaping proposals on visibility.
5. It fails to mention a recent (2015) personal injury accident within a 100 m of the proposed access, or other even closer accidents that resulted in property damage.
6. It focusses on nugatory benefits arising from a reduction in Swan bedrooms and fails to consider the material impact on Victoria St. of:
 - a minimum average forecast increase in traffic of 128 (40%)
 - the additional impact of 4x4s and other cars that currently use the Brewery yard for access
 - how the "term time" and "half-term" data collected might relate to peak Summer holiday traffic.
7. Nothing in the Technical Note alters residents' views that the proposed Swan access in Victoria St is sub-standard or that it will generate significant additional traffic in Victoria St.
8. Therefore it will increase to an unacceptable level the dangers to residents, road users and pedestrians and so should not be permitted.