

<b>Highways Comment (March 2022)</b>	<b>Applicant Response</b>
1. Inadequate car parking	<p>It is accepted by the Highways officer that car parking provision is a matter for planning judgment. The matter of car parking is assessed and considered in detail within the committee report.</p> <p>In summary, the site is located within an inherently sustainable location, within the SA1 development area which aims to create a high density, walkable neighbourhood. The streets are designed to promote active travel and amenities are easily accessibility.</p> <p>Moreover, the dwellings will be for affordable rent, allowing Pobl to manage the allocation of parking spaces in line with the overall lettings policy for the site.</p> <p>To conclude, the level of parking provision is wholly compliant with the goals of national planning policy, in addition to the SA1 Masterplan and Design &amp; Development Framework. On balance, it is therefore not considered that this matter warrants refusal of the application.</p>
2. Inadequate cycle parking	<p>It is accepted by the Highways officer that cycle parking provision is a matter for planning judgement.</p> <p>Notwithstanding this, additional cycle parking provision has been provided at a ratio of 1 stand (i.e. 2 cycles) per 5 bedrooms, equating to a total of 40 cycle spaces. This is in full accordance with the requirements of the CCSC Cycle Parking Standards SPG (2012).</p> <p>The proposed bicycle stands are detailed within the separate submitted brochure.</p> <p>As such, the issue of inadequate cycle parking has been sufficiently addressed and is not deemed an issue accordingly.</p>
3. Overlong carrying distances to the bin storage area	<p>This is a matter of convenience and usability, as opposed to a Highways safety issue, as is indicated to be the case by the Highways officer.</p> <p>The refuse store area is located adjacent to, and accessed from, Langdon Road – necessary for refuse collection.</p> <p>A second internal access directly from the apartment block cannot be provided due to the configuration of the refuse store and plant room. The provision of an internal access would necessitate the loss of one of the 1100 litres bins, which would result in inadequate refuse storage provision. Furthermore, this would only reduce the travel distance for residents by approximately 8-10m compared to the proposed access arrangements. There are no opportunities for the bin store to be relocated, due to the constrained site area.</p>

	<p>Pobl, who will manage the development throughout its lifetime, will be able to offer assistance and support to residents with refuse, if required.</p> <p>It should also be noted that the CCSC Waste Team do not object in principle to the proposed refuse arrangements.</p> <p>Given all the above, it is not considered that this matter warrants refusal of the application.</p>
<p>4. Inadequate provision for pedestrian movement through the site (width and gradient)</p>	<p><u>Pedestrian Access</u></p> <p>A detailed drawing of the proposed access gates on the principal access footway is submitted (ref. P15). This indicates a clear width of 0.86m for pedestrians, which exceeds the recommended clearance width of 0.81m for wheelchairs.</p> <p>This footway has a gradient of approximately 1 in 14. Building Regulations Part M recommends a maximum of gradient of 1 in 15, albeit provisions are made for where the principal entrance cannot achieve the desired gradient. The relevant extracts of Part M are outlined below:</p> <p><i>'6.4 The provision of an approach which can be used by disabled people, including wheelchair users, will often be a matter of practicability. <b>Variations in topography, available plot area or the distance of the dwelling from the point of access may all influence the type of approach that can be provided.</b></i></p> <p><i>6.5 <b>Normally, the provisions will apply to the approach to the principal entrance. However, if that is not possible in a particular situation, it would be reasonable to apply them to the approach to a suitable alternative entrance.</b></i></p> <p><i>6.6 The approach should be as safe and as convenient for disabled people as is reasonable and, ideally, be level or ramped. However, on steeply sloping plots, a stepped approach would be reasonable.'</i> [emphasis added].</p> <p>The site is steeply sloping, with a levels difference between Langdon Road and the dock promenade of 3m, equating to an average 1 in 18 gradient. It has been necessary for the scheme to mediate between those levels as best as possible and provide reasonable access for wheelchair users. Access to the site from the public realm can be gained in a number of places, including from the dockside and park. These alternative, albeit no less convenient, accesses provide more level routes into the site and are wholly suitable for all users.</p> <p>Moreover, Building Regulations Part M (Access to and Use of Buildings) requires a clear opening width of 0.775m for the principle communal entrances, and a clear width of 1.05m for path approaches. In all instances the minimum clearances are exceeded.</p> <p>A diagram is provided below to indicate accessible routes to and across the site:</p>



	<p>Whilst it is accepted that the main principal vehicle/pedestrian access ramp could potentially be inconvenient for wheelchairs users, given the site constraints reasonable alternatives are provided.</p> <p>It is important to note that the proposed development is for general needs social housing, with wheelchair adapted housing not provided. Notwithstanding this, the Applicant recognises the need for an inclusive development, which has informed the design accordingly. Pobl will be able to allocate residential units to ensure residents have ease of access in and around the site.</p> <p><u>Vehicle Ramp Gradient</u></p> <p>In response to the comments from the Highways officer, a 1m rollover transition has been provided between the vehicle crossover and access ramp. This can be seen on the amended Long Section (Rev 2) submitted. The rollover will prevent vehicles from grounding and also ensure appropriate driver visibility.</p> <p>Moreover, the built form on Langdon Road is set back from the public footway at the site frontage to provide good visibility. For example, the dwelling on plot 4 is set back by approximately 1m, with a boundary treatment of brick wall (0.3m) topped with rail fence (0.9m), and the refuse store is set back by approximately 1.5m. As such, pedestrians will have clear visibility of vehicles coming up the ramp and vice versa.</p> <p><u>Summary</u></p> <p>The proposed development has been designed to be accessible for all users, not least as it is a 100% affordable housing scheme. As demonstrated above, the proposals are fully compliant with Building Regulations Part M (Access to and Use of Buildings), with reasonable alternatives to the principal pedestrian access provided. It is considered that this is a matter for planning judgment accordingly. Additionally, appropriate measures have been adopted to ensure adequate driver visibility upon egressing the site, and therefore this issue is not considered to warrant grounds for refusal.</p>
<p>5. Vehicular access too narrow for two-way flow and/or to allow for a fire tender to enter the site. Fire tender swept path shows encroachment onto the pedestrian element which is considered a danger to pedestrian safety.</p>	<p><u>One-Way Traffic Flow</u></p> <p>A one way traffic flow is not an uncommon arrangement for residential developments with internal parking courtyards.</p> <p>An example of this can be seen at the Harbour Quay apartment block, which is located immediately adjacent to the site, also accessed from Langdon Road. Harbour Quay comprises a greater number of residential units (69) compared to the proposed scheme at D5b (43) and would be subject to more vehicle movements as a result. If the one-way access at Harbour Quay has been deemed acceptable by the Highways Authority, it must follow that this is also acceptable.</p>

	<p><u>Vehicular Access Width / Swept Paths</u></p> <p>In terms of the width of the vehicular access, this is 4.2m with a clearance width of 4.35m – as confirmed on the submitted access gate detail drawing (ref. PL15). Building Regulations Part B requires a minimum carriageway width of 3.7m for fire tender access, and therefore the minimum clearances are exceeded.</p> <p>The submitted swept paths demonstrate that a 10.5m fire tender (based on a Scania model) can access and egress the site without conflict with the access gate and encroachment onto pedestrian areas. The fire tender would need to egress the site in reverse gear, however this is considered acceptable in an emergency scenario, with fire personnel acting as a banksman to guide the vehicle out. Additionally, in an emergency event such as a fire, it is likely that Langdon Road would be closed to the public.</p> <p>Smaller fire tenders, such as 7-8m models could capably access and egress the site in forward gear – as already evidenced on the submitted swept paths.</p> <p>In an emergency situation, pedestrians would naturally be aware of and seek to avoid conflict with emergency vehicles in the event of any encroachment of the vehicle body into pedestrian areas. Furthermore, residents would most likely seek refuge in the more southernly extent of the courtyard, away from the fire tender vehicle(s) which can be controlled via an emergency protocol including appropriate signage.</p> <p>In an emergency scenario, the crux of the issue is if emergency vehicles can gain access to the site – which they can capably do without encroachment to pedestrian areas. Given this, it is not accepted that that there would be an unacceptable danger to pedestrian safety.</p> <p>It should be noted that the Fire and Rescue Authority have not raised an objection to the proposed development, and have stated within the consultation response (May 2022), upon reviewing the proposed plans, that they have <i>'no comment to make on access for fire appliances or water supplies.'</i></p> <p><u>Summary</u></p> <p>As set out above, the proposed access has been demonstrated to be entirely suitable and adequate, and will not pose a risk to pedestrian safety. A 10.5m fire tender has been evidenced as being able to access and egress without risk of conflict with pedestrians. Accordingly, the proposals should not be deemed unacceptable on these grounds.</p>
<p>6. Issues with the layout of the priority junction.</p>	<p>A give way line has been provided at the priority junction, as requested by Highways officers within their initial consultation response in December 2022. This is illustrated and annotated on the Proposed Site Plan (ref. PL_P15).</p>

	<p>A Road Safety Audit has been carried out by a suitably qualified independent party and the report was submitted to Highways officers. The Audit concludes the following: <i>'After due diligence, the team have been unable to identify any areas of concern regarding the information provided in the report of road safety audit.'</i></p> <p>As demonstrated, there are no issues with the layout of the proposed priority parking spaces. Highways safety, and as such, this does not warrant a reason for refusal.</p>
<p>7. No disabled parking provision and those that have been shown as being possible blue badge spaces would prevent pedestrian access to plots 7 and 8.</p>	<p>CCSC Parking Standards SPG does not stipulate any minimum requirements for disabled parking in private residential developments. The Department for Transport 'Inclusive Mobility' document also does not set out any specific standards for private residential developments.</p> <p>Notwithstanding this, the Applicant acknowledges the need for inclusive and accessible parking. In the absence of further guidance, 1no. accessible disabled (Blue Badge) space has been provided conveniently located adjacent to the footway and entrance to apartment block 2. This is equivalent to 5% of parking spaces (5% of 29 = 1.45 spaces), in accordance with the recommended provision in the Inclusive Mobility document for newly built employment premises. The relocated designated parking spaces provide access to any buildings or plots.</p> <p>The accessible space would be used by residents and / or visitors on a needs basis. It should be noted that the proposed development is for general needs affordable housing and not wheelchair adapted accommodation. Therefore, the proportion of accessible parking spaces is considered sufficient to meet anticipated need, however provision would be reviewed by the Council's Access Officer.</p> <p>The proposed development makes appropriate provision for disabled / Blue Badge parking spaces as set out in the CCSC Parking Standards SPG, and therefore it is considered that the development complies accordingly.</p>