

### **APPENDIX 3 - Norfolk County Council Highways Comments:**

Holt Hall is an established site with a long history of educational use as a field study centre. The proposals seek to expand educational and sports facilities for Greshams School and provide a smaller field study centre that may be used by the school or rented to external groups. The site is located approximately 1 kilometre to north of Holt town centre as the crow flies. The applicant has been mindful to ensure that Holt Hall site is integrated into the extant Greshams site with provision of a new walking route between the sites. The Holt Hall site would make use of the extant vehicular access to Kelling Road to serve new car parks for staff and school run drop off and pick up as well as turning space for minibuses, there would also be a set down area adjacent to the sports facilities. This access strategy is demonstrated to be feasible in terms of vehicular movement within the site and onto Kelling Road.

During construction it will be necessary for all traffic and parking associated with the site to be accommodated and turning movement provided for to allow for exiting in a forward gear.

It is evidenced by the Transport Statement that there will be an intensification of trips to the site in comparison to the former use of the site given the expansion of uses within the site, the new car parks and weekday flows of staff and school run traffic. The site will differ from local authority educational sites, in that the majority of pupils are from a very wide catchment area that necessitates travel by the private car. Some travel may be expected from the locality by staff or pupils on foot or by cycle from the Holt urban area and it is envisaged that pedestrians may use Church Walk a private track from the site to the town centre, or by cycle via Kelling Road.

It is noted that Holt Town Council wishes that the junction of Kelling Road/Cromer Road is improved with waiting restrictions (double yellow lines) and a mini roundabout to help tackle constrained visibility at this junction. These issues are noted and accepted; however the Transport Statement only indicates that a shift in Prep school run traffic of 122 cars AM and PM would occur plus some staff and service traffic via this junction. These numbers of vehicle movements are not significant enough in the view of the highway authority to justify redesigning the junction, however it is accepted that localised congestion may occur as a result of extant on-street parking on Kelling Road near to the junction with Cromer Road. However, such problems are not guaranteed to materialise over time as traffic flows re\_calibrate and road users adapt to driving conditions, for this reason a review after 6 months of first use of the site is proposed to trigger a Traffic Regulation Order for waiting restrictions, should this be justified on safety/traffic management grounds.

Kelling Road is a typical rural road, it is unlit and has no pedestrian facilities (footways), it currently has a derestricted speed limit of 60mph although speed surveys indicate an 85th percentile speed of around 46mph. In pre-application discussions the highway authority requested a public footway to be provided along Kelling Road, this has not been proposed by the applicant as it was considered there was insufficient demand for such a facility. Given the likely low demand for usage by the general public to travel to and from the site (other than staff who can use the secured paths), it is considered in planning terms difficult to justify a refusal on highway grounds for the lack of provision of a new footway along Kelling Road to Holt itself. However, it will be necessary for some form of warning signage and markings to alert motorists to the possible presence of pedestrians walking within the carriageway.

It is important to note that visibility from the site access to Kelling Road has been estimated in the Transport Statement using Manual for Streets, this is incorrect as for a rural road the DMRB (Design Manual for Roads and Bridges) is the correct reference document. For a road with an 85th percentile of 46mph, visibility of 2.4 metres x approx. 132 metres in both directions, this differs significantly from the proposed visibility splay of 91 metres shown. The applicant is advised to undertake further feasibility assessment to improve visibility splays,

which should be achievable within the highway extent by trimming of vegetation and a future cutting back regime to ensure this is maintained, the extant white fence extent at the site access may also require minor modification.

It is understood that the new footpath within the field on the eastern side and running parallel to Kelling Road would be gated with a security keypad system. Pedestrian access to this footpath would be restricted to staff, pupils or visitors to the Greshams sites, and not issued to the general public. There would be no public right of way assigned to this new footpath. The applicant has explained that pupil security is necessary at all times.

This security arrangement would also be replicated on Church Walk.

The highway authority is disappointed that unrestricted public use of Church Walk and the field path along the eastern flank of Kelling Road will not be provided, as it is considered good practice to provide sustainable links between new development and local urban centres to facilitate travel on foot.

The applicant has been strenuous in wishing to ensure that pedestrian crossing facility be provided across Kelling Road to serve the new private paths from the site and into the Gresham fields. As submitted for this application a zebra crossing has been proposed with chicane traffic calming measures and a 30mph speed limit for this section of Kelling Road adjacent to the site up to the extant urban speed limit.

The highway authority has given careful consideration to this package measures but regrettably cannot accept these for the following reasons:

- 1) Kelling Road has a rural character and linear alignment, compliance with a 30mph speed limit is extremely unlikely to be achieved, and the provision of chicanes is not considered to be safe given these create new obstructions.
- 2) A zebra crossing is not considered to be appropriate in such a high-speed location or justified given the sporadic nature of pedestrian usage, and the intrinsic urban character of a zebra crossing facility. It would also become a publicly maintained infrastructure asset serving private paths.

It is accepted that the lack of a formal pedestrian crossing facility across Kelling Road will be of concern to the applicant, but the highway authority must consider what is justified in terms of necessity for safety reasons for all road users including extant road users.

Given that the pedestrians using the intra-site footpath will be of senior age or adult staff, it is considered reasonable that an uncontrolled crossing point be provided. This practice has been used elsewhere in Norfolk in relation to other education facilities or where public rights of way cross highways. With a lowered speed limit and package of complimentary measures it is considered reasonable provision for adult pedestrians to cross Kelling Road as recommended. The traffic count submitted by the applicant indicates that traffic flows on Kelling Road are quite low and typical of rural roads, it is accepted that traffic levels will increase for the school run at the start and end of the school day, but these times should not be the same as when pupils and staff are walking between the two sites during the school day when facilities are in use.

It is the view of the highway authority that an alternative package of measures would be suitable as follows:

- i) 40mph speed limit with gateway feature on approach to the site from the north
- ii) Suitable visibility splay from the both the vehicular access and pedestrian crossing points in relation to the revised speed limit to meet DMRB standards.
- iii) Uncontrolled pedestrian crossing point i.e. tactile paving with dropped kerb points either side of Kelling Road.

iv) A package of complementary highway signs and lines that would be subject to safety audit that may include but are not restricted to:

- SLOW markings on Kelling Road
- 20mph advisory school flashing school signs (if demand is tidal)
- Push button or infra-red activated pedestrian warning signs when pedestrians approach the crossing point on either side of the pedestrian access to the site.
- Static school pedestrian warning signs on either side of the vehicular access to the site.
- Pedestrians in road/no footway warning signage on Kelling Road on leaving the urban area and approach to the Holt Hall site.
- Investigation of feasibility of solar powered streetlights or footway lights for the pedestrian crossing point or alternative means of securing power supply.
- Consideration of use of pedestrian barriers to prevent pedestrians walking directly from paths into the carriageway.
- Signage on approach to the crossing point, within private land owned by the applicant to notify pedestrians of need to look both ways and cross in accordance with the highway code.
- Inclusion in the school travel plan of road safety training for crossing local highways.

Further recommendations:

- v) Cross site traffic restrictions to prevent through traffic across the site between Kelling Road and Cley Road i.e. gate controlled across site road.
- vi) School travel plan for the entire Greshams campus i.e. the extant site and Holt Hall.
- vii) Parking/traffic review within 6 months of first occupation of Holt Road of the junction of Kelling Road/Cromer Road, should congestion/safety concerns be determined by the highway authority due to an increase in traffic movements associated with Holt Hall that a Traffic Regulation Order for waiting restrictions be promoted.
- vii) Construction traffic and parking management plan to ensure that all construction traffic and parking can be contained within the site and such vehicles may turn around and exit in a forward gear.
- viii) Visibility splay at Kelling Road site access to meet DRMB standards.

#### **Further comments received 01.08.2024**

The applicant submitted further plans in a Transport Addendum concerning a revised pedestrian crossing arrangement to Kelling Road, the fundamentals of which are acceptable in principle for the purposes of securing planning.

The proposed access strategy to the site for vehicles and pedestrians is acceptable, there is adequate provision for staff and parental parking/drop off and turning for all vehicles including coaches. There is adequate visibility on Kelling Road for vehicles and pedestrians. The proposed barrier across the internal site road will prevent unauthorised through movement of traffic across the site.

In terms of the detailed choice of product for a digital pedestrian sign this will need to be amended and can be done so as part of discharge of condition. I am speaking to Westcotec about a solar powered digital sign that can alert drivers to the presence of crossing children using infra-red detection technology. This would be an alternative to the proposed flashing 20mph advisory sign, which our safety engineers would not consider appropriate to be deployed for ad hoc use, these are typically used in Norfolk when there is an obvious tidal flow at the start and end of the school day and are normally activated with a timer. It is considered that a demand responsive digital sign with a general advisory sign (not a 20mph) would be more suitable for the crossing requirements in this location throughout the entire school day. It is likely that the Westcotec signs will need to be sited entirely within the highway verge for ease of maintenance in future by NCC highways.

Therefore, in the interest of making progress for the planning committee date I wish to recommend that the proposed planning conditions included in my April 10<sup>th</sup> 2024, letter are imposed, with the expectation that the digital pedestrian crossing signage will be subject to detailed assessment as part of discharge of conditions. Your authority may wish to consider how a cyclist would navigate the proposed access barrier, perhaps it can be shortened in length or have a cycle bypass around the barrier to facilitate access if required.