



**Norfolk County Council**

Community and Environmental  
Services  
County Hall  
Martineau Lane  
Norwich  
NR1 2SG

NCC contact number: 0344 800 8020  
Text Relay - 18001 0344 800 8020

Geoff Lyon  
North Norfolk District Council  
Head of Development Management  
Council Offices  
Holt Road, Cromer  
Norfolk  
NR27 9EN

Your Ref: PO/18/1551  
Date: 17 September 2020

My Ref: 9/1/18/1551  
Tel No.: 01603 223272  
Email: david.wilson@norfolk.gov.uk

Dear Geoff,

**Land East and West of Roughton Road, Cromer, NR27 0BF. Outline application for a mixed use scheme consisting of up to 185 homes, an Extra Care Home, supported living for adults with learning disabilities, & a sports & leisure park, together with associated infrastructure.**

Thank you for forwarding the revised Transport Assessment pertaining to the above application.

Further to the Highway Authority responses concerning the above (dated 11 December 2018 and 06 April 2020), the applicant has provided a further revised Transport Assessment and updated the associated proposals for off-site highway mitigation works associated with the development.

I reiterate the concerns expressed in the most recent response but make further specific comment as follows:

#### **Carr Lane junction with Cromer Road/Roughton Road**

Visibility at the Carr Lane junction with Cromer Road/Roughton Road as proposed, should be provided in accordance with Manual for Streets (MfS). Observed vehicle speeds have not been provided at that location.

It is usual practice to measure visibility splays to a point at the edge of the road but Manual for Streets 2 (MfS2) which provides guidance for interpreting MfS, suggests that "a more accurate assessment of visibility splay is made by measuring to the nearside edge of the vehicle track.

The applicant has sought to demonstrate that the available visibility splay north of Carr Lane is 45m which would be appropriate to an 85%ile speed of 31mph. The splay was measured to a point 1.0m from the road edge.

Cromer Road/Roughton Road is a bus route and narrower than the desirable 6.0m. It seems likely vehicles travelling in the opposite direction to a bus will utilise the whole width of the carriageway, particularly as this section is not kerbed.

Using an offset to measure the visibility splay is not considered to be appropriate and is likely to result in the available visibility being overstated.

Measuring to the road edge reduces the splay length to around 34m.

It has not been demonstrated that acceptable visibility can be provided, the potential for conflict between vehicles emerging from Carr Lane and the increased traffic arising from the development is a highway safety concern.

### **Old Mill Road**

The edge build-out required to enforce the proposed priority system at Old Mill has been relocated from the north side of the road to the south. This reduces intervisibility between opposing vehicles using the road and also results in vehicles from both directions passing close to the accesses within its length, increasing risk of collision with emerging vehicles.

### **B1436 Felbrigg Road junction with Old Mill Road**

As previously stated, The B1436 Felbrigg Road provides a strategic link between the A140 and A148, it is a main distributor road for the movement of vehicles in the Norfolk hierarchy and there is no frontage development or facilities for sustainable travel particularly at the junction of Old Mill Road. As such, there is clearly no sense of place and regardless of speed limit, it is clear that neither MfS/MfS2 apply and the road layout should accord with the requirements of DMRB. This junction is located on a straight section of the B1436, north west of a bend on Felbrigg Road. The bend results in less than desirable forward visibility (currently 65m) and can be troublesome north westbound if stationary vehicles are waiting to turn right to Old Mill Road.

The Transport Assessment includes observed vehicle 85%ile speeds of 39.2mph eastbound and 40.4mph westbound at B1436 Felbrigg Road. The observed speeds result in the DMRB requirement for Sight Stopping Distances (SSD) of 120m. DMRB also states that visibility splay set-backs should be 4.5m but does allow a relaxation to a 2.4m setback.

As there doesn't appear to be scope to sufficiently improve visibility to satisfactorily accommodate development traffic, the Transport Assessment continues to argue that the junction should be considered in line with the lesser requirements of MfS which is not considered appropriate.

The TA also seeks to make the junction acceptable by introduction of a 30mph speed limit, high friction surfacing and a flashing 'queue ahead' warning sign.

The criteria in the Norfolk Speed Management Strategy targets 30mph speed limits at developed areas, requiring almost continuous frontage development exceeding 400m in length and that is not achieved at this location. The observed 85%ile speeds were around 40mph, which suggests an acceptable level of compliance with a 30mph speed limit is unlikely.

The speed limit proposal includes enhanced gateway signs and repeater signs with coloured surfacing and roundel markings. The proposed enhancements suggest an awareness that a 30mph speed limit would not be appropriate.

High friction surfacing may be beneficial in reducing the risk of tail end collisions with turning traffic but it clearly does not address the root concern of restricted visibility associated with increased stopping and turning movements associated with development traffic.

The proposed flashing warning sign is not considered appropriate at this location and could cause a distraction to drivers.

## **Summary**

It is acknowledged that substantial highway works are proposed but they are not deemed sufficient to allay the highway safety concerns of the County Council as local highway authority. Further, due to highway extents and land owner constraints at some locations, the feasibility of delivering the proposed scheme of improvements to the highway network, south of the proposed development is not certain. The relocation of the B1436/Old Mill Road junction presents a significant highway safety concern that is not considered resolvable.

NPPF Paragraph 108 requires that assessment of sites should ensure that:

- b) safe and sustainable access to the site can be achieved for all users; and
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

It remains the view of the Highway Authority that safe and sustainable access to the development cannot be achieved for all users and that the impact of the development on highway safety cannot be satisfactorily mitigated.

In the document 'Safe and Sustainable Development' (November 2019), Norfolk County Council defines in section G1.3 what it considers to be a severe impact. The definition includes "Junctions do not conform to modern day standards and improvements cannot be made to bring them up to standard".

Given the highway safety concerns detailed above highway authority continues to consider that the impact of the development would be 'severe' and therefore recommends in accordance with NPPF Paragraph 109, refusal of the application on the following grounds:

SHCR 02/07: The unclassified roads serving the site are considered to be inadequate to serve the development proposed, by reason of poor alignment, restricted width, lack of passing provision, substandard construction and restricted visibility at affected road junctions. The proposals do not adequately provide off-site facilities for pedestrians / cyclists / people with disabilities (those confined to a wheelchair or others with mobility difficulties), specifically, there is no available safe route for sustainable travel to the catchment Primary School at Roughton. The proposal, if permitted, would be likely to give rise to conditions detrimental to highway safety.

SHCR 09 (amended): The proposal would lead to an intensification in right turn movements to Old Mill Road from the B1436 Felbrigg Road which is a main distributor route and would cause undue interference with the safe and free flow of traffic on this important traffic route. In accordance with NPPF Para 109, the Highway Authority would consider impact to be severe, the junction does not conform to modern standards and improvements cannot be made to bring it up to standard.

Please do not hesitate to contact me should you wish to discuss the above,

Yours sincerely,

*Dave Wilson*

Engineer (Major and Estate Development)  
for Executive Director for Community and Environmental Services

Please be aware it is the applicants responsibility to clarify the boundary with the public highway. Private structures such as fences or walls will not be permitted on highway land. The highway boundary may not match the applicants title plan. Please contact the highway research team at [highway.boundaries@norfolk.gov.uk](mailto:highway.boundaries@norfolk.gov.uk) for further details.