

Our Ref: 62673/MJD
Your Ref:

10 April 2024

██████████
Hilltop Outdoor Centre,
Old Wood,
Sheringham,
Norfolk,
NR26 8TS

██████████
Re: Creation of a new recycling centre (RC) to deal with household waste and small amounts of trade waste. RC includes creation of a concrete pad and erection of new staff welfare office and reuse shop (with photovoltaic panels) for onsite sale of items suitable for reuse and ancillary small-scale. Land off Holt Road, Sheringham, NR26 8TW. Planning Ref FUL/2023/0005.

We refer to the recent instructions in relation to the above site, with respect to advice on highways issues pertaining to the proposals and their impact on the local highway network.

In essence we would suggest you could object to the proposals on highways grounds due to the inadequate infrastructure for the future use, inadequate safe and suitable access for all users and the unacceptable impact on highway safety, based on the proposals currently submitted to Norfolk County Council (NCC).

This objection should be in the light of, not only the highway network impact, but also the impact on your business at Hilltop Outdoor Centre (HOC).

For clarity, I have used the references of "A148" for the A148 Holt Road, which links Holt to Cromer and for the road upon which the site is proposed, I have used the reference "Holt Road".

1.0 Introduction

It is understood that the planning application FUL/2023/0005 refers to the proposed recycling centre and the summary of those submitted documents is set out below, taken from the planning application;

- The Site is to replace the existing recycling centre.
- From the Planning Statement, January 2024, Para 2.6, *"Upon completion of the construction of the proposed site, recycling centre operations will be relocated to the new area. The vacated existing site will have its infrastructure removed, and the area will be returned to natural woodland in line with its immediate surroundings."* This implies that the construction of the proposed site and existing operations will continue simultaneously over the construction period of the new Site.
- 0.5015Ha Site development area and the increase in size is due to be 77m² larger from the existing recycling centre.
- The proposed annual operational tonnage is due to be, Municipal waste 5634 tonnes, Construction etc 300 tonnes, Commercial and Industrial 36 tonnes and Hazardous waste 30 tonnes.

- The car parking arrangements on the new Recycling Centre are 4 proposed staff car parking spaces, no disabled spaces, with no powered two wheeler spaces, 6 cycle spaces and no Electrical Vehicle Charging points and 10 loading bays for cars.
- The number of new employees is proposed at four full time equivalent (FTE).
- The operating times are proposed as Monday to Friday 0700 to 1700, 1st Oct to 31st March and 0700 to 1800, 1st April to 30th September. Saturday and Sunday working will be the same, no operation for Christmas Day, Boxing Day and New Years Day. There is no mention of operational hours for Easter Sunday.
- The current use of the land of the proposed Site is agricultural and an Area of Outstanding Natural Beauty (AONB).

2.0 Planning Document Review

We have considered the planning documents associated with the planning application FUL/2023/0005, where our main focus relating to highway matters is associated with the documents below;

- Supporting Planning Statement by NCC dated January 2024;
- Transport Statement by Stantec dated January 2023;
- Drawing PQ3038-HP4-0100-001 - Sheringham, New Access to Recycling Centre, General Arrangement Sheet 1 of 1;
- Drawing 49868/2001/101 Rev P09 – Proposed General Arrangement and Level Design
- Drawing 49868/2001/111 Rev P08 – Vehicle Tracking
- Drawing 49868/2001/112 Rev P08 – Vehicle Tracking
- Drawing 49868/2001/113 Rev P08 – Vehicle Tracking
- Road Safety Audit, A148 – Sheringham Recycling Centre Access Improvement Stage One Safety Audit Ref A148/069, December 2021, provided by NCC, in March 2024.

In reading the documents above, there appears to be very little evidence or other detail on the existing trips to and from the HOC and the impact the new Recycling Centre will have on the existing users of the Holt Road.

There is no data included in the planning application on servicing or delivery vehicles to and from the neighbouring site, HOC, or the increase in traffic at the eastern end of the Holt Road, at the junction improvements with the A148, due to the redirected traffic from HOC.

The proposed changes identified above provide very little consideration to the detail of the highway access aspects, circulatory movement of the vehicles from the HOC will need to negotiate the traffic of the Recycling Centre, or the local highway improvements.

3.0 Planning Policy

In terms of highways, transport and related matters the main relevant policies in this regard are indicated below;

- a) The Core Strategy and Minerals and Waste Development, Management Policies Development Plan Document 2010-2026 (CSDPD) – Policy CS15:Transport and DM10:Transport
- b) The emerging 'North Norfolk Local Plan 2016 – 2036' Proposed Submission Version Regulation 19 January 2022 – Policy CC 9 - Sustainable Transport.
- c) National Planning Policy Framework [NPPF] (2023) – Para 114 and 115: On highways impacts.

Consideration also needs to be given to the relevant Norfolk County Council (NCC) guidance as indicated below;

- d) NCC – Safe, Sustainable Development, Aims and Guidance notes for Local Highway Authority requirements in Development Management, dated July 2022.

The Core Strategy and Minerals and Waste Development, Management Policies Development Plan Document 2010-2026 (CSDPD) – Policy CS15:Transport

The following extracts from Policy CS15 in relation to transport are cited as relevant:

"All proposed minerals extraction and waste management facilities must assess and consider positively the potential for non-HGV transportation of materials to and/or from the facilities, principally by rail or water. This assessment must be included within the Transport Statement/Transport Assessment, if one is required (see Policy DM10).

The County Council will consider minerals and waste development proposals to be satisfactory in terms of access where anticipated HGV movements, taking into account any mitigation measures proposed, do not generate:

- a) *Unacceptable risks to the safety of road users and pedestrians;*
- b) *Unacceptable impacts on the capacity and/or efficiency of the highway network (including the trunk road network); and*
- e) *Unacceptable physical impacts on the highway network (e.g. road or kerbside damage)."*

In regard to the issues above, unacceptable risks to the safety of road users and pedestrians as well as unacceptable impacts on the capacity and/or efficiency of the highway network, together with the unacceptable physical impacts on the highway network (e.g. road or kerbside damage), are all key aspects of the scheme which are examined later in this report.

The emerging 'North Norfolk Local Plan 2016 – 2036' Proposed Submission Version Regulation 19 January 2022 - Policy CC 9 - Sustainable Transport

The following extracts from Policy CC9 in relation to transport are cited as relevant:

"Development will be well located and designed to minimise the need to travel and maximise the use of sustainable forms of transport appropriate to its particular location. Development proposals will be considered against the following criteria:

- 1. the proposal provides for safe and convenient access on foot and by cycle, public and private transport addressing the needs of all, including those with a disability;*
- 2. the proposal is served by safe and suitable access to the highway network, without detriment to the amenity or character of the locality;*
- 3. outside of designated Settlement Boundaries, as defined on the Policies Map, the proposal does not involve direct access onto a Principal Route, as defined on the Policies Map, unless the type of development requires a Principal Route location;*
- 4. the expected nature and volume of traffic generated by the proposal can be accommodated by the existing road network without detriment to the amenity or character of the surrounding area, that it would not cause an unacceptable impact on highway safety and that any residual cumulative impacts on the road network would not be severe;"*

In regard to the issues above, safe and suitable access and those related to highway safety are of key concern. Our concerns are outlined later in this document by virtue of the assessment of the local highway network, which are deficient, based on the current and proposed lack of suitable infrastructure.

NPPF (2023) – Para 114 – 115

The following extracts from the NPPF in relation to transport/highway safety are cited as relevant:

Para 114. *"b) safe and suitable access to the site can be achieved for all users;"*

Para 115. *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*

To investigate the provision of highway safety and access for all users associated with the proposed redevelopment, we will assess the provision of infrastructure to the site as suggested by Paragraphs 114 and 115 of the NPPF later in this report.

4.0 Planning History

In the Planning Statement (January 2024), as a supporting document to the planning application, there is no reference to planning history, only that there was an Environmental Impact Assessment (EIA) screening request made in March 2022, which concluded that an EIA was not required.

5.0 Walking and Cycling

A review of the walking and cycling facilities has been undertaken and it is noted that there is reference in the Transport Statement (TS) in regard to these issues, see para's 4.1.1 and 4.1.2 below as an extract from the TS.

"4.1.1 The site's accessibility by non-car modes of transport is limited. There are no existing footways connected to the site, and similarly there is no dedicated cycle infrastructure – cyclists would be forced to share Holt Road with vehicular traffic. Holt Road is a single carriageway with a speed limit of 50 mph.

4.1.2 Most visitors to the site are likely to be travelling by car or van due to the bulky nature of the materials they will be carrying."

It appears reasonable to expect that most users of the Recycling Centre will use vehicles to access the site, but consideration does not appear to have been given to the users of those vehicles in the event that they need to stop prior to the centre and use the verge in any format, such as an emergency and there is no safe area for pedestrians or cyclists to wait off the carriageway, especially in periods of congestion.

It is considered that a safe refuge should have been considered for pedestrians adjacent to the carriageway in the form of a footway in the event of an emergency or breakdown of vehicles on the approach to the Recycling Centre similar to the new infrastructure at the NCC Recycling Centre in North Norwich on Morse Road, Horsham St Faith, Norwich NR10 3JX.

The provision as suggested above would also help facilitate the need to satisfy the provision under planning policy to deliver a *"safe and suitable access to the site ...for all users"*.

6.0 Existing Site Access and Local Highway Access

Our initial observations in relation to the highway network based on the planning data are as follows;

The TS relays the facts at para 2.1.6 that *"On site observations indicated that users often also park on each side of Holt Road, rather than entering the facility."* It is noted that the existing Recycling Centre parking provision on site is for 8 car parking spaces.

At para 2.2.6 of the TS, it states, "The provision of the additional parking on site will reduce the risk of the vehicles stopping on Holt Road and walking into the facility." This indicates there is a perceived risk that parking on Holt Road will remain both on the northern and southern sides of Holt Road.

Further parking comments are made in the TS at para 6.4.1, where it summarises the impact as *"The site will offer a greatly improved facility, reduce the risk of parked vehicles on Holt Road..."*, which is reiterated at para 8.1.7.

Therefore, we can suggest by the applicants' own documents, there is a prediction of continued parking on Holt Road, which is likely to lead to a situation of pedestrians needing to use the carriageway and no provision has been made for them, which does not comply with policy.

7.0 Traffic Counts and Generation

We have assessed the traffic data within the report and can make the following observations, many of which relate to highway capacity and efficiency of the highway network, some of which have not been considered by the planning documents.

The traffic counts were taken on each side of the existing Recycling Centre accesses. The counts did therefore not account for the traffic movement to and from the HOC in full. At the present time, traffic can access and egress to the HOC from both the west and the east, along Holt Road.

It is possible that the traffic movements to and from the HOC were not captured if they entered and left via the western access along Holt Road. No allowance for this traffic has been accounted for in the traffic counts, the growth or redistribution of traffic to use the eastern access on Holt Road, when the exit to the west is closed.

When considering the additional traffic that would use the improved access, no allowance has been made for the vehicles including coaches and buses that access the HOC and therefore these would all need to leave via eastern access only, as stated in para 7.46 of the Planning Statement.

The traffic generation figures appear to have only considered vehicles of a car length, not any other size when considered the capacity of the parking at the Recycling Centre. Where there are 8 spaces currently, and a future 10 car parking spaces, there is no allowance for larger vehicles or those with trailers, who would need to take up two spaces in some cases as shown on drawing 49868/2001/112 Rev P08, reducing the capacity of the Recycling Centre. Consideration of the capacity and size of vehicles should be considered and justified.

The traffic growth assumed in the TS is in accordance with the predicted waste tonnage produced by the area catered for, by the recycling centre. There appears to be no allowance for population / housing growth in the area above a growth rate of 1.5% per year, used to create the trip generation. It appears that the traffic figures have been taken from existing tonnage and growth of 1.5% applied. However, the tonnage for June 2021, was 318.65 tonnes in June and with growth of 7 years (2022 to 2029 at 1.5%), is 10.5%, which would suggest a highest tonnage month of June in 2029 (year of assessment in the TS), see below;

$318.65 \times 10.5\% \times 12(\text{months}) = 4225.3$ tonnes per annum.

Having reviewed the traffic growth based on the information provided we do not query these, so long as the growth predicted is correct. The planning documents and application form suggest that the capacity of the site is 6000 tonnes, which will potentially create 1774.7 tonnes of waste that does not appear to be in the predicted traffic growth to 2029.

Consideration should be given to this potential difference in growth rate / tonnages or explained if not relevant, as there appears to be a large underestimate of the traffic figures, given the capacity of the site is 6000 tonnes and the predicted is 4225.3 tonnes, a 42% greater increase than predicted.

8.0 Site Layout

We have assessed the site layout and have the following comments to highlight, based on the information provided in the application documents, which appear to create capacity and highway safety issues.

We have assessed the proposals based on the following drawing 49868/2001/101 Rev P09 – Proposed General Arrangement and Level Design.

As previously mentioned, from highlighted text in the TS, it is likely that parking on the side of Holt Road may occur and there is no provision for pedestrians on Holt Road or for the safety of those users. Knowing that the risk is likely to occur as presented in the planning documents, shows very little regard for the users of the site, their safety or the highway safety, thus is against policy.

In terms of the tracking of vehicles that has been completed for the internal circulation, the layout seems very constrained and does not allow for ease of movement into and out of the proposed drop off locations for users. In fact drawing 49868/2001/111 Rev P09 shows how some of the spaces can not be exited without the vehicles using the spaces in front of them, see the top right view of the drawing referenced. In this location, the vehicle using car parking space 6, has to drive over space 7 to exit. How the vehicle gets into the space 6, if there are customers in spaces 5 and 7, is not shown. These issues would also apply to car parking spaces 2,3,4,5 and 6, as well as space 9, if there were vehicles in front or behind these spaces at the time. It appears that the car spaces are 6m long which would satisfy the need for parallel parking on the side of a street, but there is no space for users trying to empty their vehicles, which is the main use of the site. Safety of the users does not appear to have been due regard.

In essence, the layout does not look fit for purpose and highlights many locations of pedestrian safety once they are outside of the vehicles. The circulatory carriageway around the site also appears very constrained and would not allow users safe access to empty their cars, affecting the movement of vehicles around the site. Such conflict is likely to have a detrimental effect onto the highway network, if users can not use the Recycling Centre efficiently, leading to queues onto Holt Road. It appears that the layout does not accord with the emerging 'North Norfolk Local Plan 2016 – 2036' Proposed Submission Version Regulation 19 January 2022 - Policy CC 9 - Sustainable Transport, point 1 and 2, cited above.

A further review of the site layout and tracking as indicated on drawing 49868/2001/113 Rev P08, shows the manoeuvrability of the large HGV's removing the containers from the site. The tracking of the exiting vehicle in the bottom right of the drawing, shows that to exit the site, the vehicle hits the gate and thus can not safely exit the site, thus another potential safety issue, as well as overrunning the kerb radii on the left turn as it enters the A148.

9.0 Highway Improvement Form and Capacity

A review of the implications of the proposed Recycling Centre have been considered in terms of the local highway impact, based on drawing PQ3038-HP4-0100-001 - Sheringham, New Access to Recycling Centre, General Arrangement Sheet 1 of 1;

In terms of the junction proposed with the A148 for the eastern end of Holt Road, traffic figures for the proposals have been assessed. The A148 traffic flow was not counted as part of the TS, however flows taken from DFT traffic data site number 26710 (Coords 609850,339680) at High Kelling which indicates a 2022 Annual Average Daily Flow (AADF) of 12,122. Also, data for site number 46719 (Coords 620077, 340754), near Cromer, shows a 2022 AADF of 8,058. On this basis we can determine that the AADF along the A148 near the proposed site is roughly between 8,058 and 12,122 vehicles.

In consideration of a junction format for the Holt Road and A148, we consider the Design Manual for Roads and Bridges (DMRB) document CD123 - Geometric design of at-grade priority and signal-controlled junctions. See para's 1.1 & Note 1, which states;

"1.1 This document shall be used for the geometric design of at-grade priority junctions and signal-controlled junctions.

NOTE 1 This document is applicable to both new and improved junctions."

In addition please see para 2.12 which states *"2.12 Priority junctions shall include a major road central treatment when the minor road flow exceeds 300 vehicles 2-way annual average daily traffic (AADT), or the major road flow exceeds 13,000 vehicles 2-way AADT."*

As we have explored, the current A148 AADF is less than 13,000 vehicles. However, in the traffic data for 2022, from the TS, the Holt Road flow was 344 vehicles, East of the Recycling Centre, see Table 11 of the TS. This value is already above the threshold as stated in para 2.12 of the DMRB CD123. If the future predict growth of traffic and changes to the allowable movements are considered along Holt Road, then the number of two way flows in 2029, taken from Table 13 of the TS, rises to 484.

The initial 2022 traffic flow is 14% over the threshold for a junction improvement and major road central treatment, for example a right turn lane. The traffic increases in 2029, raising the percentage of traffic to 61% over the threshold, noting a large percentage increase in traffic and thus highlighting the need for a right turn lane junction format or other form with a major road central treatment.

Please note that the traffic figures, see chapter 7 of this letter and referenced from the Applicants TS do not appear to make allowances for the maximum use of the site. The traffic figures appear to only allow for a growth to 4225.3 tonnes, where the maximum capacity is 6000 tonnes, a potential 42% increase on the traffic numbers predicted.

We have shown above that the junction format is not in accordance with the design guidance based on CD 123 of the DMRB, and on this basis is unlikely to be adequate in terms of highway capacity or safety and thus against policy. If the larger increase in tonnage is used up to 6000 tonnes at the site this does not appear to have been assessed in the future years growth. It is noted that there is no junction capacity assessment of the A148/Holt Road junction in the TS, to prove otherwise.

10.0 Highway Safety

In our assessment of the A148 junction improvement, we have considered the vehicle tracking and also the safety aspects completed to date by Norfolk County Council that we are aware of.

We have assessed the Road Safety Audit (RSA) Stage 1, completed in December 2021, which was completed well in advance of the current proposed junction improvement dated Oct 2022 for drawing PQ3038-HP4-0100-001. The RSA Stage 1, now seems to be inadequate on the basis that the proposed junction is different to the original drawing used in the RSA Stage 1.

It is also highlighted that the drawings used in the RSA Stage 1, are not on the planning portal so these can not be viewed or assessed.

When addressing the RSA issues, a brief is normally compiled to the auditor in accordance with DMRB, GG119 – Road Safety Audit, document. The A148 is identified as a class 2B-Primary route in the NCC route hierarchy of roads and thus given the highest county road standard. On this basis it is deemed reasonable that a safety audit should follow due process for the highway improvement for the latest scheme.

It is noted that in the RSA, layout drawings were provided to the auditor, but no note is made of the vehicle tracking to and from the site, with the consideration of the new road improvement, which is now on the planning portal.

The reason for highlighting these issues, relate to the fact that we would like to raise major highway safety matters in the format and movements at the proposed junction, based on the vehicle tracking drawings submitted as part of the planning application, specifically as shown on drawing 49868/2001/113 Rev P08 – Vehicle Tracking.

On drawing 49868/2001/113 Rev P08 – Vehicle Tracking, there are two views of concern, which are the top left tracking and bottom right tracking.

Taking each in the format that they are mentioned above, firstly we will comment on the top left image showing a "Volvo 8x4 5100 W/B Steel Suspns Boughton Hooklift" entering the site from the A148. It is clear to see from this drawing that the vehicle tracking passes over the centre line marking for Holt Road and the Volvo lorry may come into conflict with vehicles on the other side of the carriageway. This is the first point of potential conflict. There is also the potential issue that queuing traffic leaving the Recycling Centre may be queued at this location waiting to enter the A148, from Holt Road, thus preventing the traffic from travelling towards the Recycling Centre, as larger vehicles may not enter Holt Road without conflict. If this conflict arises, there is also the potential that traffic will remain on the A148, not able to enter the Holt Road, or worse, that traffic following the Volvo vehicle, be left straddled across the A148 after attempting to turn right into the junction, only to be held up, due to the Volvo having to wait for oncoming vehicles.

This is deemed to be a highway safety issue, that has not been assessed through highway capacity or RSA assessment. This is not in accordance with policy including the NPPF para 115 and the NCC, Safe Sustainable Development Aim 9, *"To ensure the Major Road Network and Principal Road Network (PRN) can safely cater for sustainable development, which, if not suitably addressed, would otherwise cause fundamental road safety and accessibility concerns."*

The second point regarding the vehicle tracking, also not assessed in the RSA is the tracking of the Volvo lorry leaving the site and travelling towards Cromer, indicated in the bottom right view on the drawing 49868/2001/113 Rev P08. In this tracking, the Volvo lorry is shown crossing centre line of the carriageway on Holt Road to leave the Recycling Centre, and also hitting the gate on leaving the centre area of the Recycling Centre. Again, the lorry crossing the centre line indicates conflict with oncoming vehicles on Holt Road, causing a highway safety or capacity issue if the traffic is queuing to enter the site. In addition, the vehicle tracking highlights the closeness of the vehicle to the carriageway edge without any consideration that the Volvo lorry may run over the carriageway edge, which is against policy, see, The Core Strategy and Minerals and Waste Development, Management Policies Development Plan Document 2010-2026 (CSDPD) – Policy CS15:Transport, *“item e) Unacceptable physical impacts on the highway network (e.g. road or kerbside damage).”*

In all, the vehicle tracking does not cover all the possible movements of traffic entering and leaving the Recycling Centre, even with the westbound exit from the Holt Road banned. No consideration is given to the following movements, or the types of vehicles entering or leaving HOC;

- a) Left in movement from the west from Holt Road, into the Recycling Centre.
- b) Right movements out of the Recycling Centre that may go to the HOC.
- c) Right movements from the Holt Road onto the A148.
- d) Left movement into Holt Road from the A148.

It is very likely that some or all of these movements will be hindered and the free flow of traffic on the A148 disrupted quite significantly, especially from the movements of points c) and d) above.

A review of the accident history has been undertaken in the TS. Whilst this is an indication of past history, the potential intensification of the redevelopment use, in vehicular traffic and mix of pedestrians, potentially on Holt Road, should not be overlooked and suitable mitigation provided to comply with *“..safe and suitable access to the site can be achieved for all users;”* as indicated in the NPPF, Para 114, (b). In addition, no mitigation is considered by the Applicant or in the supporting documentation to assess the impact of the increased mix of pedestrians and intensification of vehicular use. Thus, we can only conclude that the mix of pedestrians and vehicles on the carriageway, will create a highway safety issue, which is contrary to policy CS15 and CC9 identified above.

11.0 Summary Table of Matters Raised

The summary table below shows an indication of the issues that have arisen from the assessment on highway grounds associated with the planning application FUL/2023/0005.

Matters	Comment	Satisfactory	Needs some Upgrade/work	Not Satisfactory
Footways at the site	<p>There is no footway provision for the users on the highway and into the site, even though the Transport Statement highlights there is a likely risk, against policies DM10 and CC09 raised in the text above.</p> <p>On this basis the development layout and highway improvements appear to not comply with policy on safe and sustainable access to the development.</p>			
Site Layout	<p>There are many locations with the development site where the layout creates conflict between circulatory traffic and users of the site.</p> <p>There does not appear to be sufficient space for the users to empty their vehicles and enter and exit the car parking spaces satisfactorily.</p> <p>There are issues associated with the larger vehicles exiting the site.</p>			
Offsite Highway Mitigation / Highway Safety	<p>Consideration should be given to adequate access provision based on CD123 of the DMRB and for all users as cited in the NPPF Para 114. (b).</p> <p>There is potential highway safety issues which are against policy due to the conflict of vehicles as demonstrated in the vehicle tracking with the planning documents. These matters are against policy as cited in Para 115 of the NPPF.</p> <p>The offsite highway improvements do not appear to allow sufficient carriageway for the design vehicles to manoeuvre correctly at the Holt Road/A148 junction, thus against policy CS15.</p> <p>It appears that the traffic growth has not been considered fully in accordance with the capacity of the application, thus against policy DM10.</p>			

12.0 Conclusions

In assessing the planning application, we have sought to understand how the proposals meet the planning policy. In our view, the proposals should align with the key planning policies CS15, DM10, CC09 and the NPPF, as well as the NCC Safe Sustainable Development document. The points of note are outlined below;

Policy CS15 – The proposals fail to show that the site can be delivered against the provision of adequate highway capacity for all users and that there is a potential for the physical impacts of the traffic to impact the new carriageway and verges. In addition, the proposal fails to show there is provision of accessibility to provide for any pedestrians, in a safe manner.

Policy DM10 – The proposals fail to meet the policy in regard of suitable highway access and egress in accordance with published highway guidance and the TS appears to have a large underestimate of the traffic figures.

Policy CC09 - The designs fail to indicate proper provision for pedestrians based on the highlighted potential need due to local parking on the highway and safe and suitable access. There is also very little regard to show that the junction improvements have capacity to accommodate the proposed development traffic as there is no assessment of the A148/Holt Road junction or consideration to the vehicle tracking.

NPPF Para's 114 and 115 - As identified above, there are areas of the existing highway network that do not provide the correct or adequate provision for access, thus a safe and suitable access to the site can not be achieved for all users, against the paragraph 114(b) of the NPPF. In addition, due to the lack of provision, there will be an unacceptable impact on highway safety, contrary to paragraph 115 of the NPPF.

NCC – Safe, Sustainable Development – The proposals fail to show how the junction improvements can be delivered with having a detrimental effect on the functionality of the A148 as part of the principal highway network.

13.0 Summary

We trust the above is sufficient for you to assess and understand the access issues that we have been asked to evaluate through our instructions, highlighting the need to object to the current proposals, as the necessary access does not meet policy.

We trust this meets with your approval but if you have any queries or require further clarification, please do not hesitate to contact us. Should you have any further concerns then we will be happy to discuss those with you.

Yours sincerely

████████████████████, on behalf of Richard Jackson Ltd

Encs

- Road Safety Audit, A148 – Sheringham Recycling Centre Access Improvement Stage One Safety Audit Ref A148/069, December 2021, as this is not on the planning portal.
- See the NCC Planning Portal for all other planning documents referenced herein.

Appendix A

Road Safety Audit, A148 – Sheringham Recycling Centre Access Improvement Stage One Safety Audit Ref A148/069, December 2021



**A148 - SHERINGHAM:
RECYCLING CENTRE ACCESS IMPROVEMENT**

STAGE 1 SAFETY AUDIT

**REPORT REF: A148/069
December 2021**

Report Prepared for: **Highway Projects**
Norfolk County Council



Report Author: Julian Fonseka BSc(Hons) EngTech, MCIHT, MSoRSA

Report Status:

Issue	Status	Purpose	Name/Signature	Date
1	Stage 1 Safety Audit Report	Client Issue	[REDACTED]	21/12/2021
2	Designer's Response	Designer response to Safety Issues raised	[REDACTED]	08/02/2022
3	NM Decision	Implementation of Safety Audit recommendations	[REDACTED]	11/02/2021



INTRODUCTION

This report contains the results of a Stage 1 Safety Audit carried out on the above scheme. The Audit was carried out at the request of Norfolk County Council Highway Projects .

The Audit Team membership was as follows:-

██████████ BSc(Hons) EngTech, MCIHT, MSoRSA (Audit Team Leader)	Engineer Network Safety + Sustainability Norfolk County Council
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██████████ BEng(Hons), I Eng, MCIHT, MSoRSA (Audit Team Member)	Project Engineer Network Safety + Sustainability Norfolk County Council
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The Audit took place via online conferencing on 9 December 2021. The audit comprised an examination of the supplied documentation (see Appendix A) and a site inspection by the Audit Team Leader on 13 December 2021 at 1030 which lasted around 15 minutes. During the site visit the weather was overcast and the road surface damp. Traffic flows were modest and free flowing on A148 and observed speeds appeared to be at or below the 50mph speed limit. The Audit submission provided all necessary supporting information.

The terms of reference are as described in Community and Environmental Services Highways Service Manual Procedure SP03-07-P01. The Auditors have examined and reported only on the road safety implications of the scheme within the main report.

The audited scheme involves alterations to the access of an existing recycling centre.

The auditors have reviewed the three year accident record for the location. There has been one personal injury accident recorded in this period. This involved a vehicles turning right out of the existing junction. The proposed scheme may reduce the likelihood of this type of collision occurring by improving the angle of the existing, obtuse, junction with A148.



ITEMS RAISED AT PREVIOUS AUDIT

The Auditors are unaware of any previous audit being undertaken.

ITEMS RAISED AT THIS STAGE 1 AUDIT

1.0 General

1.1 No comment

2.0 Alignment

2.1 No comment

3.0 Junctions

3.1 Problem – failure to give way

Location – realigned access

A control box, whose purpose is unknown, is situated on the edge of the visibility splay. It is unclear from the submitted drawings, partly because of the thickness of the line used to show the splay, and partly due to the drawing appearing to be based on OS drawings, whether this is in the visibility splay. Obstructions in visibility splays increase the risk of failure to give way collisions.

Recommendation – ensure visibility splay is clear, i.e. 160m at 2.4m setback with an eye height of 1.05m

Designer's Response:

Existing control box do not impede the visibility splay. Sideways visibility splay for a 50mph speed limit road can be achieved from the proposed new access as shown in the supplied drawing with this report.

Network Management Decision: Accepted, no further comment.



3.2 Problem – turning conflicts

Location – realigned access

Non-standard junction radii have been specified at the access. The 6m left turn in radius is inadequate and increases the risks of tail end collisions on A148 as turning drivers have to slow down significantly. The 9m left turn out radius increases the risk of large vehicles overswinging the A148 road centreline with consequent head-on conflict or of verge overrunning.

Recommendation – provide standard corner radii of 10m as per para. 5.6.1 of *CD123 – Geometric design of at-grade priority and signal-controlled junctions*. This should better accommodate the swept path of a refuse vehicle. Should HGV use be anticipated larger kerb radii with tapers may be required to prevent overswing conflicts with other vehicles.

Designer’s Response:

The corner radius on the western side of the proposed new access has been increased to 10m as shown in the supplied drawing with this report.

Network Management Decision: Accepted, no further comment.

4.0 Non-motorised Users

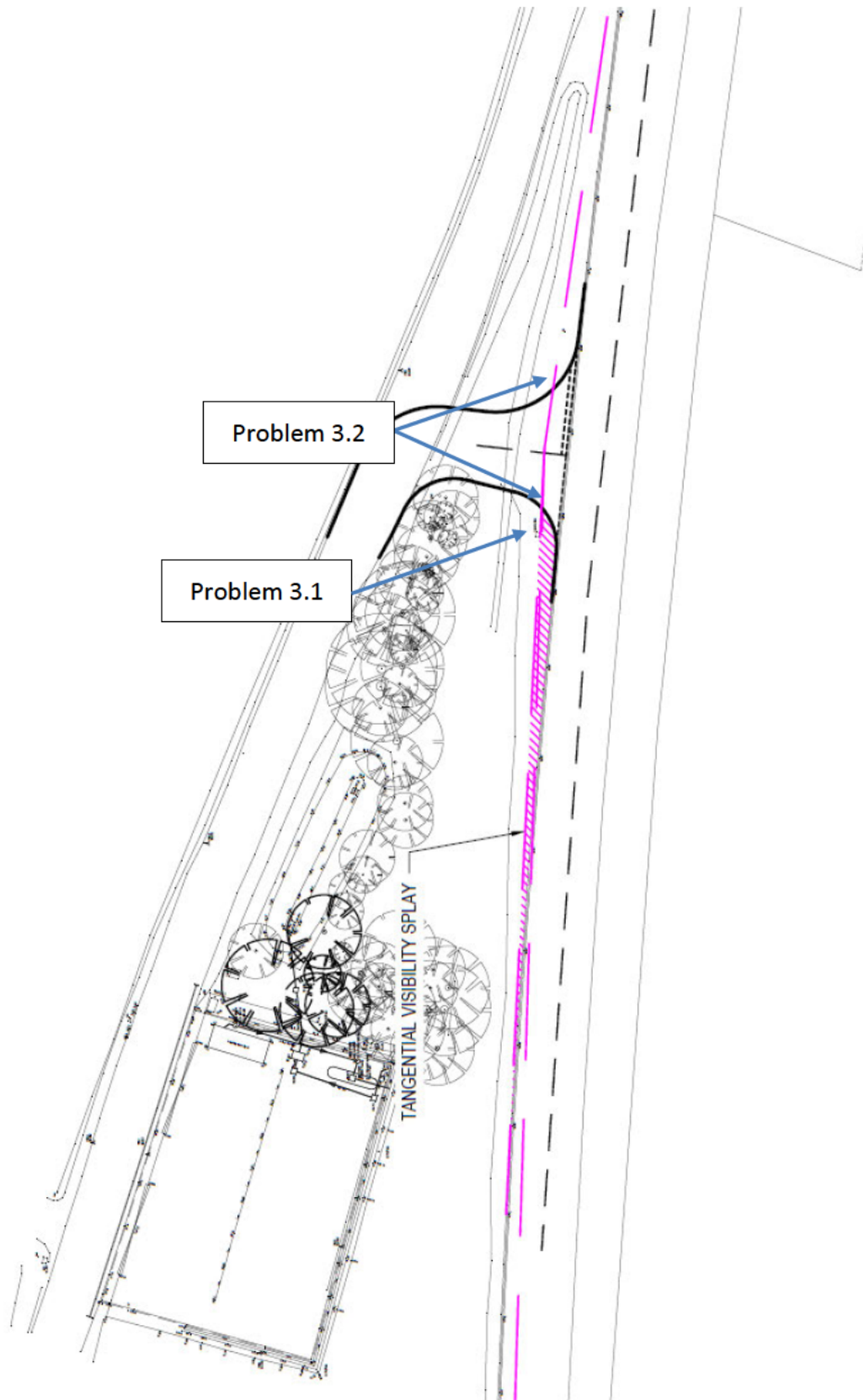
4.1 No comment

5.0 Signs, Lighting and Markings

5.1 No comment



6.0 Problem Location Plan



Template Version #11 09/14
KJA



AUDIT TEAM STATEMENT

We certify that this audit has been carried out in accordance with Norfolk County Council
Community and Environmental Procedure SP03-07-P01

Signed (ATL) [REDACTED] [REDACTED]
Dated 21/12/2021

Signed [REDACTED]... [REDACTED]
Dated 21 December 2021



APPENDIX A: Audit Brief

The following documents were submitted for this Road Safety Audit:

Document Ref.	Scale (if applicable)	Title
2	Various	Plans & Profiles Sheet 1 of 2
3	Various	Plans & Profiles Sheet 2 of 2
4	1:100 @ A1	Design Cross Sections Overview
5	1:250 @ A1	Design Cross Sections
49868_5501_101_P03	1:100 / 1:750 @ A1	Proposed Junction Improvements Sheet 1
49868_5501_102_P04	1:200 @ A1	Proposed Junction Improvements Sheet 2