

Application no: 18/01246/F-2

Location: Warehouse Car Park And Land At Jacobs Douwe Edberts, Ruscote Avenue, Banbury.

This is a revised response following submission of a Transport Assessment in support of the application.

Transport Schedule

Recommendation:

Objection

Whilst the principle of the development shall be supported, there are some issues with the planning application that are not fully addressed.

- The proposals do not demonstrate safe and suitable access to the site for all people (NPPF).
- Travel Plan has not been provided contrary to NPPF.
- The proposal does not fully demonstrate whether traffic arising from the site can be accommodated safely and efficiently on the transport network, contrary to Policy SD1 of Oxfordshire Local Transport Plan 3 and NPPF.

S106 Contributions

Contribution	Amount £	Price base	Index	Towards (details)
Public Transport Infrastructure contribution	£16,000	August 2018	Baxter	A pair of Premium Route bus stop pole /flag /information cases and two shelters
Total	£16,000			

Key points

- Access to the proposed site will require assessment on its ability to accommodate the development traffic.
- Committed development has not been included
- ATC flows and model input flows are considered low
- Car parking provision shall require justification
- A lack of cycle parking facilities on site

Comments:

Access

Although the site currently benefits from vehicular access from Ruscote Avenue, the application seeks to acquire new access off Southam Road utilising the recently constructed service access for Waitrose. This would render intensification of use on this service access. Swept path analysis for a 16.5m articulated vehicle has been submitted (Drwg No. 19519 – 03) which shows that the access is suitable for large vehicles.

I am not satisfied that the form of junction (site access with Southam Road) is suitable in this location on the basis of the traffic flow along Southam Road without a right turning lane. Irrespective of whether the development impact is significant on the network, I feel that with

Southam Road being only about 6.5m wide it would be safe and desirable to provide a marked right turning pocket to allow vehicles to sit while waiting for a gap in traffic without feeling pressured to make unsafe manoeuvres.

DMRB (Vol 6 Section 2, Part 6 TD42/95) clearly gives guidance in choice of major/minor priority junctions such as this, based on traffic flow and volume. The OCC count site on Southam Road has recorded nearly 15,000 AADT (2-way flow) for the past years. Fig 2/2 of DMRB (Vol 6 Section 2, Part 6 TD42/95) shows the preferred form of major/minor junction. The guidance goes on to say that *“This is based on a wide range of factors, such as traffic flow, the nature and proportions of large goods and passenger carrying vehicles, geometric and traffic delays, an initial estimate of entry and turning stream capacities, and accident costs. It should also be based on a consideration of the particular site characteristics such as development and topography”*

Traffic Assessment

The submitted TA has considered the impact of development traffic on the local network. TRICS database has been utilised to establish the level of traffic generation of the proposed development. Interrogation of TRICS database has however found that such a development is likely to generate slightly more trips than has been presented in this TA. Looking at the appended TRICS outputs (Appendix F), it is noted that instead of utilising the busiest hours for such a development, the application has used periods that are less busy from the selected surveys. Periods between 06:00 – 07:00 and 16:00 – 17:00 are identified as the busiest time segments and it is questionable why the application chose 08:00 – 09:00 and 17:00 – 18:00. Using those selected surveys, this anomaly presents a difference 62 inbound trips in the AM peak and 38 vehicles in the PM peak.

The submitted parking accumulation exercise appears to be in support of this, where it is shown that between 06:00 – 07:00 and 07:00 – 08:00 the expected number of vehicles to occupy parking spaces would be 85 and 50 respectively. Taking this into account, I feel the trips presented in the TA are not robust enough to be relied upon.

Traffic surveys were also undertaken to identify the existing traffic flows and speeds in the immediate vicinity of the site, to carry out junction modelling at the site access. The results shown in appendix C again demonstrate that assessment has not utilised the surveyed data in identifying the busiest period. I acknowledge from the surveys, that the busiest periods are clearly outside normal commuting hours. This could be attributed to the survey period which is normally busy for Christmas shopping considering the numerous retail units that Southam Road leads up to. It is also mentioned in 3.2.4 of the TA that snowy weather conditions were characteristic on some of the surveyed days.

Oxfordshire County Council carries out a series of traffic counts across the county to monitor traffic. On Southam Road, about 300 metres north of the proposed access is a count site (Ref CP361) which has recorded since 2013 the Annual Average Daily Traffic. Checking the surveyed data against the county council's counter shows that flows presented by the TA are significantly less than the usual traffic along Southam Road. More information on OCC's Traffic monitoring information can be accessed via;

<https://oxfordshire.maps.arcgis.com/apps/webappviewer/index.html?id=afe8bef2e7514f91bb1bf6ec034fb69b>

Irrespective of this, Southam Road is heavily trafficked on a daily basis including Saturdays registering the highest flows in both directions from the surveyed data. It is my view in light of this that a justifiable approach and a more realistic one would be to use the average 7-day peak flows in the assessment considering the fact that it is unclear of the land use of the site.

The TA in a bid to assess the baseline flows has failed to include committed developments from which trips would likely impact significantly on the network. It is believed that inclusion of some key developments such as residential developments north of Banbury would likely add more trips on the network and also change patterns of trip distribution.

Putting all the above into perspective, I feel that the operation of Southam Road in terms of traffic volume has been under-represented and the TA has not fully assessed the potential impacts of the development.

Parking

Car Parking – Parking provision is something that needs to be balanced right with demand. And this requirement is usually assessed on the uses of the site in terms of allocation of floor space. The proposed development would involve the change of use of the building from B8 class use to B1, B2 & B8 class uses. The application involves an increase in gross floor area from 18,213sqm to 18,658sqm. It should be brought to the applicant’s attention that different land uses command different parking levels. And in respect to this, I would like to refer to the table below showing parking standards for the various land uses.

Table 1		Car Parking Standards - Maximum Levels									
Accessibility Characteristic	Residential	Food Retail **	Non Food Retail **	B1 and A2 Offices	B2 - General Industry	B8 Warehousing	D2 Assembly and Leisure	Cinema & Conference **	Hotel and Guest Hse **	Hospital	Hig Ed
Type 1	1space per dwelling upto 2 beds; 2+beds on merit	Operational Parking Only							on merits	on merits	op ne
Type 2	1 bed - 1 space; 2/3 bed - 2 spaces; 4 bed+ 2+spaces on merit	1 space per 14sqm	1 space per 20sqm	1 space per 30 sqm	1 space per 50 sqm	1 space per 200 sqm	1 space per 22 sqm	1 space per 5 seats	1 space per 1 beds	on merits	1 s sta pe stu
Application Threshold GFA (sqm.)	N/A	1000	1000	500	500	1000	1000	1000	30	N/A	
* Coach parking treated seperately											
** A PPG6 sequential test location policy will apply to these land uses											
Type 1 - This standard may be applicable to Central Policy Areas of larger towns but this will be determined by the District Council											
Type 2 - other areas											
Parking Standards for Developments below the Threshold Size											
There will be a presumption that the above maximum standards apply to developments below the threshold size but each case will be on merit and the parking provision for each site will be considered in the light of its location and the need to reduce private vehicle mileage in line with PPG13											

Based on these standards and on the proposed development (class use and scale), a B1 and B2 development would require 622 and 373 spaces respectively. Whilst the standards shown are maximum, considering that the site location is fairly sustainable the LHA is minded to supporting a justified optimum level rather than a maximum level. The basis of the proposed 186 parking spaces has clearly come from TRICS which is still questionable and has not been considered robust enough. It should be brought to the applicants attention that should the level of parking demand exceed provision, Ruscote Avenue and/or Southam Road are suitable to accommodate any development traffic. It is thus feared that should this happen, staff shall likely leave their vehicles in Banbury Cross retail park.

Cycle Parking – In the preapp advice from OCC, it was mentioned that with an existing footway/cycleway on Southam Road, cycling facilities will need to be extended into the site to provide for safe walking and cycling to work. Covered, secure cycle parking will need to be provided on site in accordance with OCC’s cycle parking standards.

Table 2		Cycle Parking Standards - Minimum Levels								
	Residential	Food Retail	Non Food Retail	A2 - Banks and Professional	B1 -Offices	B2 - General Industry	B8 Warehousing	D2 Assembly and Leisure	Cinema & Conference	Hotel/Guest
Long stay/employee/resident	1 bed - 1 space; 2+ beds - 2 Spaces ***	1 stand per 12 staff *	1 stand per 6 staff *	1 stand per 12 staff **	1 stand per 150 sqm	1 stand per 350 sqm	1 stand per 500 sqm	1 stand per 12 staff **	1 stand per 12 staff **	1 stand per 12 staff
Visitor	1 stand per 2 units where more than 4 units	1 stand per 200sqm	1 stand per 200sqm	1 stand per 100sqm	1 stand per 500 sqm	1 stand per 500 sqm	1 stand per 1000 sqm	1 stand per 20 sqm	1 stand per 20 sqm	1 stand per 10 beds
Notes										
a) where number of staff is not known:-										
* 1 staff per 50 sqm										
** 1 staff per 7 sqm										
*** b) Garages should be designed to allow space for car plus storage of cycles in line with the District Council's design guides where appropriate										
c) 1 stand = 2 spaces : The number of stands to be provided from the calculations to be rounded upwards. The preferred stand is of the 'Sheffield' type										
d) All cycle parking facilities to be secure and located in convenient positions										
e) The County Council encourages the use of covered facilities for longstay/staff cycle parking.										

I am left concerned by the level of provision proposed, showing only 7no. cycle shelters which does not accord to OCC minimum standards. Even taking the least conservative of the land uses in this case (B8), this would require a minimum of 19 cycle stands. Developments should be well integrated with existing or proposed transport infrastructure, including pedestrian, cycle and public transport networks, to ensure that a development is accessible by a variety of transportation modes, and should be of a scale that is in keeping with the capacity of the local highway network. (NPPF)

Public Transport

Owing to Southam Road providing both vehicular and pedestrian access, it is vital to ensure that staff and visitors can access the site by all modes of transport. The Council's Local Transport Plan provides the policy background for much improved bus services in Banbury (the 'Banbury Bus Strategy'), as a means of increasing the proportion of people travelling by bus, and therefore reducing the currently very high proportion of car use for journeys wholly within the town, which causes significant traffic congestion.

There are two pairs of bus stop located on Southam Road in the vicinity of the site access with the closest pair located about 100metres south of the access. The other bus stops (about 200metres) north of the proposed site access were recently improved as part of the Waitrose development which saw a provision of hardstanding, a bus shelters, flag pole including information cases.

Whilst the infrastructure of the bus stops north of the site was uplifted, the quality of the stops closer to the access is extremely poor with just a flag pole and shall need significant improvements. It is considered reasonable for this development to fund for two Premium Route bus stop pole/flag./information cases and two shelters at an indicative cost of £16,000.

The developer will be required to liaise with Banbury Town Council regarding the style of bus shelter to be procured, along with confirmation that the Town Council will take on the ongoing liability for maintenance.

Drainage

The SuDS proposals include the use of underground attenuation tank to manage surface water so that flood risks are not increased. The surface water will be restricted to outflow at 2.3 l/s in the 100-year (+CC allowance) storm event scenario by the use of a hydrobrake. Full detailed design details of the proposed SuDS system were not provided within the FRA and it is proposed to undertake a survey of the existing system on site so that levels and pipe sizes can be confirmed.

Infiltration potential at the site through infiltration testing to BRE 365 was not confirmed. However, the FRA reports that the site is unsuitable for infiltration via soakaway due to high ground water levels encountered at the site.

As well as the consideration of the modelled events, there should be a qualitative examination of what would happen if any part of the drainage/SuDS system fails, to demonstrate that flood water will have flow routes through the site without endangering property and where possible maintaining emergency access/egress routes. This should be supported by a flood exceedance route plan.

It is not clear the party responsible for maintenance of SuDS at the site. A SUDS Management and Maintenance Plan must be provided and include:

- Details of which organisation or body will be responsible for vesting and maintenance for individual aspects of the drainage proposals (individual properties/curtilages, roads, special areas etc) with evidence that the organisation/body has agreed to such adoption. Where the agreement is subject to other legalities, it may be acceptable to provide agreement-in-principle.
- Details of which organisation or body will be the main maintaining body where the area is multifunctional (e.g. open space play areas containing SuDS) with evidence that the organisation/body has agreed to such adoption.
- A Maintenance Schedule setting out which assets need to be maintained, at what intervals and what method is to be used.
- A Site Plan identifying the location of each element of the drainage scheme, including access points, maintenance access easements and outfalls. Maintenance operational areas are to be identified and shown on the plans, to ensure there is room to gain access to the asset, maintain it with appropriate plant and then handle any arisings generated from the site for example by providing a silt deposit area and cut weed composting area for large ponds.
- Any health and safety information required to manage identified residual risks associated with maintenance activities

Travel Plan

It should be noted that at this stage a Framework Travel Plan needs to be included. This framework travel plan will act as an umbrella plan for the site as a whole and will set the travel aspirations for the site. Future occupiers will either make a commitment to take on the objectives of this travel plan or if their business is over travel plan thresholds they will be develop their own travel plan using this framework travel plan as the basis for their plan. If their individual site is above travel plan thresholds they will also be expected to pay the appropriate monitoring fees.

Planning Conditions:

In the event that permission is to be given, the following planning conditions should be attached:

- Standard conditions would need to be applied for:
- Approval of detail of access arrangements
- Approval of car parking and cycle parking detail
- Travel plan
- Drainage condition to include;
 - Discharge Rates
 - Discharge Volumes
 - SUDS (Underground Attenuation Tank)
 - Maintenance and management of SUDS features (To include provision of a SuDS Management and Maintenance Plan)
 - Detailed drainage layout with pipe numbers
 - Network drainage calculations
 - Phasing
 - Flood Flow Routing in exceedance conditions (To include provision of a flood exceedance route plan)

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Officer's Title: Transport Engineer

Date: 02 October 2018
