

## MORAY COUNCIL

### PLANNING CONSULTATION RESPONSE

**From:** Transportation Manager

**Planning Application Ref. No: 10/02055/APP**

**Erection of hotel at Easter Coltfeld Farm Alves Moray for Mr Peter Smith**

***Note: This latest consultation response relates to the additional information provided by the Applicant in the form of a Transportation Statement undertaken on behalf of the Applicant by the consultant Fairhurst.***

I consider:-

	Please
(a) that the application should be refused <i>(please state reasons below)</i>	<input checked="" type="checkbox"/>
(b) that the application should be approved unconditionally	<input checked="" type="checkbox"/>
(c) that the application should be approved, subject to certain conditions <i>(please state conditions and comments below)</i>	<input type="checkbox"/>
(d) that in addition to the above recommendation further information should be passed to the applicant <i>(please state these below)</i>	<input type="checkbox"/>
(e) that further information is required in order to consider the application.	<input type="checkbox"/>

#### Reasons for refusal

##### MLP2008 Policy T2: Provision of Road Access

The Council will require that a suitable and safe road access from the public highway is provided to serve new development and where appropriate any necessary modifications to the existing road network to mitigate the impact of development traffic, and the provision of appropriate facilities for public transport, cycling, and pedestrians. Access proposals that have a significant adverse impact on the surrounding landscape and environment that cannot be mitigated will be refused.

##### MLP2008 Policy IMP1: Development Requirements

c. adequate roads, public transport, and cycling and footpath provision must be available, at a level appropriate to the development.

The proposed development is for a hotel with 22 bedrooms and a 90m<sup>2</sup> restaurant area and a 100m<sup>2</sup> bar area with 55 parking spaces. The hotel/restaurant would be accessed via the U58E Wester Alves Road, which is a single track road with limited passing places and restricted forward visibility at various locations.

The guidance within Chapter 23 of the Aberdeenshire Standards and Design Manual for Roads and Bridges (DMRB) have been omitted from the Transportation Statement. Both of these documents highlight the shortcomings of the road access to the proposed development and identify the need for mitigation measures.

The operation of this hotel and restaurant would be a significant intensification of use at this location and would add traffic to the U58E Wester Alves Road in terms of movements by guests, staff, diners at the restaurant and deliveries. No new trip generation information has been provided in the Transportation Statement. The appraisal of the observed and development traffic (shown in a comparison table within the Response to the Transportation Statement attached to this response) clearly shows a significant increase in the traffic levels on the single track road.

Private accesses and agricultural accesses are not passing places. The locations of marked passing places have been taken into account. Maintenance of the marked passing places falls to the Council. The provision of all 10 passing places is required to provide a suitable and safe access for the proposed development. The requirement for passing places for this development is consistent with the approach agreed recently for a housing development near Dyke.

The section of the U58E Wester Alves Road between the Site Access and Coltfeld Crossroads is very narrow, at only 3.5 metres in width. This part of the U58E will encounter the highest impact from development traffic. This section of road requires widening along the frontage of the site to at least 5.5 metres.

The response from PGU to the applicant confirmed that Transportation Service will assess roads, access and public transport issues separately. For the avoidance of doubt the developer contribution is towards Core Paths, in particular the Moray Coastal Trail around Burghead and Kinloss (MCT).

In summary, the following modifications to the existing public road network would be required to provide a suitable and safe road access to the proposed development.

- Provision of 10 new passing places; and
- road widening to at least 5.5 metres along part of the frontage of the site (north of the Site Access to Coltfeld Crossroads)

Should the applicant take into account the above transportation requirements and submit drawings showing the road widening and the provision of the 10 new passing places to the satisfaction of Transportation, then it is likely that a positive response will be forthcoming.

**Contact: GRH**  
**email address:**  
**roadsdevelopmentcontrol@moray.gov.uk**  
**Consultee: TRANSPORTATION**

**Date 12 July 2011**  
**Phone No 2514**

**Return response to**

**consultation.planning@moray.gov.uk**

Please note information about the application, including this consultation response may be published on the Moray Council's website.

## Response to Transportation Statement (Proposed Hotel, Coltfield 10/02055/APP)

The applicant has submitted a Transportation Statement (TS), received 14 June 2011, to support this planning application. The TS has been prepared by the consultant Fairhurst on behalf of the applicant.

Initial information on the scope for the Transportation Statement was provided to the applicant by the planning case officer. Further details for the TS scope were provided in response to a request by Fairhurst (email 25 April 2011). Transportation also met with a representative from Fairhurst on 19 May 2011 to discuss the preparation of the TS. A copy of the detailed scope is attached to this document.

The submitted TS does not follow the scope set out in Transportation's email nor does it provide the information that Fairhurst's representative offered during the meeting. The following table presents the areas where the TS fails to meet the scope and provide acceptable information.

Scope for Transportation Statement	TS meets the scope	TS fails to meet the scope
<u>Introduction</u>		
Location and Roads	X	
Development Proposals	X	
<u>Policy and Guidance</u>		
2008 Moray Local Plan Policy T2 Road Access		X
2008 Moray Local Plan Policy IMP1 Developer Requirements		X
Transportation Requirements for Small Developments in the Countryside	X	
Aberdeenshire Standards for Road Construction Consent Chapter 23 Rural Areas		X
Design Manual for Roads and Bridges		X
<u>Development Trips</u>		
Trip Generation for Hotel using TRICS daily generation - weekday		X
Trip Generation for Hotel using TRICS daily generation - weekend		X
Trip Generation for Restaurant using TRICS daily generation - weekday		X
Trip Generation for Restaurant using TRICS daily generation - weekend		X
Note: during meeting it was agreed that a survey at an existing similar hotel in a rural location would be undertaken by the applicant.		X
<u>Access to the Development</u>		
Access routes for pedestrians		X
Access routes for cyclists		X

<b>Scope for Transportation Statement</b>	<b>TS meets the scope</b>	<b>TS fails to meet the scope</b>
Access by public transport		X
Access routes for vehicles including deliveries		X
<u>Road Safety and Forward Visibility</u>		
Road Width		X
Existing Passing Place Provision		X
Forward Visibility		X
Review of Accident Data	X	
<u>Objections to Proposed Development</u>		
16 Members of the Public		X
Heldon and Laich Community Council		X
Moray Council Transportation		X
<u>Mitigation Proposals</u>		
<u>Conclusion</u>		

The following sections expand on the reasons why the TS fails to meet the scope.

#### Policy and Guidance

No reference has been made to key Moray Local Plan policies T2 and IMP1. Policy T2 directly relates to the provision of Road Access for developments whilst Policy IMP1 relates to development requirements and states that:

*“Adequate roads, public transport, and cycling and footpath provision must be available, at a level appropriate to the development.”*

The guidance within Chapter 23 of the Aberdeenshire Standards and DMRB has also been omitted from the TS. Both of these guidance documents would highlight the shortcomings of the road access to the proposed development and identify the need for mitigation measures. An extract from ‘Transportation Service Requirements for Small Developments in the Countryside’ and Chapter 23 of the Road Standards is attached to this document.

Finally the TS does not analyse the policies and guidance quoted in relation to how the proposed development would meet and support them.

#### Development Trips

During the meeting of 19 May 2011 it was agreed that a survey of a similar development in a rural location (to be agreed with Transportation) would be an acceptable appraisal methodology and that the results of the survey would inform the TS. No survey information has been provided.

Instead the TS presents the TRICS data supplied by the Moray Council and uses this information to determine the trip generation for the development. The TRICS data supplied by the Moray Council combines surveys of both weekday and weekend movements and

relates to hotels with restaurants open to the general public as well as guests. The scope of the TS clearly sets out that weekday and weekend trip generation are required along with a separation of the hotel from the restaurant. Later in the TS it is argued that the restaurant would only be used by guests of the hotel.

Furthermore in the comparison of the trip generation to the existing traffic flows, the analysis in the TS omits the period from 2000 to 0700 hours. The trip generation for the full time period is set out in the following table, along with a comparison to the observed traffic flows.

Period (Start)	Observed two-way traffic flow	Trip Rate (per bedroom)	Development Trips	Percentage increase in traffic due to Development
00:00	0	0.00	0	0%
01:00	0	0.00	0	0%
02:00	0	0.00	0	0%
03:00	0	0.00	0	0%
04:00	0	0.00	0	0%
05:00	1	0.00	0	0%
06:00	6	0.00	0	0%
07:00	9	0.289	6	+67%
08:00	19	0.534	12	+63%
09:00	11	1.136	25	+227%
10:00	11	0.720	16	+145%
11:00	11	0.594	13	+118%
12:00	12	1.373	30	+250%
13:00	13	1.813	40	+308%
14:00	18	1.229	27	+150%
15:00	18	1.423	31	+172%
16:00	18	1.246	27	+150%
17:00	17	1.796	40	+235%
18:00	14	1.517	33	+236%
19:00	10	1.212	27	+270%
20:00	7	0.957	21	+300%
21:00	6	0.789	17	+283%
22:00	3	2.417	53	+1767%
23:00	2	1.750	39	+1950%
Total	206		457	

There is clearly a significant increase in the traffic levels on the single track road.

The development proposes 55 parking spaces. Based on a 4 bedroom house (3 parking spaces) this is equivalent to 18 residential units.

### Access to the Development

There is no specific information on access to this development other than a general note within the Introduction which states that:

*“it is not envisaged that guests of the proposed hotel are likely to walk/cycle (unless touring) or take public transport due to geographical restrictions.”*

This statement emphasises the key impact arising from the location of the proposed development and highlights the importance of vehicular traffic to the development.

The site is some way from the main A96 and from the nearest B-class road.

In section 4 of the TS the consultant refers to ‘informal passing places’ without any explanation or identification of the locations. During discussion with the consultant the differences between agricultural access, private access and passing place were explained. Subsequent to the meeting and receipt of the TS a diagram showing the typical infrastructure on single track roads has been prepared. The diagram shows the differences between each infrastructure item. Private accesses are not passing places. A copy of the diagram is attached to this document.

There are a total of 10 marked passing places on the U58E between the A96 and the B9089. 3 of the passing places require maintenance work or upgrading. As these are marked passing places the responsibility for any works will fall to the Council. There will be no requirement for the applicant to improve these passing places.

Through an assessment of the single track road in relation to passing place provision (distances between the existing passing places, the intervisibility between the passing places and the locations where there is restricted forward visibility) there are an additional 10 passing places required. A copy of the passing place plan is attached to this document. Discussion with the consultant confirmed that locations with extremely restricted forward visibility, such as the bend where the U58E crosses the disused railway line, have a higher priority compared to passing places on a straight section of road. However, it was confirmed that all passing places were required to provide a suitable and safe access. The TS suggests that 3 priority locations might be acceptable for the proposed development - this is not the case.

### Road Safety and Forward Visibility

Section 6 focuses on the analysis of accident data. There is no reference to the road, its widths, areas where the forward visibility is reduced, nor is there any analysis of the existing passing place provision.

The TS argues that the absence of recorded accidents on the U58E Wester Alves Road means that it would be unlikely that the traffic associated with the hotel would contribute a significant change in the accident rate.

However it should be noted that the existing traffic using the U58E Wester Alves Road is local and most drivers are familiar with the road and its constraints. The traffic associated with the hotel would in the main be drivers who were not familiar with the road. At a similar location, a leisure development, accessed via a single track road with limited passing places there have been reported accidents. This was included in the accident data provided to the consultant.

The requirements for passing places on single track roads is set out in Transportation Service Requirements for Small Developments in the Countryside (TSRSDC) approved by

the Economic Development and Infrastructure Committee (20 April 2010) and the Standards for Road Construction Consent Chapter 23 Rural Areas.

Clearly set out in the objectives section of TSRSDC under Safety is the provision of passing places where appropriate. There are many miles of single track roads in Moray. Many of these do not have an adequate provision of passing places. The requirement for passing places is so that drivers can be in a position to see on-coming vehicles and to safely permit them to pass. The requirement for passing places for this development is consistent with the approach agreed recently for a housing development near Dyke.

#### Objections to the Proposed Development

The TS makes no reference to the objections to the development which were supplied to the Applicant. There is no consideration of the objections nor is there any response to the objections.

#### Mitigation Proposals

The TS recommends that the mitigation measures required for this development are 3 passing places. This is being justified using the analysis undertaken by the Aberdeenshire Planning Gain Unit (PGU) which through their formulas equates the development to 3 housing units. It should be noted that the PGU formula for calculating planning gain for core paths and other non-Transportation infrastructure relates to the floorspace of a development and makes no consideration of the trip generation of the development. PGU advised the applicant that the "Transportation Service will assess roads, access and public transport issues separately". An extract from the PGU response is attached to this document.

It was agreed with Fairhurst during the meeting of 19 May 2011 that the survey of an existing (similar) hotel would be an acceptable methodology to inform the daily trip generation for the proposed hotel, which in turn would be compared to the daily trip generation for a single house in the countryside. It was agreed that this process could be used for the appraisal of the impact of the proposed development.

The appraisal of the development traffic impact referred only to partial trip information (0700 – 2000). The table above shows significant traffic impact between 0700 – 2400.

In relation to the road widening along part of the development site frontage the consultant states that "given the scale of the development and the associated level of trip generation this level of mitigation is not reflective of the scale of development".

This part of the U58E will encounter the highest impact from development traffic. The U58E Wester Alves Road between the Site Access and Colfield Crossroads is very narrow, at only 3.5 metres in width. This section of road would require widening along the frontage of the site to at least 5.5 metres, such that two vehicles accessing the site can readily pass each other. It should be noted that usually a developer is required to widen the road along the entire frontage of the site. However in this instance it is acceptable to concentrate the road widening to a limited section of road along the frontage either side of the site access.

Transportation is not satisfied that the TS fully assesses the development impact nor does it justify the mitigation measures proposed within the TS. Transportation therefore makes the recommendation for **refusal**.

## Transportation Statement Scope

A preliminary indication of the scope for the Transportation Statement was indicated to your client via an email from the planning officer dated 15 April 2011. This email indicated that the scope for the statement would cover the following key areas:

- Development Trips;
- Access to the development (including walking, cycling and public transport);
- Consideration of objections raising transportation issues (including third parties);
- An appraisal of road safety and forward visibility on the single track roads leading to the site from the A96 and the B9089; and
- Mitigation proposals.

The full scope for the statement is as follows:

1. Introduction

- Location and roads within the scope, U58E Wester Alves Road (single track);
- Development Proposals.

2. Policy and Guidance

The policy and guidance section must encompass the following:

- 2008 Moray Local Plan Policies T2 Road Access ([www.moray.gov.uk/downloads/file57755.pdf](http://www.moray.gov.uk/downloads/file57755.pdf)) and IMP1 Development Requirements ([www.moray.gov.uk/downloads/file57761.pdf](http://www.moray.gov.uk/downloads/file57761.pdf));
- The Moray Council's Transportation Requirements for Small Developments in the Countryside ([www.moray.gov.uk/moray\\_standard/page\\_65633.html](http://www.moray.gov.uk/moray_standard/page_65633.html)) ;
- Aberdeenshire's Standards for Road Construction and Consent, Chapter 23 Rural Areas ([www.aberdeenshire.gov.uk/roads/developments/standards.asp](http://www.aberdeenshire.gov.uk/roads/developments/standards.asp)); and
- Design Manual for Roads and Bridges as the National speed limit applies on the roads within the scope of the Transportation Statement).

3. Development Trips

The determination of the daily development trips is to be undertaken using the TRICS database and will take into account the level of parking provision proposed in the planning application, as follows:

- Trip Generation based on the GFA for the hotel using TRICS; and
- Trip Generation based on the GFA for the restaurant using TRICS.

Attached is an initial estimate of trip generation rates from the TRICS database for a weekday, based on the number of rooms at the hotel. The Transportation Statement will need to assess daily trip generation on both a weekday and at the weekend.

4. Access to the Development

An assessment of the accessibility of the development is to be undertaken as follows:

- Access routes for pedestrians;
- Access routes for cyclists;
- Access by Public Transport; and
- Access routes for vehicles, including deliveries (HGV's).

5. Road Safety and Forward Visibility



Assessment of the single track roads leading to the site from the A96 and the B9089 in terms of:

- Traffic flows;
- Road width;
- Existing Passing Place provision (please note that farm and property accesses are not part of the public road and therefore cannot be included in the appraisal of passing places);
- Forward Visibility; and
- Review of accident data.

Transportation has two traffic counts on the U58E undertaken for a limited duration during 2008 and 2009. A summary of the data is attached to this email. The full traffic count information can be purchased from Transportation. However it should be noted that the focus for the Transportation Statement is the suitability of the access to safely accommodate the additional traffic due to the development and not junction/link capacity.

6. Objections to the proposed Development

This section must consider and respond to the Transportation concerns raised by each objector to the development, which includes the following parties:

- 16 members of the public;
- Heldon and Laich Community Council; and
- Moray Council Transportation.

It is our understanding that you client has been issued with copies of all of the above objections.

7. Mitigation Proposals (modifications to the Road Network)

Proposals to mitigate the impact of the development traffic on the single track roads leading to the site which the applicant will deliver.

8. Conclusion

## **ROAD DESIGN PROCEDURES AND STANDARDS**

### **The Moray Council Transportation Service Requirements for Small Developments in the Countryside**

(Approved by Economic Development & Infrastructure Committee 20 April 2010)

#### **Passing Place**

A section of carriageway that is wide enough to enable vehicles to pass each other on a single track road. It is part of the adopted road and is marked by specified road signs.

2.2 The Main Objectives of this part of the Road Design Procedures and Standards are:-

#### **Safety**

- The Creation of Good Access Visibility.
- The provision of Access Lay-bys where appropriate.
- The provision of passing places where appropriate.
- Acceptable spacing from existing Junctions and Accesses.

#### 5.4 Passing Places on Single Track Roads

5.4.1 There are many miles of single track roads in Moray. Many of these do not have an adequate provision of passing places. This often means a deficiency in achieving a suitable and safe access to new developments along these roads.

5.4.2 The provision of passing places on single track roads in the countryside requires a strategic approach i.e. passing places which are appropriately spaced and in locations which will provide benefit where there is restricted forward visibility.

5.4.3 The location of proposed new developments that will be eligible for the provision of a passing place/several passing places (based on scale of development) are those which are adjacent to single track roads and more than 500 metres from the junction with a S2 (single carriageway 2 lane) road. Eligible developments will be required to provide a maximum of one new passing place on the single-track road per dwelling.

5.4.4 The location of existing passing places on single track roads will be taken into account when considering each development proposal.

5.4.5 If an applicant has land which can facilitate a passing place in a strategic location then this method of delivering a passing place will be considered. Any proposal for a passing place should be included in the planning application, shown on the planning application drawings along with evidence of control of the land. Delivery of the passing place would be a condition of the development, prior to the commencement of development. The passing place will form part of the adopted road and will therefore require road construction consent.

5.4.6 From 1st June 2010, in the absence of a proposal for provision of a passing place as part of a relevant planning application Moray Council will seek a Developer Contribution from applicants in lieu of the provision.

5.4.7 An assessment of the inter-visibility of passing places will be required to confirm the location and number of passing places required between the proposed development and the two-lane road.

5.4.8 The dimensions required for passing places are shown at **Appendix B**.

### **STANDARDS FOR ROAD CONSTRUCTION CONSENT AND ADOPTION**

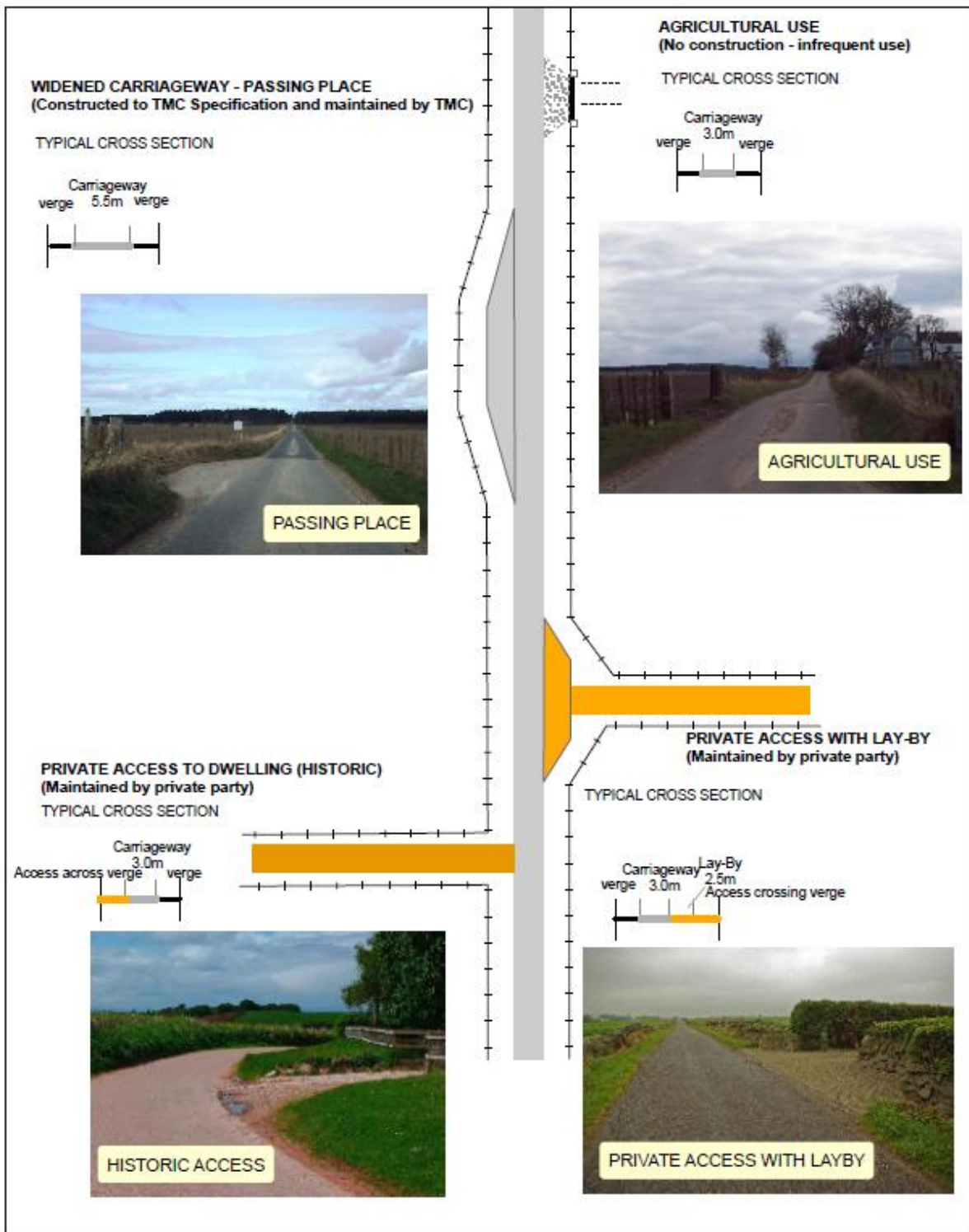
#### Chapter 23 Rural Areas

##### Development on Existing Roads

23.4 Where a development is proposed on a road which does not meet these criteria then the developer will be required to widen the road along the frontage of the development or the access road to the development to the appropriate width.

##### Passing Places

23.5 All passing places in rural areas should be constructed to the dimensions given in Figure 23.1. All passing places must be intervisible and up to a maximum of 150 metres apart. The Developer will be responsible for signage in accordance with the current version of the Traffic Signs Regulations and General Directions.



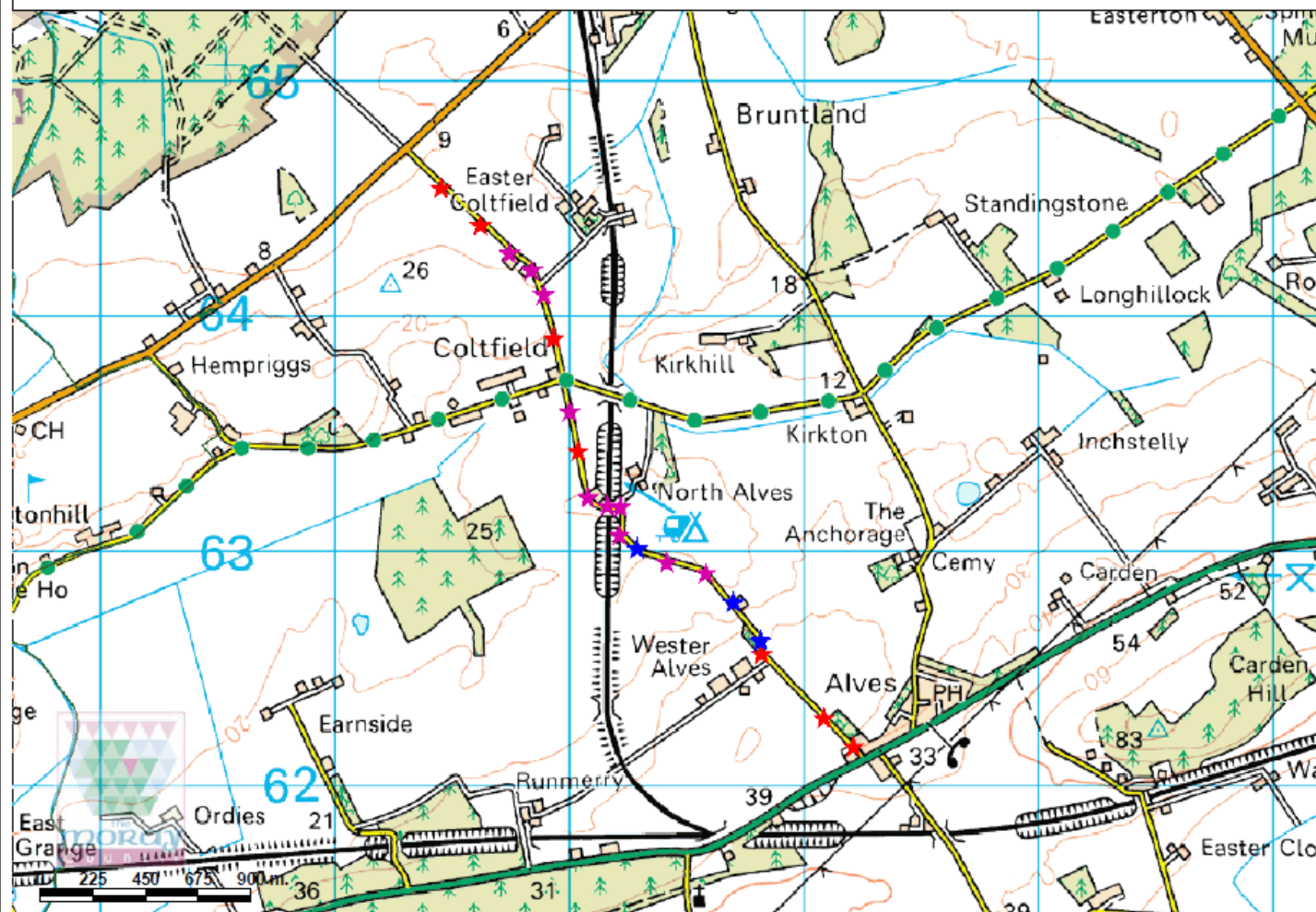
### Single Track Roads - Typical Infrastructure

Notes : Carriageway width at Passing Place = 5.5m

GREY - Denotes maintained by The Moray Council  
ORANGE - Denotes Maintained by private party



# 10/02055/APP Assessment of Passing Places



## Legend

2007 Moray Wards

Scale: 1:25,000



Reproduced from the Ordnance Survey map with the permission of the Controller of Her Majesty's Stationary Office Crown Copyright 2011. The Moray Council 100023422

Notes: red star = existing passing place  
blue star = passing place to be upgraded  
purple star = new passing place to be provided

## Planning Gain Unit Response (Extract)

The applicant should be aware that the Transportation Service will assess roads, access and public transport issues separately.

The assessment is based upon 1,800 m<sup>2</sup> of Hotel accommodation being provided, with 55 car parking spaces.

There is a well developed formulaic approach to assessing commercial developments. The Council is mindful of the land value issues involved in the commercial and retail sector both in the rural and urban environment. In consequence the formula like all others used in planning gain contributions errs on the side of caution. The Council is aware that commercial developments in general bring increased employment opportunities but at the same time these developments also have an impact on local infrastructure.

The general formula is based on the gross floor area (GFA) of the commercial premises plus 50% of hard standing and car parking (Gross External Area–GEA) to give an equivalent number of house units at 10 units per acre that could have been erected on a similar area as follows:-

$(GFA + (GEA/2)) / 400 = \text{HUE (House Unit Equivalent) @ 10 per acre.}$   
E.g. 2,000 m<sup>2</sup> store + 4,000 m<sup>2</sup> car park =  $(2,000 + 2,000) / 400 = 10 \text{ HUE.}$

An individual site usage weighting factor (WF) is then applied to reflect the probable occupation level of the site. These are as follows:

Bulky Goods- retail w/house	0.5
Fast food	0.75
Hotel	0.5
Leisure etc	0.25
Non Food retail	0.5
Office & other commercial	0.75
Petrol	0.5
Restaurant	0.75
Retail food	1
Showroom	0.1
Warehouse	0.05
Workshops/engineering	0.2
Science/medical	0.2

This development would equate to 3 House Unit Equivalents, through the following calculation:

### Hotel space

1,800 m<sup>2</sup> space, with weighting factor applied (0.5) = 900

Car parking 55 spaces =  $1,320 \text{ m}^2 / 2 = 660$ , weighting applied (0.5) = 330

Total 1,230

$1,230 / 400 = 3 \text{ House Unit Equivalents}$

The site provides opportunities for access to the wider community, both to visitors and employees. A number of Core Paths have been identified in the Moray Core Paths Plan

and these include:

The Moray Coastal Trail around Burghead and Kinloss (MCT).

The condition of the paths vary and planning gain contributions would be utilised to enhance and extend these routes and facilities, including signage, to the benefit of visitors to the area, and to the greater community, whilst providing an alternative means of access to staff avoiding car dependency, whilst connecting the site to significant local destinations.

On the basis of £500 per house unit this would equate to **£1,500** as a contribution to be utilised towards environmental and access improvements.