

To Pauline Shearer

Date 21-11-19

Dept. Planning

Ref 19/00575/P3JPA

Highway Authority Planning Consultation Response - 19/00575/P3JPA

Prior notification for proposed change of use of ground to fourth floors inclusive from office (use class B1) to 170 no. residential flats (use class C3)

Halton 5 (Formerly Grosvenor House) Northway Runcorn

Due to the previously discussed timescales please find attached our initial assessment of the proposal.

For clarity the Highway Authority have considered the scheme and information before us as we would a traditional change of use application in line with NPPF guidance utilising the Authorities UDP policies and our knowledge of the local highway network and current design standards and relevant legislation.

Although we acknowledge there is limited scope for comment associated with a prior notification application the lack of detail presented to support the submission raises concerns that the applicant has not considered the potential negative consequences that a development of this nature would have on both existing road users and/or future residents.

We would strongly recommend that the development should not be granted under permitted development as the application does not demonstrate that the proposal is appropriate for a residential use.

In terms of pedestrian access the covering letter suggests the location is sustainable, from the plans and supporting text submitted it is the Highway Officers opinion that this is not the case.

The plans state that access is to be taken from the first floor and on review of the proposals the only doorways appear to be to the Northern Elevation onto Northway, it is noted that there are no connections/ safe links to the adopted footway network therefore the proposal does not consider safe access arrangements for residents/ visitors and is therefore considered not to be accessible.

Taking this point further if additional access/ egress points were incorporated elsewhere in the building there is still limited potential for pedestrian access as there are no direct links to either the East or West, to the North there is a subway leading to existing ramps and steps and although during the shopping centre opening hours Southbound options are suitable these are closed in the evening until the centre opens

the following morning. The unavailability of this link outside the operational hours results in convoluted routes via the above mentioned subway, steps/ ramps to access facilities including the Halton Lea South bus stops and leisure offerings.

We would also raise highway safety concerns in the event of an evacuation as the residents would spill onto the live carriageway in conflict with vehicles.

With regards to bus travel the applicant refers to localised bus stops, which are situated at Halton Lea North. It is the Highway Officers view that the suitability of these stops has not been fully considered as they offer limited travel options due to timetable and routes. There are wider travel options from Halton Lea South but as mentioned above outside of the centre opening hours access to this facility for residents would require navigating a convoluted route crossing several busy junctions.

It is the Highway Officers opinion that the above points demonstrate that the site cannot be considered to be accessible for residents as it does not provide adequately for the necessary links to safe sustainable.

The proposal provides no associated car parking for residents and on street provision in the Halton Lea Town Centre area is extremely limited.

Apart from the cemetery car park to the East which provides 9 spaces the nearest opportunity for on street parking would be Main Street to the North, The Uplands to the East and the Hallwood estate to the South, all of which are not considered suitable for the potential parking demand associated with new residential development in the area.

The majority of the adopted network in the area are subject to TRO's and car parks are private facilities which may permit some daytime parking do not offer evening or night time provision and therefore cannot be considered as associated with the application.

It is noted that a previous scheme proposed under prior notification for 63 apartments within the building provided 41 car parking spaces accessed off a new connection onto Northway. The Highway Officer would note that Northway has been altered since this application and that traffic is now carried in 3 live running lanes, 2 Westbound and 1 Eastbound. Therefore should the applicant propose inclusion of parking and vehicular access they would need to consider the current Highway Arrangement and increase in parking demand aligned to the proposed number of units. Any proposed parking provision should consider provision of accessible spaces including disabled bays and promote the use of low emission modes of travel by including EV charging.

It is the Highway Officers opinion that an application of this scale that provides no parking for residents and no clear strategy in terms of access for servicing is likely to have an unacceptable cumulative impact on the existing highway network.

Although cycle parking is referenced within the text and shown on the first floor layouts it is the Highway Officers conclusion that no consideration has been given to how cyclists will access the building or the facilities and therefore it cannot be considered as a suitable provision.

For an application of this nature it would be considered reasonable that a supporting Transport Assessment be undertaken to demonstrate the suitability of the proposal in terms of accessibility and impact on the existing highway network. In addition to this supporting evidence and likely shortfalls we would also expect that a robust managed travel plan be developed to promote alternative travel choices.

This said it is the Highway Officers considered opinion that the above reports would result in either a substantially different scheme or a proposed use that was more in keeping with the constraints due to location.

Utilising the Councils UDP document we would expect an application of this scale and size to reference policies BE1, BE2, BE19, TP1, TP6, TP7, TP8, TP12, TP14, TP15, TP16 and TP17 to demonstrate the suitability of the proposal.

It is the Highway Officers considered opinion that the current proposal would fail to meet several of these key policies which are set to ensure the goals of the Council and it's residents are met in terms of providing a good quality of life.

When testing against the current NPPF the Highway Authority considers the failure to address access, parking and servicing could directly impact on highway safety and permitting the scheme to progress in its current form is likely to result in residual highway issues that would have a detrimental effect on the existing network and users.

In conclusion the NPPF states at para 108 that

"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable 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.*

As stated above in the Highway Officers comments the proposal fails to take appropriate opportunity to promote sustainable transport modes nor does it provide for safe and suitable access for all. In terms of point c) we would reference forward to lack of information required by Para 111 covered below. The absence of this key supporting information has the effect that the Highway Officer cannot fully consider if detrimental impact caused by the development proposal can be suitably mitigated against to an acceptable degree.

NPPF then sets out in Para 109 that

“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.

As identified above the proposal would have an unacceptable impact on highway safety, in regards to lack of considered parking and access and that the residual cumulative impact on the surrounding area given the shortfalls listed and lack of supporting information is considered to be severe.

Para 110 goes further and provides the following guidance

Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”*

Throughout the Highway Authority response points a) - e) above clearly have not been met and the current proposal would have an unacceptable impact.

Finally Para 111 can be reference with regards to the lack of supporting information namely Transport Assessment and Travel Plan.

“ All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.”

This development will generate a significant amount of movements and as previously stated is not supported by a suitable transport statement or travel plan and therefore does not adequately assess the impact of the proposal.

To conclude the Highway Authority formally object to 19/00575/P3JPA.