



Developments Affecting Trunk Roads and Special Roads

Highways England Planning Response (HEPR 16-01)

Formal Recommendation to an Application for Planning Permission

From: Regional Director, South West Operations Division, Highways England
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To: Bristol City Council

CC: transportplanning@dft.gov.uk
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Council's Reference: 20/02903/P

Referring to the notification of a hybrid planning application referenced above, comprising a mixed commercial/ industrial development for A1, A3, A5, C1, D1, D2, B2 and B8 use classes over seven plots (Area A-G), with full planning permission sought for the development of a hotel within Area F, access works to the site and to the identified proposed development plots, earthworks, ecological enhancements, the diversion of the existing public right of way, landscaping works across the whole site and other infrastructure works to support the proposed development, and Outline planning permission sought for the principle of employment development at Areas A, B, C, D, E and G and the principle of retail, non-residential institutions and assembly and leisure uses at Area F, on land at Access 18 site in Avonmouth, notice is hereby given that Highways England's formal recommendation is that we:

- ~~a) offer no objection;~~
- b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);
- ~~c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);~~
- ~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is not relevant to this application.¹

¹ Where relevant, further information will be provided within Annex A.

This represents Highways England formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gov.uk.

Signature: *Lisa McCaffrey* **Date:** 19 July 2021

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Annex A Highways England recommended Planning Conditions

HIGHWAYS ENGLAND (“we”) has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations with regards to planning application reference 20/02903/P and has been prepared by the Planning Manager for the West of England.

We have undertaken a review of the relevant documents supporting the planning application to ensure compliance with the current policies of the Secretary of State as set out in DfT Circular 02/2013 “The Strategic Road Network and the Delivery of Sustainable Development” and the DCLG National Planning Policy Framework (NPPF), being advised on this matter by our consultants, WSP.

Statement of Reasons

Development Proposals

The application is for Phase 8 of a wider development known as Access 18 at Avonmouth. Access 18 is a former industrial and distribution site, which was the subject of an outline planning application in 2007 following significant environmental remediation works. The current application proposals comprise mixed commercial/ industrial development with supporting office space (Use Classes B2 and B8 – up to 92,903sqm floorspace) and business uses comprising a hotel (125 bedrooms) and small-scale retail space (Use Classes C1, A1-A3 and A5).

The application is supported by a Transport Assessment (TA) and Framework Travel Plan prepared by PJA dated June 2020. A Full Travel Plan has also been submitted in connection with the proposed Hotel. The Hotel Travel Plan is prepared by RGP on behalf of the Hotel operator. A review of the PJA TA, subsequent Addendum document and standalone Technical Notes has informed our response to the application.

Access 18 is located between Avonmouth Way and Kings Weston Lane. Avonmouth Way connects to the M5/ A4/ Avonmouth Way (St Brendan’s) Roundabout, and this junction would form the principal gateway for strategic access to the site. Access 18 is accessed from both Avonmouth Way and Kings Weston Lane, with a private estate road connecting the two. Existing signage confirms the private nature of the road and that there is no legal right of access. Nevertheless, Highways England recommend that any unauthorised use be monitored to ensure that the route is not utilised by through-traffic at any point in the future. The majority of the Phase 8 development would take access from this private estate road although some plots would have alternative access to Boundary Road, or direct to Kings Weston Lane and Avonmouth Way.

Highways England’s interests include the operation and safety of the SRN, which in proximity to the site includes the A4(T), M5 and M49. This includes the M5/ A4 (Portway) Roundabout, M5/ A4/ Avonmouth Way (St Brendan’s) Roundabout and the A4 Crowley Way/ A403 (St Andrew’s) Roundabout. The scale of development and associated traffic generation is significant and has the potential to have a material impact on junction performance.

A new motorway junction, J1 on the M49 will also provide direct access from the motorway network into the Avonmouth Severnside Enterprise Area. The new junction is fully constructed, but a connecting link road into the Severnside Enterprise Area is yet to be constructed. As such, the junction remains closed for use. The new junction is of relevance to the current application in that it is forecast to cater for some movements that currently route via the M5/ A4/ Avonmouth Way (St Brendan's) Roundabout, and was assumed to be open to traffic as part of junction assessment work included in the original PJA TA.

Planning Context

Avonmouth is identified as a priority area for industrial and warehousing development and renewal in Policy BCS4 of the Bristol Core Strategy (2011). The policy continues as follows:

“Principal Industrial and Warehousing Areas will be identified and retained for industrial and warehousing uses. Development in these areas for those uses will be supported in principle. Proposals for port-related activities, manufacturing industry, logistics / distribution, waste management and other environmental technology-related industries will be particularly encouraged. There may be opportunities for the development of energy from waste facilities, biomass energy and further largescale wind turbines.

Development will be expected to respect the area's environmental assets and take account of its physical constraints. Proposals will be expected to contribute to both the strategic and local infrastructure necessary to mitigate any adverse impacts that would result from the development. Freight and passenger rail infrastructure sites will be safeguarded.”

Bristol City Council is in the process of updating its Local Plan and published a draft Policies and Development Allocations document in March 2019. The draft Local Plan includes the Access 18 Phase 8 as an allocated site, “Land at Kings Weston Lane, south of Access 18”, with draft Policy E5 identifying the site as a location designated for the retention, development and redevelopment of existing industrial land for industrial, distribution, energy and port related uses.

Consequently, the proposed development appears to be in accordance with the adopted (and emerging) development plan.

Assessment Scope

As part of assessing the highways impact of the proposed development, PJA have made use of the strategic GBATS4 model developed and operated on behalf of Bristol City Council and South Gloucestershire Council. The model has been used to establish development trip distribution and assignment and derive changes in forecast year traffic flows. Use of the strategic model was considered necessary to take account of the impact of network changes due to take place, most significantly the opening of M49 J1.

The following assessment scenarios have been considered by PJA and within the GBATS model, with weekday peaks hours of 08:00-09:00 and 17:00-18:00 assessed for all scenarios:

- 2019 Base year
- 2025 Opening Year without development
- 2025 Opening Year with development
- 2036 Future Year without development
- 2036 Future Year with development

For the original PJA TA, inputs to junction models for the SRN junctions referred to above were based on the application of flow differences from the GBATS model to 2019 traffic survey data for each junction. The 2019 flow data has been accepted as representative of pre-pandemic traffic levels.

In accordance with paragraph 27 of DfT Circular 02/2013, Highways England has used the 2025 Opening Year scenario to determine potential requirements for capacity mitigation associated with the proposed development.

Trip Generation, Distribution and Assignment

The GBATS model scenarios commissioned by PJA assumed the following mix of land uses across the Access 18 site:

- B1 Business – 3,000 sqm
- B2 General Industry – 47,000 sqm
- B8 Storage or Distribution (Warehousing) – 25,000 sqm
- B8 Storage or Distribution (Parcel Distribution) – 25,000 sqm

Traffic modelling assessment has therefore been undertaken for the mix of employment uses detailed above. As the application form does not detail the same split in B2 and B8 uses, a planning condition limiting the scale of floor area to that assessed is considered necessary, given variation in traffic generation levels for B2 and B8 uses including dedicated parcel distribution.

Highways England has previously accepted that supplementary land uses proposed as part of the application (A1/ A2 retail, Food and Drink outlets, and D2 Gym) will not generate additional trips on the SRN. With additional allowance for the proposed Hotel, the assessment of 100,000 sqm of employment uses is likely to provide a robust assessment of the remaining uses for which planning permission is sought.

Whilst Highways England consider that trip rates for individual site uses may vary from those adopted, the overall traffic generation for the combined site uses provides a robust assessment. Combined traffic generation levels (in Passenger Car Units) for the proposed development are reproduced in Table 2.

Table 2 – Combined Development Traffic Generation (PCUs)

Time Period	Arrivals	Departures	Total
08:00-09:00	554	452	1,004
17:00-18:00	276	393	671

Source - PJA Transport Assessment Table 6.1 Vehicular Trip Generation

The submitted TA used the GBATS model to distribute and assign development traffic. During scoping discussions with PJA, Highways England highlighted concern that the GBATS model underestimates the volume of development trips assigned to SRN routes, and requested comparison to Census ‘travel to work’ data. This was not undertaken by PJA, but has been undertaken by Highways England. In light of continuing concern over the adopted distribution for light vehicles, Highways England requested sensitivity analysis using a revised distribution based on Census travel to work data. The sensitivity analysis assumes higher use of the SRN than originally assessed by PJA, resulting in higher traffic demands at the St Brendan’s Roundabout. The findings of this sensitivity analysis inform our response to the application.

Mitigation

Based on the findings of junction modelling for the 2025 opening year scenario, PJA have proposed the following mitigation relevant to the SRN:

- Change in lane markings and designation on A4 Crowley Way on approach to M5 St Brendan's roundabout.
- Modification of signal set-up for the M5 St Brendan's roundabout to enable a more efficient signal operation, adopting a parallel stage stream method of control whereby control of the main roundabout is split into four streams.

The works to the A4 St Brendan's roundabout will necessitate a general refurbishment of the signal installation. It is also necessary to undertake works at the neighbouring A4 St Andrew's roundabout in conjunction with the St Brendan' Road refurbishment (with the intention that the A4 St Andrew's roundabout scheme would be designed and funded by Highways England, if the timing of the schemes align). The combined scheme of works at A4 Crowley Way, A4 St Brendan's roundabout, and A4 St Andrew's roundabouts, will therefore need to be secured by way of condition to any planning consent.

The scope of mitigation measures has been agreed by Highways England and proposed works to the A4 Crowley Way have been subject to a Road Safety Audit. Given the majority of development traffic is distributed via the M5 and M49, no mitigation works are deemed necessary at the A4 Portway roundabout.

PJA modelling work reported in the Transport Assessment has accounted for both full development build out, and the reassignment effects of the new M49 J1. In light of the identified mitigation requirements, it has been necessary to demonstrate the scale of development that can come forward before implementation of the agreed mitigation works, and whether further mitigation would be required should M49 J1 not open to traffic in the near future.

Interim Assessments

To address the issues around mitigation timing and effectiveness before M49 J1 is open to traffic, PJA have provided further assessments considering operation of St Brendan's roundabout under the following scenarios:

- 2023 forecast year + Phase 1 development, with M49 J1 remaining closed to traffic and no mitigation.
- 2025 forecast year + full development, with M49 J1 remaining closed to traffic but mitigation works to St Brendan's roundabout and A4 Crowley Way.

The assessments apply background traffic growth to the 2019 survey data and have been undertaken outside of the GBATS model with no modelled reassignment to M49 J1. Phase 1 development has been based on initial delivery of the proposed Hotel (Area F) and industrial development at Area A accessed from Kings Weston Lane. The Phase 1 assessment assumes that Area A development traffic will not route via the private estate road and will instead approach St Brendan's roundabout via the A4 Crowley Way.

The interim assessments undertaken by PJA have indicated that the St Brendan's roundabout will be at capacity in the 2023 assessment scenario. The PJA assessment indicates a material increase in queues on the A4 Crowley Way which would not be acceptable to Highways England. Whilst it is accepted that a level of development traffic can be accommodated ahead of mitigation, it will be necessary to limit the scale of development traffic generation by way of condition to avoid unacceptable impacts on the safe and efficient operation of the St Brendan's roundabout.

The 2025 assessment scenario indicates that the upgraded St Brendan's roundabout (following mitigation works) is capable of accommodating development traffic without a severe

or unacceptable impact on the safe and efficient operation of the junction. This assessment does not account for any reassignment effects associated with M49 J1, and is therefore considered a worst case scenario. In reality, it is anticipated that the new motorway junction and connecting link roads will be open to traffic and will therefore provide a level of traffic relief to St Brendan's roundabout.

Construction Traffic Impacts

PJA have estimated daily construction vehicle movements using information from a recently completed development phase at Access 18, and profiled movements across different phases of the build programme. It is anticipated that the majority of movements would be to/from the M5, and spread across the day, although some clustering of movements could occur. It is accepted that construction traffic impacts will be much less than the operational impacts of the scheme. Construction vehicle movements are also forecast to be lower than traffic generation associated with Phase 1 development. Nevertheless, a Construction Traffic Management Plan should be secured by way of condition to any future planning consent.

Recommendation

In light of the above Highways England recommends that planning conditions should be attached to any permission that Bristol City Council is minded to grant in respect of application 20/02903/P, to the effect that:

Condition 1

Use of the employment development hereby approved shall be limited to the following floorspace:

- A maximum floorspace of 92,903sqm GIA of Use Class B8 (Storage and Distribution) and Use Class B2 (General Industrial).
- No more than 50% of the total employment floorspace to be delivered should be B2 use.
- No more than 25,000sqm of employment floorspace to be delivered shall be used for dedicated B8 parcel distribution.

Reason: To manage operational traffic impacts in the interest of the safe and efficient operation of the Strategic Road Network, and in the absence of evidence to show that the impacts beyond this restriction would not be severe.

Condition 2

Prior to occupation of the hereby approved development, no more than one of the following thresholds (see i to vi below) shall be brought forward prior to delivery of a combined scheme of improvement works at St Brendan's Roundabout, St Andrew's Roundabout and the A4 Crowley Way as detailed below, and the improvement works shall be implemented in full and open to traffic no later than 2 years from the start of construction:

- i) Up to 14,000 sqm GFA of B2 development
- ii) Up to 70,000 sqm GFA of B8 development (not including dedicated parcel distribution)
- iii) Up to 13,500 sqm GFA of dedicated B8 parcel distribution development
- iv) A combination of employment uses listed above such that the combined traffic generation (arrivals and departures in combination) shall not exceed 170 PCU trips in the AM peak hour and 125 PCU trips in the PM peak hour.

For the purposes of calculating total traffic generation for a combination of individual employment uses, the following PJA two-way Passenger Car Unit (PCU) trip rates are to be used.

Land Use	AM Peak Hour	PM Peak Hour
B2 General Industry	1.215	0.682
B8 Warehousing	0.236	0.106
B8 Parcel Distribution	1.062	0.915

The combined scheme of improvement works will be comprised of the following:

- Works to A4 St Brendan's roundabout to comprise the provision and design of additional controller unit(s) and MOVA licences to enable parallel stage stream method of control, along with the replacement and upgrade of associated infrastructure including poles, signal heads, cabling, and other ancillary works as defined in Jacobs technical memorandum dated 21st April 2021.
- Works to A4 St Andrew's Roundabout and A4 Crowley Way pedestrian crossings to include the refurbishment and upgrade of signal infrastructure including poles, signal heads, cabling, and other ancillary works, to include connection to St Brendan's roundabout, as detailed in Jacobs technical memorandum dated 21st April 2021.
- Works to A4 Crowley Way to comprise change in lane markings on eastbound approach to St Brendan's roundabout as detailed in PJA drawing number 03446-SK-40-P0, titled 'St Brendons Roundabout Proposed revision to Crowley Way lane destination markings'.

Reason: To manage and mitigate operational traffic impacts in the interest of the safe and efficient operation of the Strategic Road Network.

Condition 3

No part of the B2 or B8 use employment development hereby approved shall be brought into use until an Operational Management Strategy (OMS) has been submitted to and approved by the Local Planning Authority in consultation with Highways England. The strategy will set out the management measures necessary to prevent unauthorised use of the estate road between Kings Weston Lane and Avonmouth Way. Measures contained within the OMS shall thereafter be implemented for the lifetime of development. The OMS shall also detail arrangements for the monitoring, reporting and enforcement of any unauthorised use of the estate road through the Travel Plan review process to be submitted to and approved by the Local Planning Authority in consultation with Highways England.

Reason: To manage operational traffic impacts in the interest of the safe and efficient operation of the Strategic Road Network.

Condition 4

No development shall take place, including any demolition works, until a construction management plan or construction method statement has been submitted to and approved in writing by the Local Planning Authority in consultation with Highways England. The approved plan/statement shall be adhered to throughout the demolition/construction period. The plan/statement shall provide for:

- A construction programme including phasing of works;
- 24 hour emergency contact number;
- Hours of operation;
- Expected number and type of vehicles accessing the site:

- Deliveries, waste, cranes, equipment, plant, works, visitors;
- Size of construction vehicles;
- The use of a consolidation operation or scheme for the delivery of materials and goods;
- Phasing of works;
- Means by which a reduction in the number of movements and parking on nearby streets can be achieved (including measures taken to ensure satisfactory access and movement for existing occupiers of neighbouring properties during construction):
 - Programming;
 - Waste management;
 - Construction methodology;
 - Shared deliveries;
 - Car sharing;
 - Travel planning;
 - Local workforce;
 - Parking facilities for staff and visitors;
 - On-site facilities;
 - A scheme to encourage the use of public transport and cycling;
- Routes for construction traffic, avoiding weight and size restrictions to reduce unsuitable traffic on residential roads;
- Locations for loading/unloading, waiting/holding areas and means of communication for delivery vehicles if space is unavailable within or near the site;
- Locations for storage of plant/waste/construction materials;
- Arrangements for the turning of vehicles, to be within the site unless completely unavoidable;
- Arrangements to receive abnormal loads or unusually large vehicles;
- Swept paths showing access for the largest vehicles regularly accessing the site and measures to ensure adequate space is available;
- Any necessary temporary traffic management measures;
- Measures to protect vulnerable road users (cyclists and pedestrians);
- Arrangements for temporary facilities for any bus stops or routes;
- Method of preventing mud being carried onto the highway;
- Methods of communicating the Construction Management Plan to staff, visitors and neighbouring residents and businesses.

Reason: In the interests of safe operation of the adopted highway in the lead into development both during the demolition and construction phase of the development