

McCallum, Fiona

From: Gerard.McPhillips@transport.gov.scot
Sent: 13 June 2023 11:22
To: Scott, Fiona
Cc: ianmacarthur; Bain, Peter (Planning); roadsconsnaki; Ross, James; planningconsultations@scottishwater.co.uk; development_management@transport.gov.scot; enquiries@wosas.glasgow.gov.uk; Carson, Anthony; mark.knowles; localreviewprocess
Subject: RE: Response to Request for Further Written Information - Notice of Review - Reference 23/0003/LRB (Planning Ref: <20/01901/PPP> - Land North of Swallowtale, Achnagoul, Inveraray [OFFICIAL]

Follow Up Flag: Follow up
Flag Status: Completed

Fiona

I refer to the above LRB and the further additional information submitted by the applicant's architect and consulting engineers (Ormonde and Millard) in their email below.

Having reviewed these comments, Transport Scotland would welcome the opportunity to provide some clarity and corrections on some of the information presented.

There are various comments presented suggesting that the application for a house is likely to result in a reduction in the number of vehicle movements currently associated with the byre and therefore offer an overall reduced level of trips using the existing access. These comments appear to be on the basis that a single dwelling has the potential to generate an average of 2 – 2.5 daily two way trips. Transport Scotland would disagree with this level of trips and would advise that a single dwelling is generally assumed to generate an average of 5 to 6 (five to six) two way trips per day. This figure is taken from the TRICS database (www.trics.org) and relates to the 12 hour period 0700-1900.

On that basis, it seems unlikely that a dwelling will in actual fact result in any reduction in trips associated with the existing access.

With regards to the previous / historic application 09/00745/DET, I was not involved in the consideration of this application and am unaware of any previous comments by Transport Scotland such that we would have been prepared to allow the application on the basis that HGVs tend to be higher and that as such visibility standards are significantly better than those experienced by car drivers. Millard are quite correct in pointing out that visibility standards (presented in the Design Manual for Roads and Bridges) are regulated on the basis that all vehicles are classified as the same no matter the height of the vehicles and there are not separate visibility standards for cars and HGVs.

Notwithstanding, no such difference in visibility standards has been applied in the consideration of this latest application.

As regards what the applicant's architect refers to as the "*elephant in the room*" and Transport Scotland's previous approval for the use of the access for timber extractions and borrow pit work – ABC Ref. 19/01422/MIN (TS Ref. NW/331/2019), some clarity is required here, as what has been presented by both the architect and Millard is considered to be misrepresentative.

Application 19/01422/MIN was for the temporary use of an existing borrow pit to extract rock. Access to the site off the A83(T) was via the same access as would provide access to the proposed dwelling above.

Transport Scotland did not object to this application – on that we can all agree.

However, the Written Statement submitted in support of 19/01422/MIN – dated 12/9/19 and still available on the ABC planning portal, highlights it was anticipated that *a maximum of 10 low loader trips would be needed for mobilisation and demobilisation of site plant and equipment throughout the duration of the works.... Once the Borrow Pit is operational all traffic used to transport processed stone will utilise a combination of new build and upgraded tracks within the forestry.*

The Written Statement goes on to highlight with regards to proposals for preventing mud and other materials being dragged on to public roads: *Road brush / sweeper will be available if necessary, although we do not anticipate that this will be an issue given that once operational all Borrow Pit traffic will be running on the existing forestry network.*

On that basis, Transport Scotland did not object to application 19/01422/MIN.

In terms of the architect's suggestion that Transport Scotland *does not explore improvements that could be made* to the existing signage etc. on the A83(T) approaches to the existing access, Transport Scotland would advise as follows regarding the suggested improvements:

- Rumble Strips – whilst these can be used in some locations across the trunk road network (TRN), generally on the mainline approaches to major junctions i.e. roundabouts, their use in isolation on the approaches to below standard minor accesses is not generally considered appropriate, on both environmental and safety grounds. Not only are rubble strips or the like noisy, but they create a danger in such situations for two wheeled users. They also introduce discomfort to all road users. Additionally, were Transport Scotland to introduce rumble strips on the approaches to this single access, we would no doubt receive requests to install them more widely across the TRN for similar accesses which, for the reasons outlined, would not be appropriate.
- Flashing "SLOW" signs – again there are various examples of these across the TRN, but they are generally introduced in locations where there is a known accident issue or such. Transport Scotland would not proactively introduce these in a location to simply ameliorate a sub-standard access where there are currently no accidents. Doing so would again likely set a precedent and we could be asked for these on the approaches to other sub-standard access across the TRN. In addition, even if the applicant were to pay for the installation, Transport Scotland would be left with the operational and maintenance liability, as well as the replacement liability if the signs were damaged.

The current signage and carriageway markings in place on either A83(T) approach to the access are therefore considered to be appropriate for the current situation and comply with the necessary design standards.

Transport Scotland therefore remains of the opinion that the application should be refused on the basis that:

1. *The proposed development would result in increasing the number of vehicles entering and leaving the traffic stream at a point where visibility is restricted thus creating interference with the safety and free flow of the traffic on the trunk road.*
2. *The proposed development would result in an intensification of waiting and right turning manoeuvres from the trunk road at a location where forward visibility for approaching westbound traffic on the trunk road is substandard thus creating interference with the safety and free flow of the traffic on the trunk road.*

Many thanks.

Regards.

Gerard McPhillips

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From: Ormonde ADPM <>

Sent: 08 June 2023 22:18

To: McCallum, Fiona <Fiona.McCallum@argyll-bute.gov.uk>

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Subject: Response to Request for Further Written Information - Notice of Review - Reference 23/0003/LRB (Planning Ref: <20/01901/PPP> - Land North of Swallowtale, Achnagoul, Inveraray [OFFICIAL]

Dear Fiona,

Response to Request for Further Written Information - Notice of Review - Reference 23/0003/LRB

Having had the opportunity to study the responses received thus far, on behalf of the applicant, I would like to make our final submission to present to the Review Body.

Transport Scotland's Gerard McPhilip detailed response regarding existing signage presents a useful commentary on what is already in place but does not explore improvements that could be made. Being proactive, I would suggest that additional written "JUNCTION AHEAD" wording could be added to the existing signage and possibly even rumble strips applied to the road surface to make drivers more aware.. Furthermore, illuminating flashing "SLOW" signs could be installed, possibly at the applicant's expense, which would further assist drivers to the presence of an already statistically safe junction. These are used to great effect in the Highlands and have proven to be a great benefit to motorists (a great improvement on "SLOW" road markings which wear over time).

It was quite telling that Mr McPhilip's final paragraph, giving the reasons for refusal, omitted the elephants in the room - Transport Scotland's previous approvals for the use of this junction for timber extractions and borrow pit works:

"In considering the planning application Transport Scotland has already taken cognisance of the existing traffic signs and carriageway markings in place along the A83(T). However, despite these being in place, Transport Scotland remains of the opinion that the additional traffic associated with the planning application has the potential to impact on the safe and efficient operation of the A83(T). Transport Scotland would therefore continue to recommend that the application be refused."

Transport Scotland believe that an additional dwelling house on a Brownfield Site in an area zoned for Housing would cause a greater impact on the safe and efficient operation of the A83 than Forestry and Borrow Pit workings with their associated heavy vehicle movements. To the applicant and myself, there appears to be a disconnect somewhere. With this in mind, let us present the facts that require to be taken into account which are backed up by the document provided in support by Millard Consulting who are experienced Transport Consultants - their original document is attached for reference.

1. This is an existing junction serving 5 residential properties and not a new access to serve a single dwelling
2. There have been no accidents reported at this junction
3. Transport Scotland have approved the use of this junction for slower moving vehicles for timber extraction and borrow pit extractions
4. The development is in an area zoned for housing and is a Brownfield Development
5. The site forms part of a small holding. The applicant would be well within his rights to keep livestock all year round on the site which could require several daily visits for checks, feeding, lambing etc. etc. This would create additional vehicle use over the junction which would not require the input of Transport Scotland.

With the greatest respect to Transport Scotland, the applicant and myself feel they have simply got this one wrong and are refusing to take the facts presented to them into consideration. This is why we find ourselves in the current situation and require the support of the Review Body to overturn the delegated refusal. Transport Scotland have already indicated that the Case Officer could have approved the application against their recommendation. Given the difficult position this would have put the past 3 Case Officers into, we ask the Review Body apply common sense and recommend approval for this application and send it to the Scottish Ministers for final approval.

Kind Regards,

Duncan Macleman BSc (Hons) Dip. Arch

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