APPENDIX JPH-L

Draft Statement of Common Ground on Highway Matters

APPEAL BY MESSRS PRICE & BALL, LAND SOUTH OF CHEAR FEN BOAT CLUB, TWENTYPENCE ROAD, COTTENHAM, CAMBS, CB24 8AH
APPEAL REFS: APP/W0530/W/22/3308444

LPA REF: 22/01703/FUL

STATEMENT OF COMMON GROUND ON HIGHWAY MATTERS BETWEEN MR JEREMY P. HURLSTONE OF THE HURLSTONE PARTNERSHIP LIMITED (ON BEHALF OF THE APPELLANTS) AND DR JON FINNEY OF CAMBRIDGESHIRE COUNTY COUNCIL (AS HIGHWAY AUTHORITY)

IN TERMS OF HIGHWAY MATTERS IT IS AGREED BETWEEN THE PARTIES THAT:-

1. The proposed development would be served by an existing access to Twentypence Road, which has served the Appeal Site for decades.

2. The existing access has a good safety record with no recorded personal injury accidents involving vehicles turning between it and Twentypence Road between 1999 and 2022 inclusive. From the County Council records, within the last 5 years there have been ~~two~~ three personal injury accidents in the ~~immediate~~ vicinity of the access and within the extents of the visibility splays: ref: 873413 date 30-08-19 ~~this~~ was a fatal, single vehicle incident at the Long Drove junction approx. 85m to the south of the access ~~(shown at the access) ;and~~ 972079 date 17-07-20 was a serious single vehicle accident ~~(shown on the bridge~~ approx. ~~100m~~ 30m to the north of ~~from~~ the access ~~i.e. with the proposed inter vehicle visibility splays), and~~also ~~on~~in 23-09-2023 1358769 ~~occurred at the access~~ a slight two vehicle accident at the Long Drove junction. ~~These need to be detailed and discussed~~.

3. At the planning application stage, the Highway Authority raised concerns regarding the impact of the proposed development on highway safety due to potential delays to through-traffic travelling along Twentypence Road and a visibility provision below its default 215m requirement for a 60 mph road, which had not been justified with empirical traffic survey and speed data. The Highway Authority's comments made it clear that if empirical data were submitted that interpolation of the inter vehicle visibility splays would be acceptable.

4. Data from ATC counters to the north and south of the Appeal Site access confirmed approach speeds of 46.3 mph southbound (from ATC Site 1) and 54.6 mph northbound (from ATC Site 3). Speed data at Site 2, near the access itself, revealed speeds of 47.9 mph northbound and 46.8 mph southbound, which demonstrates the speeds are variable and not constant in the vicinity of the Appeal Site and its visibility splays. From the perspective of the Highway Authority the data gathered at Site 2 (the site access) provide the most robust results for determining the required inter vehicle visibility splays.

5. The ATC data were collected between 9th January and 15th January 2023. The Council has advised t~~T~~his is during the winter maintenance period in Cambridgeshire, and~~.~~ w~~W~~hile the overnight temperatures fell close to freezing, no gritting runs were called during this period. Given this fact it is agreed the speeds at which motor vehicles traversed the road are ~~likely to be~~ representative. ~~of a normal range~~

6. Daily traffic flows varied between 1959 and 5194 vehicles across the three count sites, with averages of 4149, 4184 and 4157 vehicles at Sites 1 to 3 respectively.

7. Based on the DMRB parameters for stopping (2 seconds perception/reaction time and 0.375g deceleration rate) for speeds above 60 kph as detailed in MfS2 Table 10.1, the calculated stopping distances are 99.623m to the right (north) and 129.788m to the left (south). The Highway Authority will accept the data collected from site 2 only, as it considers the others are too distant to be applicable. Whilst Mr. Hurlstone disagrees, the impact of the difference between the southbound speeds on the distances is not significant on the outcome of the review. Using an 85% speed of 46.6mph ~~48.8mph~~ (~~78.5kph~~74.99kph) ~~I calculate~~ the SSD to the north of the site access ~~to be~~increases to 100.640m.~~110.1m though no measurement of gradient has been included and given this length is on the downward embankment of the bridge this should be included.~~ As the northbound speed at Site 2 is less than at Site 3, the splay to the left (south) calculated from Site 2 data (47.9 mph) reduces to 105.146m.

8. The visibility splays measured on-site from the 2.4m set-back extend 127.1m to the right /north along the roadside edge of the opposing fence, but in practical terms extend 146m within the Highway Boundary due to the local topography, and 503.5m to the left / south. As a result, they exceed the distances calculated from the relevant directional speeds at all ATC sites.

9. Capacity assessments undertaken at the access reveal a maximum Ratio of Flow to Capacity of 0.063 with maximum queues of 0.1 vehicles and inclusive delays of up to 0.18 minutes per vehicle, all of which occur on the outbound movement from the site, confirming capacity and delay is not a constraint in this case.

10. The information and plans provided within Mr. Hurlstone's Proof of Evidence and its Appendices demonstrate that visibility at the Appeal Site access is acceptable. Therefore, the proposed access will operate within the reasonable and accepted range of risks and hazards that a user of the highway should be prepared to encounter while traveling. Also, ~~T~~the impact of turning traffic at the access, ~~which~~ would ~~also~~ not lead to significant delays to through-traffic travelling along Twentypence Road.

11. Having considered the foregoing, the additional information provided within the Proof of Evidence, satisfactory vehicular access has been demonstrated and confirmed. Therefore, reason for refusal 8 is not contested and may be considered withdrawn from the Appeal proceedings.

12. As a result of this agreement, unless specifically requested by the Inspector or Local Authority, it is not anticipated that either of the undersigned will attend the Inquiry to give further evidence on these matters.

Signed: Signed:

J P Hurlstone

Date:

J Finney

Date:

Jeremy Hurlstone

From:	Jeremy Hurlstone
Sent:	30 January 2025 00:34
To:	Jon Finney
Cc:	'Scrivener Dean'; Vanessa.Blane@3csharedservices.org; Helen Morris; gps appeals
Subject:	RE: Chear Fen / Twentypence Road - 22/01703/FUL
Attachments:	Report-2019350873413.pdf; Report-2020350972079.pdf; Report-2023351358769.pdf; ATC Aerial.pdf; 25-01-29 Highways SoCG D4 220605.doc

Dear Jon,

Thanks for your e-mail and comments on the draft SoCG. It is helpful to know that you agree sufficient information has been provided to allow the 8th reason for refusal to be overcome, which is excellent news and should hopefully save time and expense to all parties.

To an extent, I can understand your requirement for the additional information to be included regarding the accidents, as you have not had the benefit of seeing my Proof yet. The SoCG was originally drafted as a much shorter document on the assumption it went with the Proof, and therefore you would have had the opportunity to consider both together. I attempted to extend it to reflect the information you asked for, which I am pleased to learn was generally successful.

To assist in considering the SoCG further, I can confirm I have referred to the fatality of 2019 and also the Serious accident of July 2020 within my Proof, but the details I have are different to the text you suggest, as the fatality was to the south of the access, not at it, as you indicate. Similarly, the 2023 accident is not at the access but at the Long Drove junction to the south, and the 2020 accident is only around 30m to the north, not the 100m indicated in your text. When preparing my Proof I plotted the co-ordinates provided by Crashmap to check their locations. They should be the same as the data you have, but if they are different, please confirm. I have attached the actual Crashmap output information (which is not reproduced in my Proof). I have dealt with the 2019 fatality and 2020 serious accidents within my Proof as follows:

"There is reference within representations to the planning application from the Parish Council that "The site access is located on a bend with the national speed limit. There is extremely limited visibility for slowing and turning vehicles. It is a known accident hotspot (including fatalities)."

However, based on the Crashmap evidence, the fatality referred to was approximately 85m to the south of the Appeal Site access and involved a single vehicle accident when a driver travelling southbound ran into the bridge parapet immediately to the south of the Long Drove junction, resulting in fatal injuries to the passenger. The unfortunate and regrettable accident occurred in August 2019.

The nearest accident to the site access was in July 2020, when a single vehicle heading south crashed approximately 30m to the north of the Appeal Site access when negotiating the right-hand bend, resulting in serious injury. In both incidents, no other vehicles were recorded as being involved, which indicates they occurred as a result of driver error, rather than any specific defect in the road alignment. In both cases, weather conditions were fine and dry in daylight hours."

When I prepared the bulk of my Proof, Crashmap only provided information to the end of 2022, so I was unaware of the 2023 accident to the south you identified. However, I received an e-mail on 22nd January 2025 from Crashmap confirming the 2023 data had been released, so I have just accessed that and added a further paragraph to my Proof:

"A further recorded slight accident occurred in September 2023 at the junction with Long Drove to the south of the Appeal Site access, involving a light goods vehicle (3.5 tonnes maximum gross weight or under which was in the process of turning right when its front collided with the offside of a vehicle travelling along the road.

Given the differing characteristics of the recorded incidents and the extended period over which they have occurred, which is significantly longer than the standard, preferred 5 year assessment period, and taking into account the number of drivers who have successfully travelled along the road without crashing, it cannot be concluded that either the Appeal Site access or the road itself are inherently dangerous, or that the Appeal Site access is a known accident hotspot, as alleged.
Whilst all accidents are regrettable, the number of recorded incidents is not considered to be unusual and, given their circumstances, would not normally trigger remedial works to the highway alignment."

The reference to the significantly longer than normal period above is because in terms of the Appeal Site access itself, I have confirmed:

"I have reviewed the safety performance of the Appeal Site access by referring to Crashmap data, which confirms there have been no recorded personal injury accidents over the 25 year period 1999 to 2023 inclusive.

As is apparent from the Google Earth imagery from 1999 at Appendix JPH-A, there appears to have been activity at that time. The residential use of the mobile home would also result in traffic movements through the access.

In the event there is a particular feature of the local road network that results in compromised safety for its users, it is normal to find a number of incidents which share common characteristics within a relatively short period of time, with normal assessment periods being 3 years or the preferred 5 years."

The above text updates my previous text which referred to 24 years and 1999 to 2022 inclusive. I have attached the Crashmap output files for information.

On that basis, I do not feel it is necessary to include the accident details within the SoCG, but if you wish to retain reference to them, I have amended your suggested text to reflect the actual locations of the accidents, which can be confirmed by plotting the OS grid references. If you are content the above will address your concerns, we can delete the additional text and revert to that I originally drafted,

In terms of the speed data you prefer, it is normal to establish the speeds at either side of the access or junction unless the speeds are deemed to be constant, because it is when the oncoming driver can see the emerging vehicle and vice-versa that is important. This is because the emerging driver needs to judge whether it is safe to emerge, and the oncoming driver needs to react to it, potentially stopping if necessary, should the emerging vehicle stall. The speed at the access point is of no great assistance, because at that point it would be impossible to stop anyway. However, in this case, the difference in the southbound speeds between Site 1 (46.3 mph) and Site 2 (46.6 mph) is not particularly significant, and the northbound speed from Site 3 (54.6 mph) is higher than that at Site 2 (47.9 mph). I think you may have misread 46.6 as 48.8 for the southbound speed at Site 2. Based on the recorded 46.6 mph the calculated distance based on the 2s p/r and 0.375g deceleration rate is 100.640m.

In terms of the gradient point, DMRB does not require gradient corrections when designing for stopping, as there is enough slack in the parameters to account for that. This is apparent when looking at the deceleration lengths for right turn lanes etc in Table 5.22 of CD 123, which are based on the same 0.375g deceleration rate (as paragraph 7.41 of its predecessor TD 42/95 confirms – which has the same deceleration lengths for the various speeds and gradients as CD 123). Within Table 5.22 of CD 123 you will see on the section for down gradients, within each respective speed band, on single carriageway routes including ghost islands, there is no change in the deceleration length as the gradient varies from 0-4% and over 4%. A further consideration in this case is the gradient where the vehicles actually brake, as the speed is assumed to be constant during the 2s p/r phase until the driver actually reacts. At 46.3 mph, the actual braking distance after the distance travelled during the 2s p/r phase is 58.2m (rising to 59m at 46.6 mph). The notes I made on site indicate the road is fairly level for the initial 54m to the north of the access, at which point it begins to climb to the bridge. As a result, the braking distance would not be affected by gradient in practical terms. There is also the consideration that this calculation adopts the 2s p/r time, rather than

the faster 1.5 seconds, which is more realistic given the driver would have just negotiated the bridge and therefore be more alert then when cruising along a typical trunk road.

Notwithstanding this, the visibility splays measured on site extend at least 127m if taking the near edge measurement and 146m to the bridge in practical terms. As a result, none of the above actually matters as the visibility splays are significantly longer than are required. Given that, I have suggested deleting the additional text you added to point 7.

In terms of point 5, I do have not seen the Council's gritting records so cannot confirm your suggested text. However, I have no problem with the point you are trying to make, but have suggested amending the text to reflect the information you have provided.

I have attached a D4 SoCG with suggested revisions for your consideration, which I trust are acceptable in the event you wish to retain the extra information you added. However, I tend to find SoCGs that are shorter are welcomed by Inspectors and it may be that you agree some of the extra text is not required at all following consideration of the foregoing.

Should you wish to discuss the revisions so we can get this finalised, please do not hesitate to call. I may have to go out, so if I don't answer the landline, please try the mobile number, as I should be contactable on one or the other all day. If I don't answer the mobile, please leave a message and contact number and I will call you back as soon as I can.

Kind regards

Jeremy Hurlstone
The Hurlstone Partnership Limited
Tel: 01743 884849 or 07875 399325

From: Jon Finney <Jon.Finney@cambridgeshire.gov.uk>
Sent: 29 January 2025 17:02
To: Jeremy Hurlstone <jeremy@hurlstones.com>
Cc: 'Scrivener Dean' <Dean.Scrivener@greatercambridgeplanning.org>; Vanessa.Blane@3csharedservices.org; Helen Morris <helen.morris@gpsltd.co.uk>; gps appeals <appeals@gpsltd.co.uk>
Subject: RE: Chear Fen / Twentypence Road - 22/01703/FUL

Dear Jeremy,

Thank you for your Email re the above and for providing the draft Statement of Common Ground in connexion with reason for refusal 8.

Please find attached my edited version of the SoCG. As you will see I am suggesting that some paragraphs need to be expanded and that additional information needs to be provided.

In particular I feel that the recent collision data near to the access needs to be explored and discussed. While your paragraph may be grammatically correct, the fact that there have been two accidents, one regrettably fatal, at or very near the access needs to be acknowledged and addressed. You will note I have referenced an RTI dating to 2023, even though this occurred after the Decision Notice was issued, it would be preferable if this were also acknowledged in case parties with local knowledge (e.g. the Parish Council) are in attendance as they could raise this as an issue. I cannot share the data I have been provided re the RTI's as the assigned road safety factors are considered confidential by the police, I understand that these could be shared with the Planning Inspector for information only.

Collision data acceptable to the Local Highway Authority can be sourced through the option to self-serve the required data at no cost from the Cambridgeshire Road Traffic Collision Open Data Portal https://cambridgeshireinsight.org.uk/cambridgeshire-collision-data/ or you can make a chargeable request for the previous 60 months accident records for the study area together with an analysis of any trends or

clusters from: the Cambridgeshire County Council Research Group, Research.Group@cambridgeshire.gov.uk .

From my perspective the data gathered from site 2 is the only set that should be used to calculate the inter vehicle visibility splays, the resultant figures differ, so please recalculate the SSD including a % for the gradient (a relatively rare feature in Cambridgeshire).

Hopefully all my other comments etc., are clear, if not please do not hesitate to contact me.

Yours,

Jon
Jon Finney Ph.D., I.Eng., M.I.C.E.
Principal Development Management Engineer

My working days are Tuesday, Wednesday and Thursday

From: Jeremy Hurlstone <jeremy@hurlstones.com>
Sent: 28 January 2025 11:07
To: Jon Finney <Jon.Finney@cambridgeshire.gov.uk>
Cc: 'Scrivener Dean' <Dean.Scrivener@greatercambridgeplanning.org>; Vanessa.Blane@3csharedservices.org; Helen Morris <helen.morris@gpsltd.co.uk>; gps appeals <appeals@gpsltd.co.uk>
Subject: FW: Chear Fen / Twentypence Road - 22/01703/FUL

Dear Jon,

I hope you are well.

Further to my e-mail below, I have just been speaking with Green Planning Studio regarding the submission of evidence and was advised that my work only relates to one of the three appeals referenced at the top of the SoCG I previously sent. As you will be looking at this tomorrow, I thought I would send a corrected version, in the hope it may be OK and we can sign it off! Everything else is the same as the version I previously sent. I have just removed the Appeal Refs that don't end in 444 from the D3 version.

I trust this is OK and I look forward to hearing from you as soon as possible.

Kind regards

Jeremy Hurlstone
The Hurlstone Partnership Limited
Tel: 01743 884849 or 07875 399325

From: Jeremy Hurlstone
Sent: 22 January 2025 10:04
To: Jon Finney <Jon.Finney@cambridgeshire.gov.uk>
Cc: 'Scrivener Dean' <Dean.Scrivener@greatercambridgeplanning.org>; Vanessa.Blane@3csharedservices.org; Helen Morris <helen.morris@gpsltd.co.uk>; gps appeals <appeals@gpsltd.co.uk>
Subject: RE: Chear Fen / Twentypence Road - 22/01703/FUL

Dear Jon,

Firstly, apologies for the mis-spelling of your name in my initial e-mail below, which I just noticed!

Thanks for your e-mail.

The Highway Boundary information I have should have been the first pdf attachment to the e-mail that left here called “Jeremy Hurlstone”, as received from Clare Hobbs of Cambridgeshire Highways. I have attached it again in case it became corrupted or deleted in transit between us through the ether, as stranger things have happened.

I trust this is OK. However, should you have any queries, require any further information or wish to discuss the case, please do not hesitate to call.

Kind regards

Jeremy Hurlstone
The Hurlstone Partnership Limited
Tel: 01743 884849 or 07875 399325

From: Jon Finney <Jon.Finney@cambridgeshire.gov.uk>
Sent: 22 January 2025 09:01
To: Jeremy Hurlstone <jeremy@hurlstones.com>
Cc: 'Scrivener Dean' <Dean.Scrivener@greatercambridgeplanning.org>; Vanessa.Blane@3csharedservices.org; Helen Morris <helen.morris@gpsltd.co.uk>; gps appeals <appeals@gpsltd.co.uk>
Subject: RE: Chear Fen / Twentypence Road - 22/01703/FUL

Dear Jeremy,

Thank you for your Email re the above. I have set aside time on 29th Jan to review the information you have sent through.

You mention that you have a plan showing the extent of the adopted public highway in the vicinity of the site, this does not appear to have been included in the pack that was sent through, could you provide the same? I ask as there are various levels of information available from CCC’s Searches Team relating to the extent of the adopted public highway and it would of course be helpful if we were both discussing the same plan.

Many thanks,

Jon
Jon Finney Ph.D., I.Eng., M.I.C.E.
Principal Development Management Engineer

My working days are Tuesday, Wednesday and Thursday

From: Jeremy Hurlstone <jeremy@hurlstones.com>
Sent: 16 January 2025 12:44
To: Jon Finney <Jon.Finney@cambridgeshire.gov.uk>
Cc: 'Scrivener Dean' <Dean.Scrivener@greatercambridgeplanning.org>; Vanessa.Blane@3csharedservices.org; Helen Morris <helen.morris@gpsltd.co.uk>; gps appeals <appeals@gpsltd.co.uk>
Subject: RE: Chear Fen / Twentypence Road - 22/01703/FUL

Dear John,

Thank you for your e-mail. I understand the evidence is due to be exchanged at the end of the month, but the attached should be sufficient to allow you to consider acceptability without my full Proof and Appendices.

Hopefully, using the DMRB 2s p/r time and Absolute Minimum deceleration rate for stopping (0.375g as used when designing right turn lanes within which all traffic including HGVs is to stop safely), rather than the 0.25g which underpins the Desirable splays designed to maintain a constant speed, will not be a matter of dispute. Assuming it isn't a matter of dispute, given the speeds are already variable along the route, we should hopefully be able to sort this out.

To that end, I have attached:

The Highway Boundary Plan provided by the Council
The ATC Data, photographs and ATC Plan,
Figure 1 showing the visibility splays as I measured on site.
Two photos from the access showing the visibility splays
The 2nd Draft Highways SoCG, which I have expanded from the first I prepared (which assumed the full Proof had been read) to provide the relevant technical information in terms of the speeds, flows and visibility splays based upon them.

I trust this is helpful. However, please do not hesitate to contact me should you have any queries or wish to discuss anything related to it in order to progress / agree the Highways SoCG.

Kind regards

Jeremy Hurlstone
The Hurlstone Partnership Limited
Tel: 01743 884849 or 07875 399325

From: Jon Finney <Jon.Finney@cambridgeshire.gov.uk>
Sent: 15 January 2025 17:49
To: Jeremy Hurlstone <jeremy@hurlstones.com>
Cc: 'Scrivener Dean' <Dean.Scrivener@greatercambridgeplanning.org>; Vanessa.Blane@3csharedservices.org
Subject: RE: Chear Fen / Twentypence Road - 22/01703/FUL

Dear Jeremy,

Thank you for your Email re the above.

If you could send me a draft of you proposed statement of common ground, including the speed and volume data I will be more than happy to review the same so we can agree areas where there is no dispute between us.

Once I have the above, I will be happy to have a Teams meeting to discuss further if needed.

Yours,

Jon
Jon Finney Ph.D., I.Eng., M.I.C.E.
Principal Development Management Engineer

My working days are Tuesday, Wednesday and Thursday

From: Jeremy Hurlstone <jeremy@hurlstones.com>
Sent: 14 January 2025 16:37
To: Jon Finney <Jon.Finney@cambridgeshire.gov.uk>
Subject: Chear Fen / Twentypence Road - 22/01703/FUL

Dear Jon,

I just called the Council in an attempt to speak with Victoria Keppey, who was the responding officer to this application, with whom I had some limited e-mail correspondence a couple of years ago, to which you were copied in. I am the Highways Consultant appointed by the Appellants and am hopeful that we may be able to resolve this by Statement of Common Ground, once you have considered the evidence I have prepared, with speed data etc.

The switchboard confirmed you were still working at the Council and may be able to confirm who is dealing with the upcoming appeals relating to the site on behalf of the Highway Authority, if it isn't you.

I would be grateful if you would give me a call to discuss. It is probably best to try the mobile (07875 399325) as I am in and out of the office for the next couple of days. If I don't answer, please leave a message and a contact number, and I will call you back as soon as I can.

Kind regards

Jeremy Hurlstone
The Hurlstone Partnership Limited
Tel: 01743 884849 or 07875 399325

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Twenty Pence Road, Cottenham
CB24 8AH - ATC Locations
CB24 8AH
ATC Telegraph Pole
ATC Chevron Board
ATC Bends Sign
N
200 m
Google Earth

APPEAL BY MESSRS PRICE & BALL, LAND SOUTH OF CHEAR FEN BOAT CLUB, TWENTYPENCE ROAD, COTTENHAM, CAMBS, CB24 8AH
APPEAL REFS: APP/W0530/W/22/3308444

LPA REF: 22/01703/FUL

STATEMENT OF COMMON GROUND ON HIGHWAY MATTERS BETWEEN MR JEREMY P. HURLSTONE OF THE HURLSTONE PARTNERSHIP LIMITED (ON BEHALF OF THE APPELLANTS) AND DR JON FINNEY OF CAMBRIDGESHIRE COUNTY COUNCIL (AS HIGHWAY AUTHORITY)

IN TERMS OF HIGHWAY MATTERS IT IS AGREED BETWEEN THE PARTIES THAT:-

1. The proposed development would be served by an existing access to Twentypence Road, which has served the Appeal Site for decades.

2. The existing access has a good safety record with no recorded personal injury accidents involving vehicles turning between it and Twentypence Road between 1999 and 2022 inclusive. From the County Council records there have been two personal injury accidents in the immediate vicinity of the access ref: 873413 date 30-08-19 this was a fatal incident (shown at the access) and 972079 date 17-07-20 (shown on the bridge approx. 100m from access i.e. with the proposed inter vehicle visibility splays), also in 2023 1358769 occurred at the access. These need to be detailed and discussed.

3. At the planning application stage, the Highway Authority raised concerns regarding the impact of the proposed development on highway safety due to potential delays to through-traffic travelling along Twentypence Road and a visibility provision below its default 215m requirement for a 60 mph road, which had not been justified with empirical traffic survey and speed data. The Highway Authority's comments made it clear that if empirical data were submitted that interpolation of the inter vehicle visibility splays would be acceptable.

4. Data from ATC counters to the north and south of the Appeal Site access confirmed approach speeds of 46.3 mph southbound (from ATC Site 1) and 54.6 mph northbound (from ATC Site 3). Speed data at Site 2, near the access itself, revealed speeds of 47.9 mph northbound and 46.8 mph southbound, which demonstrates the speeds are variable and not constant in the vicinity of the Appeal Site and its visibility splays. From the perspective of the Highway Authority the data gathered at Site 2 (the site access) provide the most robust results for determining the required inter vehicle visibility splays.

5. The ATC data were collected between 9th January and 15th January 2023. This is during the winter maintenance period in Cambridgeshire. While the overnight temperatures fell close to freezing no gritting runs were called during this period. Given this the speeds at which motor vehicles traversed the road are likely to be representative of a normal range

6. Daily traffic flows varied between 1959 and 5194 vehicles across the three count sites, with averages of 4149, 4184 and 4157 vehicles at Sites 1 to 3 respectively.

7. Based on the DMRB parameters for stopping (2 seconds perception/reaction time and 0.375g deceleration rate) for speeds above 60 kph as detailed in MfS2 Table 10.1, the calculated stopping distances are 99.623m to the right (north) and 129.788m to the left (south). The Highway Authority will accept the data collected from site 2 only, as the others are too distant to be applicable. Using an 85% speed of 48.8mph (78.5kph) I calculate the SSD to the north of the site access to be 110.1m though no measurement of gradient has been included and given this length is on the downward embankment of the bridge this should be included.

8. The visibility splays measured on-site from the 2.4m set-back extend 127.1m to the right /north along the roadside edge of the opposing fence, but in practical terms extend 146m within the Highway Boundary due to the local topography, and 503.5m to the left / south.

9. Capacity assessments undertaken at the access reveal a maximum Ratio of Flow to Capacity of 0.063 with maximum queues of 0.1 vehicles and inclusive delays of up to 0.18 minutes per vehicle, all of which occur on the outbound movement from the site, confirming capacity and delay is not a constraint in this case.

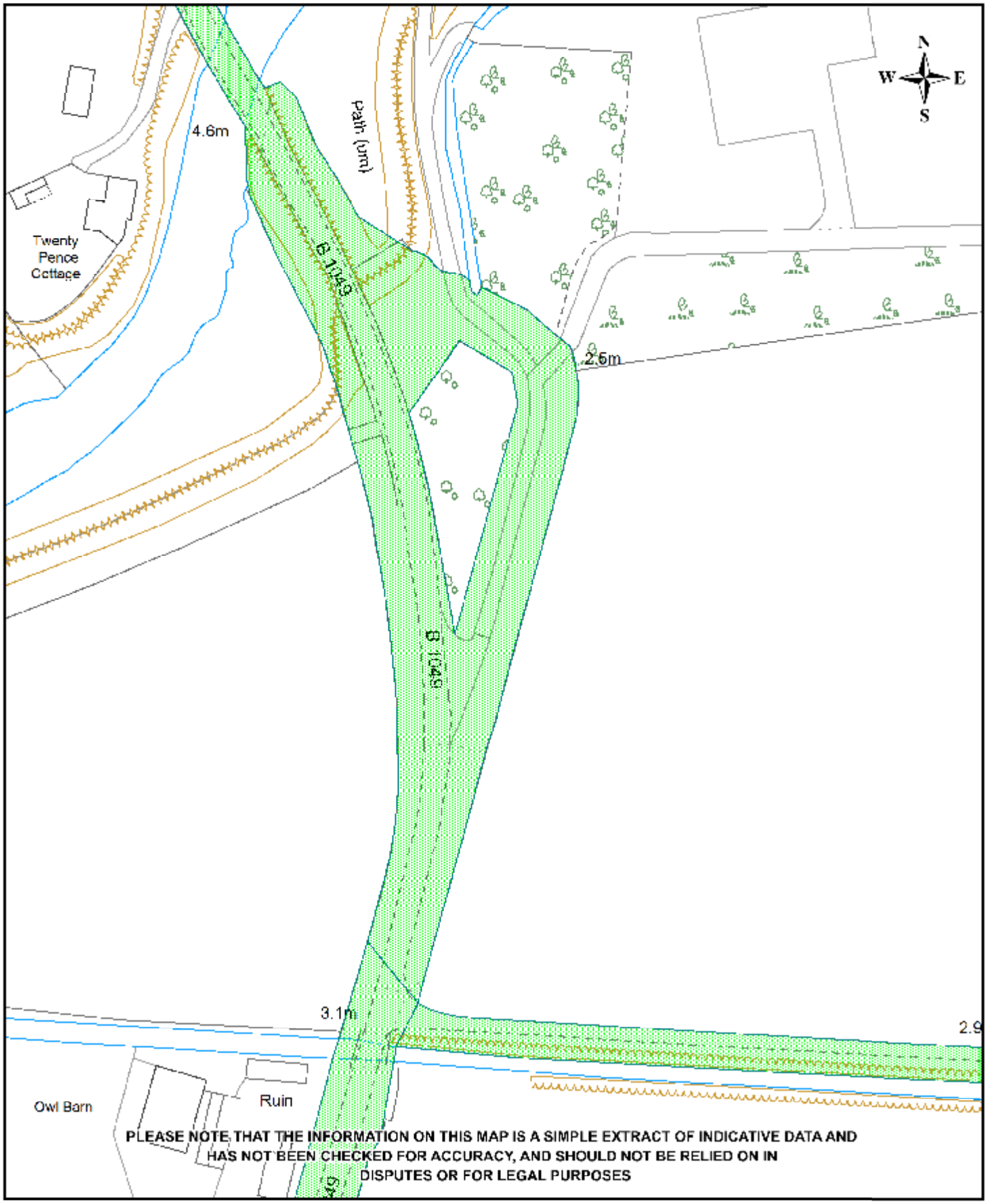
10. The information and plans provided within Mr. Hurlstone's Proof of Evidence and its Appendices demonstrate that visibility at the Appeal Site access is acceptable. Therefore, the proposed access will operate within the reasonable range of risks and hazards that a user of the highway should be prepared to encounter while traveling. The impact of turning traffic at the access, ~~which~~ would also not lead to significant delays to through-traffic travelling along Twentypence Road.

11. Having considered the foregoing, the additional information provided within the Proof of Evidence, satisfactory vehicular access has been demonstrated and confirmed. Therefore, reason for refusal 8 is not contested and may be considered withdrawn from the Appeal proceedings.

12. As a result of this agreement, unless specifically requested by the Inspector or Local Authority, it is not anticipated that either of the undersigned will attend the Inquiry to give further evidence on these matters.

Signed:	Signed:
J P Hurlstone	J Finney
Date:	Date:

Cambridgeshire County Council



PLEASE NOTE THAT THE INFORMATION ON THIS MAP IS A SIMPLE EXTRACT OF INDICATIVE DATA AND HAS NOT BEEN CHECKED FOR ACCURACY, AND SHOULD NOT BE RELIED ON IN DISPUTES OR FOR LEGAL PURPOSES

Scale: 1:1250
Date: 02/03/2023
Ref: Jeremy Hurlstone - CH

Legend

- Public highway (green)
- Public highway (blue)
- Public highway (red)

Highway boundary plans are determined using Ordnance Survey (OS) mapping at a scale of 1:1250 or 1:2500. Please refer to OS's Statement of Accuracy when comparing with a site survey. It is possible that the OS mapping for the area searched does not show features that typically form part of the highway boundary, such as (but not limited to) ditches, hedges, fences or embankments. Therefore, please note that owing to the tolerance of accuracy that must be applied to OS maps, the highway boundary 'on the ground' may not be in exactly the same position as the boundary features displayed by OS. If you require a site visit to determine the physical highway extent please contact searches@cambridgeshire.gov.uk. This service is provided on a cost-recoverable basis in accordance with our Schedule of Charges.

APPEAL BY MESSRS PRICE & BALL, LAND SOUTH OF CHEAR FEN BOAT CLUB, TWENTYPENCE ROAD, COTTENHAM, CAMBS, CB24 8AH
APPEAL REFS: APP/W0530/C/22/3308447, APP/W0530/W/22/3308444 & APP/W0530/X/22/3308443

LPA REF: 22/01703/FUL

STATEMENT OF COMMON GROUND ON HIGHWAY MATTERS BETWEEN MR JEREMY P. HURLSTONE OF THE HURLSTONE PARTNERSHIP LIMITED (ON BEHALF OF THE APPELLANTS) AND MR JON FINNEY OF CAMBRIDGESHIRE COUNTY COUNCIL (AS HIGHWAY AUTHORITY)

IN TERMS OF HIGHWAY MATTERS IT IS AGREED BETWEEN THE PARTIES THAT:-

1. The proposed development would be served by an existing access to Twentypence Road, which has served the Appeal Site for decades.

2. The existing access has a good safety record with no recorded personal injury accidents involving vehicles turning between it and Twentypence Road between 1999 and 2022 inclusive.

3. At the planning application stage, the Highway Authority raised concerns regarding the impact of the proposed development on highway safety due to potential delays to through-traffic travelling along Twentypence Road and a visibility provision below its default 215m requirement for a 60 mph road, which had not been justified with empirical traffic survey and speed data.

4. Data from ATC counters to the north and south of the Appeal Site access confirmed approach speeds of 46.3 mph southbound (from ATC Site 1) and 54.6 mph northbound (from ATC Site 3). Speed data at Site 2, near the access itself, revealed speeds of 47.9 mph northbound and 46.8 mph southbound, which demonstrates the speeds are variable and not constant in the vicinity of the Appeal Site and its visibility splays.

5. Daily traffic flows varied between 1959 and 5194 vehicles across the three count sites, with averages of 4149, 4184 and 4157 vehicles at Sites 1 to 3 respectively.

6. Based on the DMRB parameters for stopping (2 seconds perception/reaction time and 0.375g deceleration rate) for speeds above 60 kph as detailed in MfS2 Table 10.1, the calculated stopping distances are 99.623m to the right (north) and 129.788m to the left (south).

7. The visibility splays measured on-site from the 2.4m set-back extend 127.1m to the right /north along the roadside edge of the opposing fence, but in practical terms extend 146m within the Highway Boundary due to the local topography, and 503.5m to the left / south.

8. Capacity assessments undertaken at the access reveal a maximum Ratio of Flow to Capacity of 0.063 with maximum queues of 0.1 vehicles and inclusive delays of up to 0.18 minutes per vehicle, all of

which occur on the outbound movement from the site, confirming capacity and delay is not a constraint in this case.

9. The information and plans provided within Mr. Hurlstone's Proof of Evidence and its Appendices demonstrate that visibility at the Appeal Site access is acceptable, as is the impact of turning traffic at the access, which would not lead to significant delays to through-traffic travelling along Twentypence Road.

10. Having considered the foregoing, the additional information provided within the Proof of Evidence, satisfactory vehicular access has been demonstrated and confirmed. Therefore, reason for refusal 8 is not contested and may be considered withdrawn from the Appeal proceedings.

11. As a result of this agreement, unless specifically requested by the Inspector or Local Authority, it is not anticipated that either of the undersigned will attend the Inquiry to give further evidence on these matters.

Signed:	Signed:
J P Hurlstone	J Finney
Date:	Date: