

Erection of dwellinghouse and associated work. Land South Of Ebbastrand, Coldingham Sands, Coldingham. 22/01357/FUL

Response to Scottish Borders Council application refusal

1. Introduction

Sweco was commissioned by Mr Rob Cameron to prepare a response to the Scottish Borders Council (SBC) refusal on an application for a private dwelling on the land south of Ebbastrand, Coldingham Sands (22/01357/FUL). The transport related reasons for refusal with the Decision Notice was as follows:

“The proposed erection of a dwellinghouse at this location would be contrary to Local Development Plan 2016 policy PMD2 (Quality Standards) criterion (Q) in that the additional traffic generated by the development would have an adverse impact on road safety. The section of road between St Veda’s House and the application site is considered incapable of accommodating such further traffic. In particular, the lack of forward visibility at a blind corner outside St Veda’s House results in vehicles meeting on a narrow section of road with the need for one vehicle to reverse to the detriment of road and pedestrian safety.”

This response to SBC comments provides additional information as well as reiterating points made in the initial correspondence sent in November 2022. The following points have been covered:

- Additional Traffic generated.
- Road Safety; and
- Road layout.

2. Additional Traffic Generated

Within the Officers Report it is stated:

“The Service considers the section of road between St Veda’s and the application site to be incapable of accommodating the further traffic that would be generated by the proposed development. The Service describes the section of road in question to be narrow and tortuous. The Service is particularly concerned at the blind corner at St Vedas. This can be a busy area, particularly in summer, as this is the main route for those accessing the beach.”

The Council have proposed that the level of traffic generated will be a road safety issue. To determine the predicted uplift in vehicular trips reference was made to the TRICS database.

The trip generation for a single private residential dwelling for the morning and evening peaks are shown in **Table 1**.

	Morning two-way trips	Evening two-way trips
Per home	0.47	0.46

Table 1. Residential vehicle trip generation

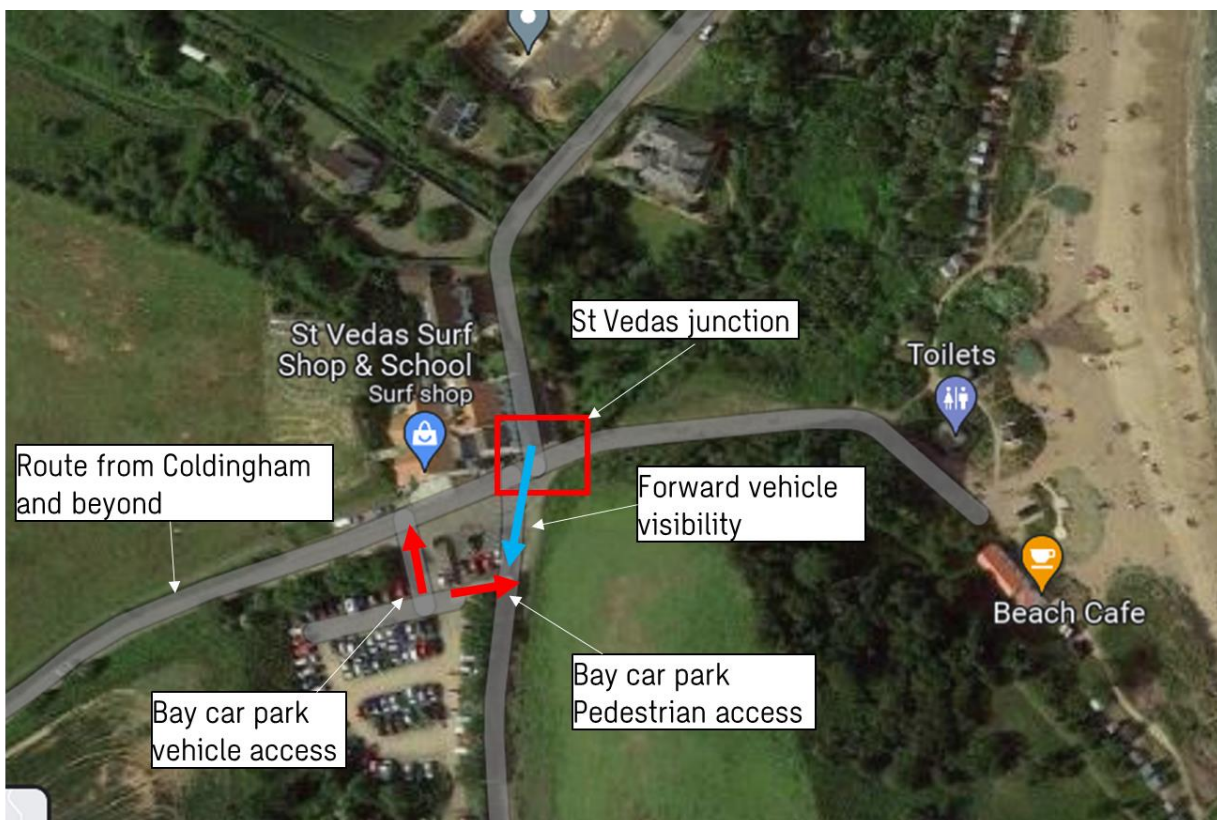
As demonstrated in **Table 1**, and as set out in the original supporting statement, the predicted uplift in trips is at maximum one during the morning and evening peak hour. An additional car will neither create nor exacerbate any potential issue relating to road safety. It should also be noted that these times are not the busiest times for visitors to Coldingham.

Currently, there are 25 homes located on the road in question, giving a typical two-way traffic volume of 12 vehicle movements in each of the morning and evening peaks. An additional car would make these

13 two-way trips, averaging a volume of one car movement every five minutes. This is an extremely low level of traffic, with the potential increase of a single vehicular trip being negligible.

The above estimate of existing traffic on the road should also be taken in the context of many of the other properties being holiday accommodation, therefore days of the week / times of the year they will generate no trips whatsoever.

Regarding the trips generated during the summer seasons for the bay, it is worth noting the bay car park is accessed further west than the St Vedas junction, so will therefore not produce any opposing vehicles at the junction. The pedestrian access to the car park exits onto the lane to the east. The forward visibility at the St Vedas junction will allow for vehicles to see the pedestrians travelling to and from the car park. This is illustrated in **Figure 1**.



3. Road Safety

In relation to road safety in the area, the Officers Report states:

“The additional traffic generated by the development would have an adverse impact on road safety”.

Within the original transport response, it was outlined that there has been no accidents on the surrounding road network in the past five years based on data gathered from Crashmap. Meaning the road currently operates with no safety concerns. The Council have responded to this with the following statement:

“Whilst the information from 'Crashmap' is useful, it does not mean there have been no accidents on this stretch of road in the past, nor does it mean there would not be any in the future.”

Any suggestion of accidents not recorded on Crashmap are purely speculative and cannot form basis for an objection. Any refusal should be evidence based, and the evidence indicates there is no road safety issue on any of the surrounding roads or at the St Vedas junction.

As set out in various applications and consultation responses over recent time, the road serving the site has experienced a change in the level of demand. Recent examples include the development at The Bay, where an 18-bed care home was replaced with eight luxury apartments (13/00299/FUL), and Dunlaverock guest house returning a private dwelling. Both these examples would have caused a net decrease in traffic demand off the road network. As the accident record shows, the roads could safely accommodate the level of vehicles when the demand was higher and there are no areas of concern.

The impact on road safety from the increase in traffic from a single dwelling on a road network which enforces low speeds through its geometry leading to the site, cannot be considered as a valid reason to object to the proposals

4. Road Layout

Within the Officers Report it is stated:

“The section of road between St Veda's House and the application site is considered incapable of accommodating such further traffic. In particular, the lack of forward visibility at a blind corner outside St Veda's House results in vehicles meeting on a narrow section of road with the need for one vehicle to reverse to the detriment of road and pedestrian safety.”

The section of road leading from the St. Vedas Hotel is relatively inconspicuous and not an obvious continuation of the main road. It is signed as No Through Road for Vehicular Traffic, with further signage indicating that there is No Turing Area Ahead. The section of road serving the site therefore only ever likely to be used by vehicles requiring access to one of the properties thereon and is conducive to a low-speed environment. Although there is restricted visibility at the St Vedas junction, there is no evidence that this has been or will be an issue.

There is also no evidence that reversing is common practice on this road and given the very low predicted vehicle demand, is anticipated to only occur in isolated cases. The Roads response should not be based on 'hearsay' but should however be based on factual evidence.

The road layout that is in place will encourage slow vehicle speeds through the following existing features:

- Street Dimensions / width.
- Limited forward visibility.
- Changes in priority; and
- Physical Features.

5. Conclusions

To conclude, there is no road safety or capacity issue with the existing road from St Vedas to the site. The road layout aligns to the overarching principles set out within national planning policy, designing streets, and the nature is conducive to a low speed.

It is considered that there is no factual or measurable basis to refuse the application on the grounds of road geometry, road capacity, or road safety.