

# North West Cardiff Group

Responding to the concerns of our communities

Creigiau    Danescourt    Gwaelod y Garth    Llandaff    Pentyrch    Radyr & Morganstown    St Fagans

Amanda Sutcliffe  
Development Control  
Cardiff Council  
**By email**

Old Church Rooms  
Park Road  
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Cardiff CF15 8DF

November 9, 2015

Dear Amanda,

## **Re: 14/02157/MJR : NORTH AND SOUTH OF LLANTRISANT ROAD**

1. This is the response from NWCG on the yet further information received on the above application. Our previous responses dated November 6 2014 and October 8 2015 still stand.
2. We **OBJECT** to the minor amendments proposed to this application as not being sufficient to deal with the road safety issues raised. We are disappointed at the cavalier attitude displayed in the Designer's Response and consider that the deficiencies of the access arrangements have not been adequately addressed in their "further amendments", and that this alone merits refusal of this application.
3. We note the site visits for the Designer's Road Safety Audit (RSA) were undertaken on **SUNDAY 28 June** with a further visit on Monday 12 October. No times are given and it is not clear that it takes account of what happens in the morning peak period, particularly on school days. We are skeptical that these visits could give a representative picture of existing conditions.
4. The Designer's calculations of future traffic flows assume a 50/50 modal split and are thus predicated on un-achievably low traffic volumes. The road system will undoubtedly need to cope with higher traffic year on year in the absence of reasonable alternatives for the multi-car-owning families likely to occupy the houses proposed. The aspiration to deliver shops and a junior school on or adjacent to the south western half of the site is laudable, but from bitter experience we know that despite the promises the reality will be different. This has been demonstrated in the three recent developments in Radyr & Morganstown which provided **NO** community or education facilities despite these being specified in S106 agreements.
5. The Designer's Response, which underpins this amendment, dismisses concerns about pedestrian and cyclist safety and relies on driver-responsibility. Statistics show that such faith is mis-placed as driver-error is still a major factor in road traffic accidents.
6. **Dwrg. SK101** Shows a 2-way side road with carriageway lane widths of only 2.75m at the Junction. These should be at least 3.0m to accommodate 2-way turning traffic without interference with each other's road space.
7. **Dwrg. SK102** Shows a 2.0m wide discontinuous footway on the South side of Llantrisant Road. The standard footway width adopted by most Welsh Councils is 2.4m, so this idea is substandard. Whatever width it is, it must be continuous. This is a route many children from the development would have to take to reach the Bishop of Llandaff High School. It also provides a slip lane downhill leading straight out onto Llantrisant Road.
8. **Dwrg. SK104/5** These show each traffic lane approaching the signalized junction on Llantrisant Road to be 3m wide, which is appropriate. The length of the outbound right turn lane is inadequate to accommodate current circumstances on school-day mornings when the queue to turn right sometimes extends back almost to the petrol filling station. The present junction arrangement with a

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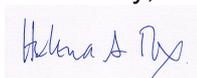
roundabout gives precedent to this right turning traffic, which then often clogs up the junction because of the queue to proceed up Heol Isaf towards the school. Imposing traffic signals on this junction will change this priority and make it far more difficult for this outbound traffic to turn right. The result of this will be to considerably lengthen the queue of traffic waiting to turn right, which will in turn prevent all other outbound traffic from proceeding. In other words, this junction will continue to be clogged up on school-day mornings after this proposed alteration.

- a. The queue to go up Heol Isaf on school-day mornings could be eased if a 3m wide right turn lane could be provided in front of the school. It would perhaps be a good idea if this could be incorporated into the proposed development scheme.
  - b. Away from the junction, the carriageway widths of Llantrisant Road are not dimensioned. They should each be 3.65m wide. The bus lane is shown as being only 3m wide, which is inadequate. This should also be 3.65m wide.
  - c. A 3m wide right turn lane should also be provided for traffic wishing to enter the petrol filling station.
9. **SK106** Shows inadequate forward visibility for outbound traffic on Llantrisant Road when approaching the new minor road junction on its south side. This is because the retained hedge-line will provide a blind approach.
- a. The off-centre design of this minor road junction's roundabout is inappropriate. The basic principle of roundabout design is to introduce deflection in the direction of traffic flow to reduce speed. Traffic entering the roundabout should encounter a greater degree of deflection than when leaving it. As designed, this roundabout offers no deflection to inbound traffic on Llantrisant Road, but for outbound traffic the degree of deflection is so great that large vehicles will have difficulty negotiating it. Another standard requirement of roundabout design is to provide two carriageway lanes on each approach to the roundabout. These second lanes are missing.
  - b. The position of the pedestrian/cycle crossing point which is adjacent to the footway into Heol Arudur, Danescourt should be relocated. It is dangerous to cross Llantrisant Road at this point because of the lack of visibility in either direction when on the southern side of Llantrisant Road, which will continue to be caused by the retained hedge-line.
10. **SK108** Shows that Llantrisant Road will have only a single 2-way carriageway of 6.0m width. This will be inadequate for the whole length of Llantrisant Road to be affected by this development proposal and needs to be altered to 7.3m to accommodate current traffic levels safely. Provision should also be made to allow future widening when/if further development to the West is allowed.
- a. (When Danescourt was developed, its boundary with Llantrisant Road was set back, presumably to accommodate some future road-widening scheme. This has never happened, but this is perhaps what is required for the frontages of this new development proposal to provide for the future. It could be said that this is what planning should be about, not just accommodating the desires of developers which is what seems to happen).
11. We make the following comments on the proposed traffic signals at the Llantrisant Road/Heol Isaf/Site Access junctions:
- a. The proposed layout, the forecasted flows and Linsig outputs suggest that the junction and Llantrisant Road will be considerably overloaded. On this alone, the proposed layout should be rejected by Cardiff Council.
  - b. We note a number of discrepancies in the Vectos documents, eg inconsistent phase letters, which suggest that the submissions have not been vigorously checked.
  - c. The data supplied by Vectos assumes a free flowing junction at all times. The junction is already overloaded with traffic and seizes up almost each school day morning until about 8.30am. The submitted proposals will not make any difference to this situation and the junction in its new form will continue to fail to operate as intended until after 8.30am on these

days.

- d. Vectos' use of the term 'scenario' is vague and confusing.
  - e. The application refers to traffic flows for a small development within the site, producing 73 vph out during the am and 78vph in during the pm. The proposed site access road has 3 exit lanes and is, obviously, designed for much greater flows. If it is intended that this be the main access for a large development, then much greater flows should be used.
  - f. No NMU data has been provided therefore it is not possible to comment on the suitability of provisions nor the assumption that the pedestrian stage would be called every other cycle.
  - g. Some of the 'desire' flows on Llantrisant Road are in excess of its link capacity. There are bottlenecks elsewhere which already prevent the link capacity being achieved.
  - h. In the Linsig morning peak output, as well as saturation flow excesses, the eastbound queue length on Llantrisant Road was automatically highlighted. Because of the way Linsig simplifies the prediction of queue lengths, it can grossly underestimate long queues. Using the Linsig output, and correcting for end of red, vertical queues, we estimate that the queue could be 750m long and result in 6 minutes delay. Where is the evidence that this has been taken account of by Vectos or the Council?
  - i. During the evening peak, the merging bottleneck on the westbound exit was not taken into account. Every other cycle there will be a long green. The entry storage capacity greatly exceeds the combined exit storage and merge capacity. The advancing platoon will be blocked and held back upstream of the stop line. This will severely reduce the entry capacity of Llantrisant Road and partially block the following stage, Heol Isaf. That will extend the queue of right turners from Heol Isaf, blocking its left turners.
  - j. The junction design makes no allowance for the limited accuracies of demand and capacity prediction. That is not good practice.
  - k. The squaring up of Heol Isaf will only result in an effective approach angle increase to a substandard angle of about 45 degrees.
  - l. Unless the right turning lane in Heol Isaf can be secured for Radyr Comprehensive School, then Cardiff should reject this application on the grounds that the traffic proposals will not work.
12. A previous traffic analysis published by Cardiff Council showed that if the junction at Western Avenue was to continue to function satisfactorily, all inbound traffic on Llantrisant Road would have to turn right at Waterhall Road and to then proceed through Fairwater. This development makes no reference or provision for this to happen. Cardiff has a statutory obligation to facilitate the flow of traffic on its highway network, but if it allows this development proposal, it will experience a worsening of conditions. If this development is allowed, it will represent yet another example of Cardiff Council failing to plan for the future as it should.
13. We hope that our detailed comments will, at the very least, demonstrate the need to check this application and the Vectos documents with great care. This development should only proceed on the basis of testable evidence so that your Traffic Engineers can be confident that the proposals include necessary protection for the public from the impact of this proposed development.
14. Until that is done, this application should not be approved.

Yours truly,



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On behalf of NWCG

cc Mark Drakeford, AM; Kevin Brennan, MP