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Peter Evans Partnership
**Transport Planning
& Highway Consultants**

Land at Ridgeway Lane & Lower Pennington Lane, Lymington

PALLS

Transport Review of Site and Planning
Allocation

December 2020

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Peter Evans Partnership

Transport Planning & Highway Consultants

ANDREW KENYON, DIRECTOR, PETER EVANS PARTNERSHIP

EXPERIENCE

This report was prepared by Andrew Kenyon based on a site visit, review of the Local Plan and the evidence submitting to the Local Plan Inquiry on behalf of the landowner/potential applicant and the objectors.

Andrew is a fellow of the Chartered Institution of Highways and Transportation and a Director of Peter Evans Partnership Ltd. He also holds an Honours Degree in Civil and Structural Engineering.

Since graduating in 1985 he has specialised in transportation, traffic, and highway related matters on development projects. On graduation he joined Alex Boreham Consulting Engineers, a specialist highway and traffic consultancy based in Essex. Following this Andrew worked for Travers Morgan, now Capita, a multi-disciplinary civil engineering consultancy.

Andrew has been a Director of Peter Evans Partnership since 2002, a specialist transport planning and traffic engineering consultancy founded in 1983. The practice advises local authorities as well as national and local private clients at the planning, conceptual and design stages of development projects.

Andrew has worked on a wide range projects throughout the country over many years including residential, commercial, and leisure development projects in the Hampshire area. Recent projects have included reviewing sites such as Lymington as part of a due diligence process prior to purchase. He has also regularly prepared and given evidence at Public Inquiries.

8th December 2020

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LAND AT RIDGEWAY LANE & LOWER PENNINGTON LANE, LYMINGTON

TRANSPORT REVIEW OF SITE AND PLANNING ALLOCATION

1.0 INTRODUCTION

- 1.1 PEP has been appointed by PALLS to undertake an independent review of the residential scheme proposals at Ridgeway Lane and Lower Pennington Lane, Lymington from a highways and transportation perspective.
- 1.2 The New Forest District Local Plan 2016-2036 Part 1: Planning Strategy was adopted by the Council in July 2020. The site is identified on the policies map as a development site and forms Strategic Site 6: Land to the east of Lower Pennington Lane, Lymington. In summary, and relevant to this review, the policy and accompanying text states:
- at least 100 homes and public open space;
 - retain and enhance the rights of way across the site;
 - integrate the site into the built-up area, connecting to footpaths to central Lymington, Woodside Park and the countryside. Main pedestrian links via Woodside Lane and Forest Gate Gardens;
 - provide vehicle access from both Lower Pennington Lane and Ridgeway Lane, providing a through route across the site. Visibility and safety at the Ridgeway Lane access to be addressed;
 - additional parking for the adjacent Oakhaven Hospice.
- 1.3 In a letter dated 14th April 2020 Hampshire County Council, as local Highway Authority, confirmed that the highways and transport suitability of the site would be subject to consideration as part of a planning application.
- 1.4 A site visit was undertaken as part of the review we have undertaken. We have reviewed the Transport Assessment by RGP, dated September 2018, that was prepared to inform the Local Plan allocation proposals for the site. As far as we are aware no transport or highways matters in terms of the allocation were agreed with Hampshire County Council as part of work submitted by RGP and this is confirmed in the letter dated 14th April 2020 referred to above.

2.0 TRANSPORT REVIEW

2.1 Summary

2.1.1 From our review the key issues that are insufficiently addressed and should be considered further are:

1. Whether the pedestrian access to the site is appropriate;
2. Suitability of Ridgeway Lane and Lower Pennington Lane for increased cycle and vehicle traffic and associated safety concerns;
3. Suitability of vehicle through route between Ridgeway Lane and Lower Pennington Lane and potential to encourage an increase in traffic on Poles Lane;
4. The Ridgeway Lane access proposals and the implications of the highway improvements on trees/hedgerow and the New Forest National Park;
5. Whether the development layout design and access means that car use is more attractive than other modes;
6. Safety concerns at the Lower Pennington Lane / Ridgeway Lane junction;
7. Suitability of the pedestrian crossing and cycle facilities at the A337 roundabout on safety grounds; and
8. Whether the junction capacity improvements proposed for the A337 are adequate.

2.1.2 As part of our review we have also considered whether the proposals accord with the key transport tests of the National Planning Policy Framework June 2019 update including:

- suitable site accessibility by all modes of transport;
- if a safe and suitable access can be achieved for all users; and
- what is the safety and cumulative transport impact of the development, and is this 'severe'.

2.2 1) Suitability of Pedestrian Access

Considerations

2.2.1 To assess the suitability of pedestrian access for a residential development a number of matters need to be considered. This includes:

- the distance to local facilities;
- directness of the route;
- availability of footpaths/footways;
- traffic speeds and congestion;
- the attractiveness and quality of the route;
- safety concerns because of lack of being overlooked;
- street lighting; and
- safety concerns because of major road crossing.

Proposals

- 2.2.2 The pedestrian access to the scheme is via footpath and footway connections, either on to Lower Pennington Lane or Ridgeway Lane direct or via the shared surface street of Forest Gate Gardens which in turn meets Ridgeway Lane to the north. However no footway is provided on Ridgeway Lane adjacent to the site or on Lower Pennington Lane.
- 2.2.3 To address the lack of footway the missing section of footway on Ridgeway Lane north of Forest Gate Gardens is proposed as part of the scheme and could address some of the pedestrian accessibility concerns. However there is no requirement for this in the allocation policy.
- 2.2.4 As a result of the footway provision proposed there would be an impact on the ditch along the western side of Ridgeway Lane and on the adjacent trees. There is clearly some doubt that that this improvement can be achieved, as it otherwise would likely have been implemented as part of the Forest Gate Gardens scheme.

Review

- 2.2.5 The site is within appropriate pedestrian accessibility distances of the local parade of shops on the A337 and schools to the west of the A337 and north of North Street. Bus stops are also provided along the A337. However, these pedestrian routes are not suitable, particularly for school children, and are unlikely to be used because of safety concerns.
- 2.2.6 If a footway is to be provided on Ridgeway Lane this does not address the issue of the poor street lighting along the first section of this route. Much of the walking route along Ridgeway Lane is not overlooked and therefore this also raises concerns over personal safety and would also discourage walking trips especially after sunset.
- 2.2.7 Even if the footway along Ridgeway Lane can be provided the desire line to local shops and bus stops from all of the site, and local schools for some of the site, would be via Lower Pennington Lane. Lower Pennington Lane is a poorly lit country lane with no footway provision. Whilst there are a few more properties fronting the lane, due to large plot sizes, these are set back and therefore the lane is not well overlooked so again raises the concern of the secluded nature of the route and of associated perceived personal safety.
- 2.2.8 The 85th percentile vehicle speeds along the section of Lower Pennington Lane in which residents would walk were identified in the Transport Assessment as 25.5mph northbound and 27.1mph southbound. Shared space streets whereby pedestrians and vehicles share the road space would typically only be encouraged where speeds are at or lower than 20mph. This route along Lower Pennington Lane would not meet the requirements of providing a safe and suitable access for all users or a safe route to school.

- 2.2.9 Once pedestrians reach the A337 from either Lower Pennington Lane or Ridgeway Lane there are no controlled pedestrian crossing points to enable residents to reach the local facilities which are all to the north/north west of the A road. The A337 is busy at most times of the day. This therefore causes a barrier to walking to these local facilities and would increase the propensity to drive. This is also considered later in this note.
- 2.2.10 Therefore in conclusion because a suitable site access for pedestrians is not provided and off site accessibility for pedestrians to local facilities is poor the aims of NPPF are not achieved.

2.3 2) Suitability of Ridgeway Lane & Lower Pennington Lane

Considerations

- 2.3.1 To consider the suitability of Ridgeway Lane and Lower Pennington Lane for increased cycle and vehicle traffic the matters that need to be considered are:
- the traffic increase in comparison with the existing flows;
 - the width of the existing road and suitability for traffic using the route;
 - speed of traffic;
 - accident statistics;
 - street lighting; and
 - the level of HGV traffic during construction and conflicts with existing road users.

Proposals

- 2.3.2 No cycleway provision is proposed as part of the scheme proposals to date.
- 2.3.3 A small section of footway is proposed on Ridgeway Lane and junction alterations at the Ridgeway Lane/Poles Lane junction to the south east. No other highway improvements are proposed along either Ridgeway Lane or Lower Pennington Lane. Practically improvements would not be feasible because of adjacent verges, hedges and ditches.

Review

- 2.3.4 Lower Pennington Lane is identified on local cycle maps and signed as a recreational cycle route. However an increase in vehicular traffic, of around 20% in the peak hours and 15% across the day based on the data in the Transport Assessment, would mean that this route could become less desirable for cycling. The road narrows in places then widens again which means that suitable forward visibility in order to see cyclists is not continually provided. Whilst some forward visibility plans are provided in the Transport Assessment these are not clear and thus this should be assessed further.

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- 2.3.5 Street lighting along both lanes is very poor. Ridgeway Lane has very limited lighting. Lower Pennington Lane close to the site also has limited lighting, increasing to slightly more frequent columns to the north of Longford Place. However the limited lighting along with the varying width of the lanes means that cyclists and pedestrians would not be easily seen after dusk.
- 2.3.6 Whilst the assessment undertaken identifies it may be possible for two cars to pass on Lower Pennington Lane in some locations there are still pinch points. This is worse on Ridgeway Lane where passing is more difficult and use of the verges is required in many locations for vehicles to pass each other.
- 2.3.7 Consideration of forward visibility and statistical analysis by RGP suggests that the increase in traffic along Ridgeway Lane can be justified. However the statistical analysis by RGP is not validated and having driven along the lane there are many sections where drivers are likely to feel uncomfortable trying to pass another vehicle, pedestrian or cyclist over and above those identified in the Transport Assessment. No consideration has been given in the assessment to recreational walkers or cyclists that use the lane.
- 2.3.8 It is questionable as to whether the Monte Carlo statistical analysis undertaken to consider the likelihood of two vehicles meeting on the narrower sections of Ridgeway Lane is correct and appropriate. The full analysis undertaken has not been available for us to review and there is no validation of the modelling. This methodology is not an industry approved way of analysing the likelihood of vehicles meeting. It may be a VISSIM model would be better to review this because as well as the statistical analysis it would provide a video output to review the interactions along the road.
- 2.3.9 For Lower Pennington Lane whilst the Transport Assessment has identified that two cars could pass this would also be tight in sections. Given that this lane provides access to a caravan park, based on Manual for Streets a suitable road width of 5.5m should be provided along Lower Pennington Lane to allow two large vehicles to pass but this is not the case.
- 2.3.10 Whilst accident data shows that there were no personal injury accidents on either lane in the vicinity of the site in the latest five year period of data available an increase in traffic of around 15% on Lower Pennington Lane across the day (20% in peak hours), and an increase of around 27% on Ridgeway Lane across the day (up to 40% in peak hours) means that the chances of a car meeting another vehicle travelling in the other direction on either lane would substantially increase, which in turn raises safety concerns.
- 2.3.11 During construction of the site a number of HGVs will need to travel along either Lower Pennington Lane or Ridgeway Lane (or both) to access the site. If not managed appropriately this would raise issues of impact on existing road users.

- 2.3.12 Vehicle speeds recorded on Ridgeway Lane were 23-24mph 85th percentile and the 85th percentile speeds on Lower Pennington Lane were in excess of 25mph. This speed of traffic is at the level where injury accidents to vulnerable road users such as pedestrians and cyclists are more likely. With the intensification of traffic use this increases the risk of accidents which would be statistically significant. No measures have been put forward to address this.
- 2.3.13 Overall the increase in traffic would result in a greater risk of vehicles, pedestrians and cyclists meeting on each lane and this would raise safety implications meaning that this conflicts with the NPPF.

2.4 3) Vehicle Route between Ridgeway Lane and Lower Pennington Lane

Considerations

- 2.4.1 To consider whether a vehicle route between Ridgeway Lane and Lower Pennington Lane is suitable or necessary the following are reviewed:
- whether this route is required;
 - impact of traffic diverting to make use of new link;
 - impact on adjacent hospice; and
 - if a suitable design is proposed.

Proposal

- 2.4.2 A 5.5m wide street is proposed through the site providing a continuous route through the scheme and connecting Ridgeway Lane with Lower Pennington Lane.
- 2.4.3 The requirement for a through vehicle route across the site is part of the allocation policy. However no reason for why this is required has been put forward in the supporting information.

Review

- 2.4.4 Typically, there would only be a requirement to provide two points of access for safety or capacity reasons based on the number of houses proposed. In this case the number of houses proposed could be adequately served off one point of access. PEP's view is the proposals for two points of access is due to the substandard nature of Lower Pennington Lane and Ridgeway Lane. This means that the impact of the development on each of these roads in isolation is unacceptable. There are a number of downsides to providing a through route which are covered below.

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- 2.4.5 One consequence of providing a through route is creation of a rat run on unsuitable roads including Poles Lane and other local roads such as Woodside Lane and Viney Road. RGP confirm that this rat running would occur and the traffic increase is considered in their assessment. There is no justification for the increase or whether these roads are suitable. Many local roads including Poles Lane, Viney Road and Woodside Lane are narrow single lane width country lanes. Therefore an increase in traffic along this route would not be appropriate and raise safety issues.
- 2.4.6 To reach the Ridgeway Lane/Poles Lane junction from Lymington town centre the Google directions tool identifies Poles Lane as a route option and is often a quicker route depending on traffic conditions based on Google Maps. Whilst some consideration to a minor increase in traffic was given (six vehicles in peak hour periods suggested in the Transport Assessment) full consideration has not been given to the actual level of existing traffic altering their route if this link is provided.
- 2.4.7 Given congestion identified by both PEP and the RGP analysis at the Ridgeway Lane junction with the A337 to the north, both at peak times and during the day, drivers travelling to/from Lower Pennington Lane to/from the north east would be encouraged to use the proposed route through the site and on to Poles Lane to then continue north east towards the town centre. Therefore the impact of the alternative route at busy traffic periods has not been considered sufficiently.
- 2.4.8 The proposed 5.5m wide street in the development would allow a car and lorry to pass, as identified by Manual for Streets, and therefore the design meets the appropriate design standards for a through route. It would encourage traffic including from the caravan park and hospice on Lower Pennington and from the development to use inappropriate roads to travel to the town centre quicker by avoiding congestion.
- 2.4.9 Poles Lane and other local roads or the alternative route to the town centre are single track roads and are not suitable for two-way or an increase in traffic as suggested by RGP and the work undertaken by PEP.
- 2.4.10 In addition the vehicle access road from Lower Pennington Lane makes use of the existing access lane to Oakhaven Hospice. Currently staff or visitors to the hospice park along the access lane. With the redesign of this route to form the vehicle access to the site this means that cars could continue to park along the access road, potentially obstructing the residential site access. The allocation policy requires the provision of additional parking for the hospice as well as maintaining the existing on street provision. The site plan in the Transport Assessment does not show any additional car parking provided. However a further layout provided to us does show the parking.
- 2.4.11 It is unclear whether the design of the access from Lower Pennington Lane allows for additional and appropriate parking for the hospice.

2.4.12 The RGP Transport Assessment and the proposed layout do not address the issues of Poles Lane or the hospice in providing such a route through the site or that the route could be become a rat run to avoid congestion issues on the A337.

2.5 4) Suitability of the Ridgeway Lane Site Access Junction

Considerations

2.5.1 To assess the suitability of the Ridgeway Lane site access junction we have considered:

- whether an appropriate access design is proposed;
- can suitable visibility be achieved; and
- ecological/landscape/tree impacts.

Proposal

2.5.2 A priority junction site access with Ridgeway Lane is proposed with visibility splays of 2.4m x 43m proposed in each direction. It is also proposed that Ridgeway Lane in the vicinity of the access is realigned and widened to provide a junction that meets a design standard including the junction with Poles Lane just to the south. The widened road alignment proposed requires the removal of trees/hedgerow and impact on the adjacent ditch.

Review

2.5.3 A proper assessment of the proposed Ridgeway Lane site access junction has not been undertaken including impact of the removal of trees and hedges. A full assessment of the implications is required by all disciplines.

2.5.4 The Transport Assessment accepts that traffic speeds along Ridgeway Lane in the vicinity of the proposed site access could be greater than existing as a result of the realignment of Ridgeway Lane. As a result a visibility splay for a speed of 30mph has been put forward as this is the speed limit. However if using the speed limit as the basis for determining the appropriate visibility to provide at a junction the design speed should be considered as 'one step' above the speed limit. Therefore in this case a 30mph speed limit would require a scheme to adhere to a 37mph design speed, which based on Manual for Streets requires a 59m visibility splay to be provided. The implications are that there will be greater impact on trees and hedges than the scheme has identified to date.

2.5.5 The realignment of Ridgeway Lane and the junction with Poles Lane also means that Poles Lane will be more attractive to use, thus potentially increasing the level of traffic using this lane. Given the narrow nature of Poles Lane any increase in traffic levels should not be acceptable to the Highway Authority.

2.5.6 Further assessment as to whether a safe and suitable access with appropriate visibility splays can be achieved needs to be undertaken.

2.6 5) Design and Location of the Development Encourages Car Use

Considerations

2.6.1 We have reviewed whether the design and location of the scheme could encourage car use and have considered:

- overall site layout;
- ease of access by foot and cycle;
- ease of access by car.

Proposals

2.6.2 The development is inward facing with no frontage on to Lower Pennington Lane or Ridgeway Lane and as a result the scheme is not relatable to the surrounding area.

2.6.3 Pedestrian access points are provided to the north west and north east of the site. The route to the north west then ceases when it reaches Lower Pennington Lane. The route to the north east is at the end of a cul-de-sac. Further to the north east new footway provision is proposed on Ridgeway Lane.

Review

2.6.4 There is only one pedestrian route proposed from the site which avoids having to walk along the carriageway. This is the route to the north east towards Ridgeway Lane. There is however no legible/direct route from the majority of the site to reach this path and therefore this route is poorly related to the whole scheme and also is not on the desire line to local shops and facilities.

2.6.5 The footpath route to the north west whilst on the desire line to local facilities, stops at the edge of the site. This therefore would deter users given that there is no continuation of the path when leaving the site demise.

2.6.6 Given that the development is inward facing and there is poor pedestrian linkage with the surrounding area the scheme design would make car use attractive and not encourage non car means of travel as required by NPPF. The design is therefore contrary to the policy allocation which states that the scheme should integrate the site into the built up area connecting footpaths to central Lymington and Woodside Park.

2.6.7 The site design does not achieve the aims of NPPF as the site should be designed to encourage the use of sustainable means of transport and minimise car use.

2.7 6) Safety Concerns at Lower Pennington Lane/Ridgeway Lane Junction

Considerations

2.7.1 To determine if we have safety concerns with the Lower Pennington Lane/Ridgeway Lane priority junction we have reviewed:

- the existing traffic usage of the junction;
- safety record;
- whether the junction is designed in accordance with current design standards; and
- what the impact of an increase in traffic would have on the operation of the junction.

Existing Context

2.7.2 Lower Pennington Lane meets Ridgeway Lane at a simple priority junction. The Transport Assessment included ATC data for Lower Pennington Lane which identified an average weekday daily flow of 1212 vehicles two-way and a seven day average of 1071 vehicles. The traffic flows along Ridgeway Lane, which is a signed route to the town centre marinas, at the junction with Lower Pennington Lane are not known and should have been considered by RGP. Junction capacity testing was also not undertaken at this junction as part of the Transport Assessment.

Review

2.7.3 We have safety concerns relating to the suitability of the Lower Pennington Lane / Ridgeway Lane junction. Based on DMRB guidance CD123 a right turn lane on Ridgeway Lane should be provided on safety grounds at this junction if the daily two-way flows on Lower Pennington Lane exceed 300 vehicles. The existing daily traffic flows two-way based on the ATC undertaken by RGP are already in excess of 1000 vehicles, with the scheme proposals potentially adding a further 250 two-way movements per day. Whilst the existing road safety records do not show any personal injury accidents, increasing traffic at an already substandard junction is not appropriate without improvements.

2.7.4 The appropriate junction improvement based on guidance is the provision of a right turn lane on Ridgeway Lane for vehicles turning right into Lower Pennington Lane. Based on guidance this requirement is based on safety and RGP do not consider this.

2.7.5 In addition the junction spacing between the A337 roundabout and the Lower Pennington Lane junction on Ridgeway Lane is too short and is affected by existing queueing back from the roundabout. This is a safety issue which would be worsened by the increase in traffic.

2.7.6 The capacity and road safety implications of the development have not been considered and this is contrary to NPPF. NPPF is clear that safety issues are a clear basis for refusing a planning application.

2.8 7) Suitability of Pedestrian Crossing and Cycle Facilities at the A337

Considerations

2.8.1 When reviewing the suitability of the crossing facilities along the A337 the following are considered:

- where are the local facilities and what are the pedestrian and cycle desire lines;
- what crossing facilities are in place;
- safety record of the A337 corridor in relation to pedestrian and cycle accidents.

Existing Facilities and Traffic Conditions

2.8.2 There are currently no controlled pedestrian crossing points along the A337 in locations where potential residents are likely to want to cross to reach facilities to the north of the A337 north west of the site.

2.8.3 An on road cycle lane is provided around part of the A337/Ridgeway Lane roundabout.

Review

2.8.4 Typically if a major road needs to be crossed such as the A337 by the elderly, school children or shoppers with heavier bags then a suitable crossing should be provided.

2.8.5 On site observations have indicated that the A337 is busy both at peak times of the day and during the day. This means that there would be a severance issue and as a result this also raises road safety concerns because of the difficulty of crossing.

2.8.6 In terms of cycle provision the cycle facilities at the A337/Ridgeway Lane junction are unsuitable in safety terms. An accident review using the website CrashMap has identified that in the latest five year period of data available January 2015 to December 2019 three accidents at or on the approach to the roundabout have occurred of which two involved cyclists, one seriously. The scheme proposes to alter the roundabout junction but maintain the same cycle infrastructure. It is our advice that improvements to cycle provision are necessary.

2.8.7 Without suitable crossing facilities provided accessibility from the site to local facilities by non-car means is not achieved which is contrary to the requirements of NPPF.

2.9 8) Are the A337 Junction Capacity Improvements Adequate

Considerations

2.9.1 We have considered both the existing and proposed A337/Ridgeway Lane roundabout junctions on the basis of:

- existing junction operation;
- road safety record;
- traffic flows through the junction, both existing and proposed;
- proposed junction alterations.

Proposals

2.9.2 Junction improvements are proposed at the A337/Ridgeway Lane roundabout to the north of the site. The scheme would widen the A337 Milford Road south west arm to provide a short flare.

Review

2.9.3 The junction improvements proposed at the A337 roundabout of only marginally widening the A337 Milford Road south west arm are not adequate. From a recent site visit significant queueing was occurring at the junction. Given that traffic flows are still below pre Covid-19 levels this suggests that there is a greater capacity issue at this junction than that identified in the Arcady model presented. The junction improvements also do not improve the pedestrian and cycle facilities.

2.9.4 No traffic including pedestrians and cycle surveys or queue length data of the roundabout junction are provided. It needs to be understood whether the baseline Arcady model was calibrated against recorded queues on the ground as the model seems to be underestimating queues occurring. This would then underestimate the impact of the proposed development and mitigation measures necessary to address any impact.

2.9.5 The road safety record has indicated the accidents occurring involve cyclists. Therefore when providing junction mitigation, improvements to the cycle infrastructure at the junction should be considered.

2.9.6 The cumulative traffic is significant and the developer's consultant has yet to demonstrate that the impact of the development at this junction is not severe in line with NPPF. Safety issues have been identified on this basis and the proposals should therefore be reconsidered.

3.0 SUMMARY AND CONCLUSION

- 3.1 The proposals and associated information fail to demonstrate that the scheme would satisfy the principle transport related requirements of the NPPF in terms of achieving accessibility by sustainable travel modes, achieving safe and suitable access for all users and not having a 'severe' impact in safety and traffic terms.
- 3.2 The proposed access routes and facilities at the site for pedestrians are not suitable and off site accessibility for pedestrians to local facilities is poor.
- 3.3 Ridgeway Lane and Lower Pennington Lane are unsuitable for increased cycle and vehicle traffic and would result in a greater chance of vehicles meeting on each lane which would raise safety concerns.
- 3.4 The vehicle through route between Ridgeway Lane and Lower Pennington Lane would encourage rat running and increase traffic on Poles Lane. The RGP Transport Assessment and the proposed layout do not address the issues of Poles Lane or the hospice.
- 3.5 Further assessment as to whether a safe and suitable access with appropriate visibility splays can be achieved off Ridgeway Lane needs to be undertaken in consideration of the implications of the highway improvements on trees/hedgerow and the New Forest National Park.
- 3.6 The development layout design and access means that car use is more attractive than other modes.
- 3.7 The capacity and road safety implications of the development at the Lower Pennington Lane / Ridgeway Lane junction have not been considered. This is contrary to NPPF which is clear that safety issues are a clear basis for refusing a planning application.
- 3.8 The lack of suitable and safe crossing and cycle facilities on the A337 means that accessibility from the site to local facilities by non-car modes is not achieved which is contrary to the requirements of NPPF.
- 3.9 The developer's consultant has yet to demonstrate that the impact of the development at the A337 junction is not severe in line with NPPF and that the junction capacity improvements proposed for the A337 are adequate.