



Peter Evans Partnership

Transport Planning & Highway Consultants

31st May 2023

3305R/AJK

New Forest District Council; and
Appletree Court.
Lyndhurst
Hampshire
SO43 7PA

New Forest NPA
Town Hall
Avenue Road
Lymington
SO41 9ZG

Dear Sirs

APPLICATION 22/11424 – LAND EAST OF LOWER PENNINGTON LANE, LYMINGTON

We write further to our highway, traffic and safety objection to application proposals for 82 homes on land east of Lower Pennington Lane, Lymington. We have been appointed by PALLS to review the transport and highway elements of the scheme proposals and have also now had chance to review the Hampshire County Council (HCC) highway response dated 26th April 2023 and Lymington and Pennington Parish Council response dated 17th March 2023.

We wish to reiterate our concerns regarding the following areas:

- Suitability of access for pedestrians and cyclists;
- Suitability of vehicle access;
- Ability to achieve off-site highway works;
- Traffic impact; and
- Need for right turn lane.

Suitability of Access for Pedestrians and Cyclists

We welcome HCC requiring a Walking, Cycling, and Horse Riding Assessment and Review (WCHAR) to be undertaken for the scheme and that further information on the treatment of the Public Right of Way footpath through the site is required.

Our view is that an independent Road Safety Assessment should be undertaken because it gives a comparative analysis using road safety techniques of the implications for vulnerable road users and those with additional requirements. A WCHAR is not independent and does not assess the level of risk involved or potential injuries to road users without the improvements.

Until a full assessment of the access of the site for pedestrians and cyclists is completed it is unclear how the applicant can state suitable access is provided. We would also expect Road Safety Audits to be undertaken of any on or off-site highway improvements being put forward for pedestrians and cyclists which to date has been lacking.

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It has been confirmed by Lymington and Pennington Town Council that cycle access through Woodside Park or from the site to Forest Gate Gardens is not agreed, contrary to the applicant's submission. Therefore the only cycle routes from the site would be on-road. This does not provide safe and suitable access for all cyclists and therefore is contrary to LTN1/20. It is unclear how the applicant aims to overcome this matter. HCC as highway authority need to consider their comments on pedestrian and cycle accessibility in light of the Town Council comments.

Suitability of Vehicle Access

The applicant, based on the planning portal information has failed to identify how the vehicle access from Ridgeway Lane can be achieved as the design includes land outside the redline boundary of the application and public highway. On this basis the vehicle access on Ridgeway Lane is undeliverable and the only vehicle access that could come forward if the scheme is approved is from Lower Pennington Lane. Lower Pennington Lane is not suitable as the single vehicular access to the site. We ask that this issue of land availability is given consideration by the District Council, the National Park Authority, and HCC as this is fundamental to the scheme.

Off-site Highway Works

The applicant has also failed to identify how the proposed passing bays along Ridgeway Lane can be achieved as land is in third party ownership. HCC suggest some road widening instead. It is understood that the HCC public highway records along Ridgeway Lane are inaccurate and include private land, and therefore widening would not be possible. However again it hasn't been confirmed whether works are achievable within highway land or land within the redline of the application. Therefore, the provision of a safe and suitable vehicle route to the site along Ridgeway Lane has still not been confirmed. We understand there are concerns on the environmental impact on the National Park if access is taken from Ridgeway Lane.

No Road Safety Audits have been undertaken along Lower Pennington Lane or Ridgeway Lane to determine whether there would be a road safety risk relating to the increased vehicle, pedestrian, and cycle movements, especially in relation to narrow nature of the lanes and the adjacent ditches.

The proposed access points and footpath crossings all result in significant amount of tree/hedgerow loss along Ridgeway Lane and Lower Pennington Lane. This needs to be considered by the District Council, HCC and the National Park Authority ecologists as to whether this would be acceptable or even possible. We are also concerned that if the tree/hedgerows were cut back/removed this would alter the nature of the lanes, especially Ridgeway Lane, which in turn could impact on the speed of vehicles, increasing speeds on the approaches to the pedestrian and vehicle access points to the site.

Hospice Parking

With the new access onto Lower Pennington Lane some Hospice parking will be lost and it is not been demonstrated whether the additional provision is sufficient. This matter has not been considered by HCC and parking surveys should be undertaken given the remote location to confirm the provision required.

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Traffic Impact

We understand that HCC has advised that they do not envisage the proposed vehicle through route through the site would be attractive for vehicles travelling to/from Lower Pennington Lane, and in turn there would not be an increase in vehicles on Poles Lane. However, traffic surveys undertaken by the applicant were undertaken in December so do not identify the significant increase in traffic travelling along Lower Pennington Lane in summer months to/from Hurst View caravan park and the marshes car park. Many of these drivers would be unfamiliar with the local area and be following satellite navigation. There is often congestion along the A337 in the summer months and based on our google maps/traffic review drivers are likely to divert along local lanes and through the site in order to travel to/from Lower Pennington Lane and the Quay. We continue to reiterate that this potential traffic and road safety impact has not been satisfactorily assessed/addressed.

We have identified that traffic flows on Lower Pennington Lane are in excess of 1000 vehicles per day in winter months, and likely higher in the summer. The level of vehicle traffic passing along this route is already unsuitable for the design of the lane. With an increase in vehicles, cyclists, and pedestrians sharing the lane this raises road safety concerns which have not been addressed.

The applicant should be required to assess the potential highway improvements being considered by HCC for the A337/Ridgway Lane roundabout to confirm whether or not they would mitigate against the traffic impact of the development proposals. To date unequal lane usage has not been considered at the roundabout and the analysis which HCC rely on underestimates the impact of the development.

We remain concerned on the interaction of the traffic turning right into Lower Pennington Lane and traffic using the Ridgway Lane exit at the roundabout. Cyclist safety at this junction remains a concern because of the level of cycle accidents.

Need for right turn lane

HCC discount the need for a right turn lane at the Lower Pennington Lane Ridgway Lane on the basis that it is only an 8% impact. However, on the key right turn movement from the A337/Ridgway Lane roundabout in the evening peak hour it is an 18% impact. To confirm that a right turn lane is not required both junctions should be reconsidered together because of the increased risk of rear end shunts and the likelihood that traffic will back up to the A337/Ridgway Lane roundabout increasing the risk to cyclists.

Conclusion

The proposals fail to demonstrate that the scheme can satisfactorily achieve accessibility by sustainable travel modes and therefore is contrary to NPPF. The proposals also fail to confirm that the scheme would not have a 'severe' impact in safety and traffic terms in line with NPPF. Therefore the application should be refused based on severe impact.

Yours faithfully

ANDREW KENYON
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