

# SCHEDULE 2 TO HIGHWAYS/TRAFFIC SUBMISSION

# TRANSPORT ASSESSMENT CRITIQUE



#### <u>Transport Assessment (214 pages)</u>

Having studied the LVA Transport Assessment document, I have the following comments to make:

#### Sections 1-9.8

• Paras 1- 9.8 are repeated later in the document.

#### Section 2: Background and Policy

• <u>Para 2.22</u>- Keinton Mandeville is located within the Northstone, Ivelchester and St. Michael's ward, classified as Zone C (green), for **low population** areas.

#### Section 3: Existing Conditions

- Para 3.11- Barton Road "runs north from Keinton Mandeville as a 30mph residential street for approximately 400m before transitioning into a country lane typical of the area with a 60mph National Speed Limit."- **INCORRECT.**
- Para 3.15- "There is continuous footway coverage of varying width along the northern side of High Street from the junction with Barton Road to approximately 40m west of the junction with Cotton's Lane." This is inaccurate- some pavement is extremely narrow, other parts are in poor condition or are not paved at all. There is no footway along the Quarry Inn frontage, which is used as part of the car park, meaning pedestrians must, at times, walk in the road.
- Para 3.20- acknowledges that village centre is between Queen St. and Irving Road
- Paras 3.23- 3.25- mention of footpath L16/1. This is in fact part of the Celtic Way (725 miles/1167 kms long), which runs from Wales to Cornwall via Somerset. It is possible to visit over 100 prehistoric sites along its route. L. Eldred (SCC Public Rights of Way Officer) of the SCC Rights of Way Team has advised the Applicants that:
  - 1. The long-distance route, the Celtic Way runs through the site.
  - 2. The current proposal will obstruct the footpath L 16/1 due to the proposed woodland planting.
  - 3. The proposal either needs to be revised to prevent any obstruction or a diversion order applied for. The applicant must apply to the Local Planning Authority for a diversion order.

This issue has obviously not been considered by the Applicants; there is no mention of it in their documents.

- Paras 3.23- 3.26- Re: extensive footpaths/PROWs- The PROW from the Village Hall to Chistles Lane is a public footpath only, not a bridleway, cycle path or road. Only Village Hall users are permitted to use motorised vehicles along it.
- Para 3.27- "Automated Traffic Count data was obtained in May 2021 on B3153 at the location of the proposed site access." NB- this was during the Covid pandemic 'work from home' period.

#### Section 4: Accessibility

- Para 4.5 Table 4.2- re: distances/walk times measured by applicant to various village and other destinations. NB: these measurements were taken from the northern edge of the site for destinations north of the site, and from the southern edge of the site for destinations south of the site, giving inaccurate and misleading results. SHOCK's calculations all originate at a central point of the site, giving a much fairer idea of distances. Note that there are no marked bus stops at the top end of Barton Road. A South West (SW) Coaches office member informed me that as this was because it is "an infrequently used route" and that SSDC will not erect sign posts and there is no appropriate place to site a timetable. Bus drivers are aware of the these stops- which are request only; SW Coaches gave no advice when I asked how potential passengers would know about these.
- Para 4.8- There is **no** doctor's surgery at the Village Hall, contrary to that stated here. This service ended with the first Covid lockdown, with no signs that it will re-start.
- Para 4.10- Bus Transport information is incorrect. There is no 2 hourly bus service.
   Also, as mentioned in Para 4.5- the two bus stops at the top of Barton Road are
   unmarked request stops; SSDC won't pay for signage for 'an infrequently used
   route'- (SW Coaches member quote). A wooden pole next to post box carries electric
   cables and notices should not be affixed to it. Bus drivers know where to stop, but
   new/potential passengers would have no idea.
- Para 4.19- re: "Keinton Mandeville also falls within the Somerton area served by
  "Community Transport South West Ltd..."- I have lived in Keinton Mandeville for over
  40 years and have never seen this service here.

#### Section 5: Development Proposals

- Para 5.6- another mention of PROW L16/1, but not of its historic importance. Also see Paras 3.23- 3.25.
- Para 5.8- 'Chilstles' (presumed typo) instead of Chistles. This paragraph states that "It is understood that Chistles Lane is used by pedestrians, cyclists and vehicles to access the village hall and it is anticipated that this would also be used for onward journeys between the site and the public highway and local primary school." Note that there is only a public footpath between the proposed site and the village. Only village hall users are allowed to access the hall via Chistles Lane using bicycles and cars. "No link for motor traffic will be provided between the site and the village hall." This sentence appears to contradict the previous paragraph.
- Para 5.13- Basically a repeat of Para 5.6. Also see Paras 3.23- 3.25.

#### Section 6: Trip Generation and Distribution

 Para 6.10- "Given the low levels of traffic anticipated to arise from the proposed development (UNTRUE), it is considered that the traffic generated by the development would not have a severe impact on the local highway network." (UNTRUE).

# Section 7: Traffic Impact Assessment

- Para 7.3- what has the 'Lakeview' development got to do with this application?
- Para 7.4- "vehicular access is to be granted from Lakeview Road via Chistles Lane."

  But this proposed development in not connected to Lakeview Road.
- Para 7.7- what has the 'Church Street' development got to do with this application?
- Para 7.10- What has 'other committed development' got to do with this application?

Para 7.17- 'At the time of data collection, although the country was not under any 'lockdown' restrictions due to the Covid-19 pandemic- it was under work from home advice, meaning less vehicular traffic through the village.

# Section 8: Framework Travel Plan

 Para 8.2- does not take into account need for workers etc. to drive out of Keinton Mandeville as there is no appropriate bus service.

# Section 9: Summary and Conclusions

- Para 9.3- Basically a repeat of Para 5.6 and 5.13. Also see Paras 3.23- 3.25. The "uncontrolled pedestrian crossing" does not take into account that the land opposite the proposed pedestrian access from the site is, in fact, is privately owned.
- Para 9.7- "The results of the junction impact assessments indicate that the addition of the development traffic would not result in a severe impact on the highway network." SHOCK's findings have discovered that this would contribute to a sizeable impact on the already large numbers of vehicles travelling through, or parking in, the centre of Keinton Mandeville, with the resultant risk to pedestrians, motorists and other road users (including horses from stables in the village and the Charltons).
- Para 9.8- maintains that "the site provides a safe and suitable access can be achieved, and there would be no severe impacts on the local road network...". From SHOCK's research this has been found to be blatantly untrue.
- Repeat of maps/drawings from Plan Site Layout.

# Appendices A- G

 Appendices A-G are blank sheets, then repeated later with info. Much of this is very difficult to read/decipher.

#### Appendix D- Master Plan

• with reference to PROW L16/1- "Existing PROW accommodated within peripheral green buffer". PROW L16/1 is part of the Celtic Way (See Paras 3.23- 3.25, 5.6, 5.13, 9.3) and must be preserved intact and remain without interference.

Sarah Hamlet

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