

Fao Ms Daphne Hayward

I have recently become aware of this planning application for development of land on the south side of Lower Road, Bedhampton. Although I am not qualified to comment on the planning merits of the scheme I have around 40 years' experience in the field of highways development control and I feel I can legitimately comment on what I perceive to be errors and omissions within the reports submitted by i-Transport. I believe it is important I bring to the council attention before the application is determined. I am also sending a copy of this letter to Stuart Jarvis.

My qualification to speak on this matter is since 2008 I have provided a consultancy service to developers providing advice and transport statements to developers. Prior to this I was the principal officer with responsibilities for highways development control and sustainable transport matters at Portsmouth City Council and pre-Unitary for that council (1996) I was the de facto HCC highways development control agent for the county council. Over that time I was the council's principle highways development control officer for many of the major developments in Portsmouth - Anchorage Park, Port Solent, Gunwharf Quays and Fratton Goods Yard.

I will not comment on the traffic modelling of the Bedhampton Road junctions as I do not have enough experience in this specialist work. However any modelling needs to be treated with caution because, as history has shown, future outcomes seldom mirror the predicted outcomes. But from my experience I do know that under some conditions apparently small differences in modelling data can significantly affect the outcomes and where the consequences of this might be severe then sensitivity analysis using alternative data may be appropriate.

I will summarise my comments as follows:

- I have concerns about inconsistency in the numbers of pedestrians and cyclists within tables 2.1, 2.2, 2.3 and 4.1. I have only looked at the weekday

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- AM peak figures but must assume errors in these might be replicated across the other data.
- i-Transport have been selective in their quotation from Manual for Streets to make their case that the section of Lower Road without a footway is a “shared surface street”. A more thorough reading of Manual for Streets will confirm that the requirements for a shared surface street are much more than simply an absence of footways.
- I would have expected i-Transport to have provided, or HCC to have required, a drawing showing forward visibility through the two bends. This would quantify the extent to which the high hedge on the east side of Lower Road obscures visibility of pedestrians, and perhaps cyclists, on this side of the road.
- There is no justification to assume that pupils reasonably could access Warblington school by bus or by rail. Cycling to that school involves child cyclists negotiating sections of busy, sometimes narrow, roads and crossing major junctions at peak commuting times. I would have expected the reports to address the personal safety of these children on the suggested routes to school.
- Walking distances to local amenities have been derived from GoogleMaps rather than surveyed on the ground. I have provided two examples where I believe the derived distance to the facility is in fact more than the 2,000m prescribed by HCC and, because of level differences and obstructions/delays the 2,000m itself might be unrealistically high for journeys undertaken on a frequent basis.
- Increasing the junction radii at the site access, despite being encouraged by HCC to facilitate easier turns by super large refuse vehicles, is contrary to the advice given in Manual for Streets which seeks to minimise corner radii, accepting this means very large vehicles may need to use all the available carriageway width in the junction. An unnecessarily open junction may itself be a hazard to cyclists on Lower Road.
- Although the report refers to “local bus stops” these are at least a 500m uphill walk from the site (HCC suggest 550m) and involve a walk through a narrow footpath with poor casual surveillance.
- The accident data I have seen is May 2011 to April 2016, so it is now more than three years out of date.
- In view of my concerns about the bus, rail and cycling alternatives to car use I have to question whether this site truly can be described as “accessible” or “sustainable” and I believe my concern is reflected in the level of allocated car parking proposed for the site which is consistent with a car-orientated development.

Before expanding on these bullet points I will make some general comments. If it is to be argued the site is sufficiently accessible to encourage walking trips then clearly the infrastructure to support those trips needs to be acceptable. There is a significant level difference between the site and the bus stops (and indeed many of the local facilities identified by i-Transport) and I think it is reasonable to question whether 2km might be

excessive for a regular journey particularly when it is dark and/or the

weather is inclement taking into account the quality of the walking routes and personal safety.

Pedestrians following the route through Lower Road must walk in the carriageway round a double bend. As regards the route through the footway from Lodge Road to Bedhampton Hill Road I suggest this has not been properly described. During my time at Portsmouth City Council I dealt with footpath closures under the Highways Act, representing council at Magistrates Court. The test was whether there was a "more commodious" route available following closure. Generally this meant showing the alternative route wasn't significantly longer or less direct but also how it was better than the route proposed to be closed by way of being better lit, wider, more casual surveillance etc. This was in the days before there was (apparently) a much greater fear of assault or worse in unlit, narrow "alleyways" with little or no surveillance. i-Transport describe a route that sounds unappealing in the dark/wet and I would question whether a pedestrian could conveniently pass a wheelchair/mobility scooter user in at least part of its length without retracing their steps to a wider section of footpath, particularly in wet weather when no-one is likely to want to squeeze past a wet hedge.

- The reports refer to the "local bus stops". I think "closest" is perhaps more accurate than "local" - the difference in elevation between Lower Road and Bedhampton Road might be relevant as an uphill walk in itself may be a disincentive. To this can be added deficiencies in the walking routes as identified above. There also could be safety concerns crossing to and from the eastbound bus stops; walking to a "safe" crossing place could extend the walking distance. i-Transport state "frequent and regular rail services to destinations including Portsmouth, Chichester and central London are available from Bedhampton Station". I believe this rather over-states Bedhampton's status within the rail hierarchy and given the limited and irregular service at Bedhampton station (as demonstrated in the reports under school audit) I think it is likely "rail" travellers would drive to Havant with its far superior service, whether "kiss and ride" or to park, and take a train from there.

Modal Split in Lower Road

The proportion of cyclists/pedestrians as part of all traffic is unusually high emphasising Lower Road's role in the Havant cycle network. However I find it surprising that i-Transport have concluded that following development the proportion of pedestrian and cyclists will be "higher than it is now". As Lower Road serves only local motor traffic - it's a cul-de-sac - but is part of a wider, signposted cycle network attracting cycle trips from a wider area (i.e. adding to the cycle trips generated from the Lower Road area alone) I'm not sure how they logically conclude that this new development will generate a significantly higher proportion of walking/cycling trips than the area as a whole when it is

no more or less accessible.

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This interpretation may in fact be because of arithmetical errors within the tables, which I refer to later.

Accessibility/Walking Routes

I have checked a couple of the distances shown in the reports using GoogleMaps in pedestrian mode. It would seem i-Transport used this same method for their reports; this is disappointing as in my own work I would have used a measuring wheel on the ground for facilities close to the 2000m boundary as this would be not only more accurate but also gives an appreciation of level changes and obstacles/delays which may affect the actual walking distance and whether walking is in fact a reasonable and realistic choice if an alternative (car) is available.

Using Googlemaps my measurements are from the edge of the site, rather than the middle as iTransport claim to have done, so my distances would be erring on the side of the conservative. My measurements on Googlemaps shows 2.1km to Havant College and 2km to Aldi to which you then have to add the extra distance to the centre of the site.

Figure 1 - Walking distance to Havant and South Downs College

Figure 2 - Walking distance to Aldi

I chose these examples as i-Transport show them close to but below the 2,000m figure suggested by HCC. If my measurements are correct then the site is less accessible than

the i-Transport report suggests. If these easily checked facts are

incorrect it does throw some doubt on the accuracy of other aspects of the reports not open to this form of convenient scrutiny.

School Journeys (Secondary School) and Non-car Commuting Journeys

The site falls within the Warblington Secondary School catchment area. The best case scenario would be an assumption that all the secondary school age pupils will go here because alternative schools are likely to be further away which would suggest pupils have to be driven to school (or at least part of the way if continuing by rail – e.g. Portsmouth Grammar School) which would clearly contradict any argument for accessibility/sustainability. The report gives timings to get to Warblington School by train from Bedhampton station but whilst the school starts at 08:30 for pupils to get there on time they have to be getting off the train at Warblington at 07:40, presumably because of the service timetabling. I would question whether it is reasonable or desirable for pupils having to be at the school gates with almost an hour to spare.

The same irregular timetabling of services may be a disincentive to using Bedhampton station for commuting and many leisure purposes. The bus option is 500m walk (HCC say 550m) or if you don't walk through the narrow Lodge Road footpath then around 700m then a short bus ride to Havant Bus Station followed by a 1500m walk. Again I would not think this is realistic for a daily journey to school when the site provides parking in anticipation of high levels of car ownership.

As with rail the distance to walk to the bus stops combined with this being noticeably uphill and the less than ideal walking routes can be expected to make bus use an unattractive option for commuter and leisure journeys if a car is available.

From the above it appears that walking to catch a bus or train are not reasonable options for travel to school or for regular commuting and the only genuine options for secondary school pupils to get to Warblington School are either to cycle or be driven. A "best case" might be around 15 extra secondary school age cyclists in Lower Road morning and evening if the site is considered to be genuinely accessible by sustainable modes. (Although the reports refer to 15 children of primary school age no figure is given for those of secondary school age but presumably the numbers between 5-11 and 11-16 are likely to be similar).

Quality of Cycle Route to School/Road Safety

The report suggests a cycling time of 13 minutes, apparently derived from GoogleMaps. This seems an optimistic estimate given both the nature of the route and that these are

child cyclists not adults.

The cycling route is described as described as "a continuous signed cycle route" which it may well be but this isn't the same as a safe cycle route as can be seen looking at the map in Appendix C of i-Transport Technical Note where even the most likely route (and possibly the safest of the options available) unavoidably uses Bedhampton Road and then West Street and Waterloo Road or the station car park. This is a somewhat tortuous route and pupils might be tempted to use New Road/Elmleigh Road which would mean negotiating the busy roundabout by the Civic Offices.

Figure 3 - Cycling routes to Warblington School

If the 13 minute cycling time is correct this means pupils leaving home at or just after 08:00 (allowing some time for contingencies and to secure the bike and walk to class) and travelling at peak commuting time.

The screenshot following the Havant cycle map in the report (reproduced above) suggests little thought has gone into the cycle journey from a child cyclist perspective and their personal safety. As well as the obvious hazard of cycling along Bedhampton Road there is the right turn to cross the railway gates and West Street is narrow with cars parked both sides. To avoid cycling on-road to cross Grove Road North children will have to use (and wait at) two light controlled crossings or one light controlled crossing and then illegally through the pedestrian precinct.

The same reliance on GoogleMaps is evident on page 52 with the walking route to Bidbury Infant School. In this case walking the route would have brought them to this

footpath, avoiding the long detour they show.

If the applicant is going to argue walking and cycling will make a significant contribution to modal choice on this development then more effort should have gone into physically auditing the suggested walking and cycling the routes which should also have identified the practical constraints of the options put forward for rail/bus and relevant safety matters, especially for but not limited to child cyclists.

Existing and Future Movements (AM peak weekdays only)

There appear to be gross errors in the data in the four tables in the i-Transport report. For the purposes of this letter I've abstracted the data for the Thursday and Friday between 07:30-08:30 but in these days of spreadsheet analysis it is reasonable to assume that the cause of the errors in this one hour will also have replicated in the analysis for the other times and days.

Peds+cycles two way S->N N-S 2 Way S->N N-S 2 Way From table 2.1 and 2.2

Thursday 10th May 7 6 13 6 14 20 33 Friday 11th May 11 8 19 10 11 21 40 Average 9 7

16 8 12.5 20.5 36.5 Table 2.3 Thursday 10th May 15 Friday 11th May 27 Average 21

Table 4.1 Weekday average (existing) 6 16 22 Weekday average (generated) 12 2 14

Total 18 18 36 Pedestrians Cyclists

The figures in the three orange boxes should be the same but clearly they are not.

As well as the confusion with what the actual pedestrian and cyclist use of Lower Road is projected to be I note that the development generated trips between 07:30 and 08:30 is given as 12 pedestrian (some of which might be some of the primary school age pupils walking to school although again this seems low in the context of an argument about sustainable life-styles and accessibility as at least some of those pedestrians would be adults who presumably then return home so we might be looking as a few as 4 primary school children walking to school) and there are only 2 extra cycling trips. If there are 15 secondary school age pupils and only 2 will be cycling then having discounted walk/rail/walk and walk/bus/walk as options (and with only a total of 12

walking trips through Lower Road for all trips to primary school, to secondary school and for commuting it would seem i-Transport agree these are in fact impractical) the assumption has to be the other 13 would be as car passengers.

If the pedestrian/cyclist figures in the tables are wrong then of course this affects the calculations of risk of pedestrians/cyclists meeting cars travelling in opposing directions within the section of Lower Road without a footway.

Shared Surface Streets

i-Transport reason that the section of Lower Road without a footway is a shared surface street by quoting from Manual for Streets - *"In this section (of Lower Road) pedestrians and cyclists use the carriageway as a shared surface. (and) is suitable to continue to serve the development. The reasons being that this section of Lower Road exhibits all of the three criteria identified in 7.2.14 of Manual for Streets where such shared surfaces work well, i.e.:*

- *"In short lengths, or where they form cul-de-sacs;*
- *Where the volume of motor traffic is below 100 vehicles per hour (vph) (peak);*
- and
- *Where parking is controlled or it takes place in designated areas".*

The quotation is correct but incomplete and reproduced out of context.

i-Transport have omitted the important text that immediately precedes the three bullet points in paragraph 7.2.14 - *"Subject to making suitable provision for disabled people, shared surface streets are likely to work well...."*. This provides a somewhat different context.

But I will draw your attention to the opening paragraphs of this section, Shared Surface Streets and Squares, which says:

*"7.2.8 In traditional street layouts, footways and carriageways are separated by a kerb. In a street with a shared surface, this demarcation is absent and pedestrians and vehicles share the same surface. Shared surface schemes work best in **relatively calm traffic environments**. The key aims are to:*

- *encourage low vehicle speeds;*

- *create an environment in which **pedestrians can walk, or stop and chat, without feeling intimidated by traffic;***

- • make it easier for people to move around; and

- • promote social interaction

7.2.9 In the absence of a formal carriageway, the intention is that *motorists entering the area tend to drive more cautiously and negotiate a right of way with*

pedestrians on a more conciliatory level.

7.2.10 However, **shared surfaces can cause problems for some disabled people.... It is therefore important that shared surface schemes include an alternative means for visually impaired people to navigate by**".

Whilst i-Transport might understandably not wish to draw attention to this additional text and context, which I feel undermines their argument, Hampshire County Council as highway authority should be aware of it and have raised concerns for this misrepresentation. You will not need reminding there are a lot of elderly residents in this area some of whom you would expect to have disabilities of some degree.

In my role at Portsmouth City Council I was involved at the very earliest days of moving away from conventional "carriageway and two footways" thinking and in respect of shared surface streets the philosophy for when it might be appropriate was "Will the driver and the pedestrian recognise and react to each other?"; it's much harder for a driver to intimidate a pedestrian when they are near neighbours than when they live in different roads.

i-Transport make the case this is a road with "high levels of pedestrians and cyclists". There are often situations where there can be high levels of A with low levels of B or vice versa but it does not follow that high levels of A and B simultaneously will be acceptable or safe. Whilst the 100 vph figure quoted may be acceptable as a maximum vehicle flow where there are typical residential levels of pedestrian/cycle activity at higher levels of pedestrian/cycle activity (such as on one of the signed cycle route linking to a Sustrans route) a lower level of motor traffic is likely to be appropriate to ensure the safety of vulnerable road users. In this case both motor traffic and pedestrian/cyclists will increase as a result of the development.

The reasoning that "*Lower Road is a genuine shared surface at all times both day and night*" simply due to it not having footways and having a high proportion of pedestrians and cyclists is not convincing. It seems to fall into the "I have an electric car that is red. You have a red car so it must be electric" logic. Paragraph 7.2.8 of Manual for Streets bears repeating

"The key aims (of shared surface streets) are to..

- encourage low vehicle speeds;

- create an environment in which **pedestrians can walk, or stop and chat, without feeling intimidated by traffic;**

- • make it easier for people to move around; and

- • promote social interaction

Between the bends Lower Road does not provide that environment. Whilst one might well stop and chat with one's neighbours in the carriageway at the junction of Lower Road and Lodge Road and people do stop and chat in the town centre West Street precinct on market days even with the stallholders driving slowly and carefully through the pedestrians it is unlikely anyone would feel safe and comfortable socialising in the

"shared surface" between the two bends in Lower Road. **Taking all**

the MfS guidance into account, I do not feel referring to the section of Lower Road without footways as a “shared surface street” can be justified.

Forward Visibility in Lower Road

i-Transport have not provided a plan showing the forward visibility sight line through the bends in Lower Road. This would identify those parts of the route through Lower Road where drivers travelling at the 85%ile speed (from speed surveys this is around 20mph) have sufficient forward visibility to manoeuvre round an obstruction in the road – which might include a pedestrian on the east side of the road – or bring their vehicle to controlled stop and where such an obstruction might require emergency braking, a sudden swerve or worse result in a collision.

The absence of this plan seems a major oversight.

New Junction on Lower Road

The proposed new junction to the site seems to accord with MfS recommendations for sight lines provided the visibility splays are kept clear. How will this be ensured if the hedge is retained? This is picked up in the Stage 1 safety audit.

i-Transport refer to a more generous radius at the entrance to the site, requested by HCC “to ease the path of large vehicles”. This industrial estate scale engineering is in complete contradiction to the advice of Manual for Streets (paragraph 6.3.12 onwards) and does have a bearing on traffic speeds and therefore pedestrian and cyclist safety. This is a situation where the limited traffic on Lower Road passing the site entrance may be low enough that drivers routinely leaving the new estate simply assume nothing will be coming and therefore “don’t see” approaching cyclists, particularly in poor weather or lighting – commonly known as SMIDSY (sorry mate, I didn’t see you).

Councils seem to assume that in future refuse vehicles will get bigger and bigger – even in Portsmouth where the limiting factor has to be getting them round areas such as Fratton and Stamshaw with their narrow streets, tight corners and high levels of on-street parking. The reality is likely to be that for the service providers the size of vehicle won’t be determined by the biggest vehicle the manufacturers can produce but the size that most efficiently can get round the route i.e size will be constrained by the tightest parts of the route and over-engineered new developments will have little bearing on the decision.

HCC letter dated 23 May 2019

HCC indicate the bus stops (via Lodge Road) are 550m. Presumably this is from the edge of the site, from the centre of the site it would be rather further.

HCC refer to the provision of a 2m footway internal to the site to avoid unnecessary loss of hedgerow. In the context of i-Transport’s conviction that the section of Lower



Road between the bends is a shared surface street the requirement for this footpath seems illogical – if it is acceptable to have “shared surface” through the bends then surely a footway is unnecessary on the straight section of Lower Road where visibility between drivers and pedestrians in the road is much better – it is the same vehicles and the same numbers of vulnerable road users. Is the footway being provided because without one new residents would complain the lack of a footway is unsafe? This argument can be extended throughout the site – why isn’t the whole estate shared surface streets?

HCC express concern that the unallocated parking is concentrated at the south-west end of the site. I agree with that concern but also suggest 6 spaces is below an acceptable minimum. Residential Car Parking Research says “Whilst there are times, such as evenings and weekends, when residents are likely to receive significant numbers of visitors in cars, this demand can to some degree be offset by other residents being away at the same time. This balancing effect is most significant when a high proportion of parking spaces are unallocated (and so available to both visitors and residents). This research suggests that no special provision need be made for visitors where at least half of the parking provision associated with a development is unallocated. In all other circumstances, it may be appropriate to allow for additional demand for visitor parking of up to 0.2 spaces per dwelling”. Six unallocated spaces for 50 houses is four short of even the suggested minimum.

In conclusion, in my opinion i-Transport have failed to demonstrate the site is “accessible” and “sustainable” by way of convenient access to good quality alternatives to using a private car for appropriate journeys – the bus service is remote accessed by poor walking routes, the rail service at Bedhampton station is irregular and infrequent. Neither bus or rail offer a sensible option for travel to Warblington School or for commuting. Although Warblington school is within acceptable cycling distance the route involves child cyclists travelling on busy, and sometimes narrow, roads in the morning commuting peak hour and the safety issues arising from this are not considered.

In addition to the above I am concerned that there appears to be arithmetic errors in the calculations leading to estimates of lower levels of pedestrians and cyclists in Lower Road in the weekday morning than is likely to be the case (I have only looked at figures for the weekday AM peak) and this has implications for i-Transport’s justification of Lower Road between the bends as a “shared surface Street” where MfS is selectively quoted to avoid the conclusion that it is not in fact a “shared surface street” but simply a road which, presumably for historic reasons, does not have a footway on either side.