

**APPEAL BY DUDSBURY HOMES (SOUTHERN) LIMITED
AGAINST THE REFUSAL OF A PLANNING APPLICATION
P/OUT/2023/01166 FOR MIXED USE DEVELOPMENT OF
UP TO 1700 DWELLINGS BUSINESS PARK AND VILLAGE
CENTRE PLUS ROAD ACCESS ARRANGEMENTS AND
ASSOCIATED INFRASTRUCTURE (OUTLINE
APPLICATION WITH ALL MATTERS RESERVED APART
FROM ACCESS OFF HILLBURY ROAD)**

**LAND TO THE SOUTH OF RINGWOOD ROAD
ALDERHOLT**

**PROOF OF EVIDENCE ON HIGHWAYS / TRANSPORT
ISSUES PREPARED ON BEHALF OF ALDERHOLT
PARISH COUNCIL BY
MARK BAKER BSc CEng MICE FCIT FILT Eurlng**

VOLUME 1: TEXT

Planning Inspectorate Reference: APP/D1265/W/23/3336518

81800/1
May 2024

**Mark Baker
Consulting
Limited**

32 Montpelier Court
Station Road
Montpelier
Bristol BS6 5EA
Tel: 0117 924 6994

Email: mbctrffic@gmail.com

Directors:

M Baker
BSc CEng MICE FCIT FILT Eurlng

T J Baker

Registered in England and Wales 6028435
Registered office as above.

CONTENTS

	Page
1.0 INTRODUCTION	1
1.1 Preamble	1
1.2 The Reasons for Refusal	2
1.3 Structure of my Proof of Evidence	10
2.0 NATIONAL AND LOCAL PLANNING POLICY AND GUIDANCE	11
2.1 Introduction	11
2.2 NPPF (December 2023)	11
2.3 The Council's Local Plan	14
3.0 SETTLEMENT HIERARCHY ISSUES	16
3.1 Introduction	16
3.2 Guidance	16
3.3 Public Transport Services	18
3.4 Appeal Decision	21
3.5 Overall Site Location	25
4.0 TRAFFIC IMPACT ISSUES	27
4.1 Introduction	27
4.2 Trip Rates	28
4.3 Internal Trips	31
4.4 Trip Distribution	32
4.5 Assessment Area	33
4.6 Link Capacity Assessment	33
4.7 Junction Capacity Assessment	33
4.8 Means of Access	34
4.9 Framework Travel Plan	35
5.0 CONCLUSIONS	36

APPENDICES

APC/MB/A	Extracts of Institution of Highways and Transportation's " <i>Guidelines for Providing for Journeys on Foot</i> "
APC/MB/B	Appeal Decision 3254594
APC/MB/C	Bus Timetable X3

1.0 INTRODUCTION

1.1 Preamble

- 1.1.1 This Proof of Evidence (PofE) on Highways / Transport Issues has been prepared by Mark Baker of Mark Baker Consulting Limited (MBC) of 32 Montpelier Court, Station Road, Montpelier, Bristol BS6 5EA. I have a Bachelor of Science Degree with Honours in Civil Engineering from the Newcastle University. I am a Member of the Institution of Civil Engineers, a Chartered Engineer, and a European Engineer. I am a Fellow of the Chartered Institute of Transport, and of the Chartered Institute of Logistics and Transport.
- 1.1.2 I am a Director of MBC. I have been involved in the fields of transportation and traffic engineering since 1978. My experience covers the range from urban highway design to major transportation studies both in the UK and Overseas.
- 1.1.3 I have advised a wide range of clients including those in both the public and private sectors in the UK, and Overseas Government Agencies. I have recently advised with regard to the highways and traffic implications of a variety of residential, retail, commercial, leisure and office developments.
- 1.1.4 An appeal was lodged by the Dudsbury Homes (Southern) Limited in November 2023 in respect of the refusal by Dorset Council (the Council) of a planning application, the Council's reference being P/OUT/2023/01166, on 7th July 2023 for a mixed-use development located on land described as being to the south of Ringwood Road, Alderholt.
- 1.1.5 The planning application proposal is summarily for:
- i) Up to 1,700 dwellings with 35% affordable,
 - ii) A business park of 10,000 sq. m,
 - iii) A village centre with associated retail, commercial, community and health facilities, including 400 sq. m of convenience store, 858 sq. m comparison retail, 673 sq. m of food and drink, 316 sq. m of indoor sport/ recreation / fitness , 724 sq. m of medical or health services plus 1,026 sq. m of offices
 - iv) Open space including the provision of suitable alternative natural green space,
 - v) Biodiversity enhancements,
 - vi) Solar array, and
 - vii) New roads, access and associated infrastructure.
- 1.1.6 The planning application is in outline with all matters reserved for future determination apart from the vehicular site access off Hillbury Road.

- 1.1.7 No other vehicular access including off Ringwood Road, nor the pedestrian linkages into the adjoining development generally to the north are to be determined at this stage, which by itself creates a high degree of uncertainty regarding the “*permeability*” of the site, and its ultimate relationship to the remainder of Alderholt. The site itself summararily is located to the south and west of Alderholt and is of the order of 122ha in size currently in agricultural use. At present, there are no substantial levels of movement generated by or attracted to the site i.e.: it has been assumed as substantially a nil current traffic generator, and this is reasonable. To the north the site adjoins the existing settlement of Alderholt.
- 1.1.8 The planning application had been considered at the Council’s Committee on the 5th July 2023. The planning application was refused consent on the 7th July 2023 with a total of nine reasons for refusal, which are summarised below as directly relevant to my PofE.
- 1.1.9 I have been appointed by Alderholt Parish Council (APC) to prepare this PofE on Highways / Transport Issues on its behalf. A number of other Parish Councils are objecting, and therefore to avoid confusion I have referred to Alderholt Parish Council as APC as opposed to the Parish Council. I am familiar with the site, the surrounding highway network, and general traffic conditions on the adjacent and surrounding highway network.
- 1.1.10 In preparing this PofE I considered a number of documents including the various submitted objections, the Transport Assessment (TA) [CDA.19], the TA Addendum (TAA) [CDA.98], and the Travel Plan (TP) [CDA.20], and in addition the consultation responses of the Council’s highways department as set out in the Committee Report [CDA.75].
- 1.1.11 The evidence which I have prepared and provide for the appeal, reference APP/D1265/W/23/3336518, in this PofE is true and has been prepared and is given in accordance with appropriate guidance of my professional institutions. I confirm that the opinions expressed are my true and professional opinions.
- 1.1.12 The matters not at dispute on transport matters between the Appellant and the three highway authorities are I understand to be set out in a Transport Topic Paper in due course, and APC have not had input prior to preparing this PofE in that process. APC do not demur from any of three highway authorities regarding the wider impact of the proposal.

1.2 The Reasons for Refusal

1.2.1 My PofE is only concerned with Highways / Transport Issues. In particular part of the second reason for refusal relating to the proposal being unsustainable development contrary to the Council's settlement hierarchy, and the seventh reason for refusal relating to the lack of demonstration that there would not be an unacceptable traffic impact both on the local and wider highway network and the implications consequently for highway safety.

1.2.2 The second reason for refusal indicates:

“The proposed development would represent significant development contrary to the settlement hierarchy, which is intended to direct development to the most sustainable locations. While facilities and transport options are proposed, it has not been demonstrated that these would be successful and viable in the long-term. It has therefore not been demonstrated that the proposal would limit the need to travel and offer a genuine choice of transport modes. Contrary to Policy KS2 of the Christchurch and East Dorset Local Plan: Part 1, 2014, and to paragraphs 73 and 105 of the NPPF.”

1.2.3 With regard to this second reason for refusal, the “settlement hierarchy” aspect is addressed fully in the PofE of Jo Witherden BSc (Hons) DipTP DipUD MRTPI of Dorset Planning Consultant Limited. My PofE considers the issue of distances to facilities, and whether this proposal would offer a “genuine choice of transport modes” to travel to facilities both within the settlement, and to facilities outside the settlement.

1.2.4 The seventh reason for refusal indicates:

“The submitted Transport Assessment fails through the use of an unacceptable methodology and the inclusion of insufficient information to correctly identify the highways impacts arising from the proposal and how these could be mitigated. It has not been demonstrated that there would not be an unacceptable impact on highways safety, nor that residual cumulative impacts on the road network would not be severe. Contrary to Policy KS11 of the Christchurch and East Dorset Local Plan: Part 1, 2014, and to paragraph 111 of the NPPF.”

1.2.4 Summarily the TA [CDA.19] submitted was considered by all three highway authorities to be insufficient for them to fully identify the transport effects of the development and the necessary mitigation measures. Consequentially the deficiencies in the TA [CDA.19] failed to demonstrate that the proposed development would not have an

unacceptable impact on highways safety, or that the residual cumulative impacts on the road network would not be “severe”. Since the appeal was submitted, the appellant has provided additional information to seek to address the deficiencies of the TA [CDA.19]. The additional information submitted in the form of a TAA [CDA.98] has not overcome this reason for refusal.

- 1.2.5 A draft Statement of Common Ground (SofCG) [CDC.1] dated March 2024 had originally been produced by the appellants to inform the appeal process. The SofCG indicated the expectation of individual topic based SofCG but as set out at paragraph 1.1.12, the matters not at dispute on transport matters between the Appellant and the three highway authorities are I understand to be set out in a Transport Topic Paper in due course, and APC have not had input prior to preparing this PofE in that process.
- 1.2.7 I am aware through my liaison with Entran who are the Council’s highways / transport consultants for the appeal that whilst there is a degree of technical agreement with the appellant that a revised and separate SofCG on Highways / Transport Issues (SofCGHT) has not been agreed at the time of preparing my PofE. I should stress that I do not wholly rely on the Council’s evidence on the areas within my discipline / expertise and present my technical concerns on behalf of APC within this PofE. In due course, there may be elements of commonality that may allow a truncation of the evidence.
- 1.2.8 It is furthermore my understanding that the appellant intends to rely on the originally submitted TA [CDA.19] to define the impact of the proposal apart from the A31 / B3081 junction where the TAA [CDA.98] applies. The additional liaison with the Council, Hampshire County Council (HCC), and National Highways (NH) that has taken place in order to address the issue of “*insufficient information*” has been to provide what the appellants have referred to, I understand, as effectively a “*sensitivity test*”. I will later detail that limited reliance can be placed on that initial data contained within the submitted TA [CDA.19] for various identified reasons elaborated within this PofE, and as such that no weight should be attached to the original TA [CDA.19] in respect of the RforR7
- 1.2.9 I consider salient points from the Council’s Committee Report [CD.75] and the various Statement of Cases [CDC.1 to CDC.5] in order to set the context for my detailed evidence. The Council’s Committee Report [CDA.75] is lengthy and includes a thorough presentation of the highways / transport issues in particular. I will not go into detail of every point raised on highways / transport issues by the Council as it is no part of APC’s concern that the Council have got the fundamental reasons for refusal

incorrect. A summary of the Council's position under the heading "Key Planning Issues" at section 4.0 in the Committee Report [CDA.75] indicates of highways and transport relevance:

"Substantial concerns regarding fundamental aspects of the submitted Transport Assessment particularly trip generation. Insufficient work submitted to demonstrate impacts and deliverability of improvement works. Proposed local centre not optimally located and uncertainty regarding deliverability. Bus service would have limited impacts due to dispersed patterns of travel and viability not demonstrated. Significant weight attached to failure to demonstrate highways impacts and mitigation."

1.2.10 The Appellant's SofC [CDC.3] dated November 2023 at paragraphs 2.30 to 2.32 indicates:

"The reason for refusal states that the Transport Assessment (TA) fails through the use of an unacceptable methodology and the inclusion of insufficient information to correctly identify the highways impacts arising from the proposal and how these could be mitigated, and that it has not been demonstrated that there would not be an unacceptable impact on highways safety, nor that residual cumulative impacts on the road network would not be severe.

There is nothing in the Local Highway Authority's (LHA) response, or in a subsequent meeting with them that corroborates that the TA uses an unacceptable methodology. Engagement with the LHA has continued post refusal, and it is considered that regarding technical details these can be satisfied. Agreement can be secured through a SoCG.

It will be demonstrated that the residual cumulative impacts on the highway network will not be severe, that there are no unacceptable safety impacts, and that Policy KS12 requirements are met. This includes demonstrating excellent opportunities for walking and cycling and the provision of public transport, funding of which can be secured through s106. The provision of services and facilities for the community will enable day to day needs to be met locally, thus reducing trips from both existing and future residents."

1.2.11 By any reasonable consideration of the wording of the Appellant's SofC [CDC.3] paragraphs 2.30 to 2.32, I simply cannot reconcile this view. Whether it is appropriate

to use the word “*methodology*” is a moot point as the TA [CDA.19] appears to be in a format frequently considered appropriate in terms of the issues considered however there are significant reservations as I explore in section 4.0 of this PofE regarding the “*building blocks*” of the assessment namely the trip rates used, and the issue of “*internalisation*”. The proposal is, in my opinion, and that view is shared by many others, not well located other than for leisure trips by walking or cycling. What is abundantly clear as set out in the Council’s Committee Report [CDA.75] at paragraph 16.114 is that:

“Concerns regarding the approach and assumptions within the Transport Assessment have been raised by National Highways, the Dorset Highways Authority, Hampshire Highways Authority, Parish and Town Councils, local community groups and individuals.”

1.2.12 Needless to say, APC are just one of many such organisations raising such concerns. The stance of the Council from a highways / transport stance is that:

“regardless of the level of self-containment that can be achieved, as the development is isolated and without sustainable transport options, a large proportion of trips would be external, car-based and of medium to long distance.”

1.2.13 The Council’s Committee Report [CDA.75] at paragraph 16.161 indicated:

“The submitted TA is fundamentally flawed and consequently does not correctly identify the highways impacts arising from this proposal. It therefore cannot demonstrate that it mitigates its impacts. In addition, there is insufficient information to demonstrate that those mitigation measures which are proposed can be delivered. This carries significant weight against the proposal.”

1.2.14 Furthermore the Council accept that:

“The applicant acknowledges that the existing settlement of Alderholt does not currently represent a sustainable settlement, being heavily reliant upon car travel and with ‘very limited services and facilities’ which require residents to travel to meet their daily needs. The limited community bus service, and distance and suitability of road connections for walking and cycling do not currently provide genuine alternatives to the private car.

As such it is considered that, as is, this location is not one which would not represent sustainable development. Significant development would

therefore be contrary to paragraph 105 of the NPPF, unless Alderholt can be 'made sustainable'. To be made sustainable paras. 73 and 105 reference 'limiting the need to travel', 'offering a genuine choice of transport modes' and being 'supported by the necessary infrastructure and facilities'; it is considered the application would need to satisfactorily evidence that all would be achieved.

It is considered that to demonstrate a genuine choice of transport modes, the application would need to evidence sustainable transport options including via public transport and walking/cycling to higher order settlements where additional facilities, services and employment opportunities are located. The closest 'higher-order' settlements are Verwood and Fordingbridge and it is considered it would be appropriate for genuine choices to exist for travel to each.

Overall, it is considered that the application has not evidenced the proposal would adequately limit the need to travel. Nor has it been evidenced that genuine choices of transport modes would be created and sustained. Alderholt does not provide the necessary infrastructure and facilities to support everyday needs and this situation would not be substantially altered by the proposal. The location is unacceptable for a development of this scale, contrary to paragraphs 73 and 105 of the NPPF, and this is attributed very significant weight."

1.2.15 There is reference in the Appellant's TA [CDA.19] to the site being submitted as part of the Council's "Call for Sites" process, but it was not included as a preferred option in the first draft of the Dorset Local Plan, and has not been included in the submitted Neighbourhood Plan. Therefore the site does not form any part of any development plan to which anything more than very limited weight can be attached as indicated in the PofE of Jo Witherden.

1.2.16 In essence, my PofE is founded on the fact that there may be technical issues that may be assessed by reference to further assessments provided by the appellants as a TAA [CDA.98] dated May 2024, but this does not demonstrate that the proposal at all locations does not have an unacceptable impact. The TAA [CDA.98] concentrates impact wise on the A31 / B3081 junction. At its most basic nothing alters the fact that this is simply an inappropriate level of development in this location running counter to the fundamental premise of encouraging access by non-car borne modes of transport. The lack of realistic use of non-car borne modes of transport for daily needs of travel

outside of the settlement then leading to additional pressure on the highway network in a number of directions both within Dorset, and Hampshire, and additionally on the strategic road network (SRN).

1.2.17 It is my understanding that following receipt of additional information including the TAA [CDA.98] since the appeal was submitted, the Council in its role as the local highway authority considers that the following matters are not in dispute:

Transport Assessment

- Vehicle trip distribution
- Trip Internalisation
- Traffic counts
- Junctions to be tested (study area within Dorset)
- The use and outcome of the PARAMICS modelling
- The use of TEMPRO
- Committed development
- Junction modelling scenarios
- Sensitivity assessments

1.2.18 HCC considers that the following matters are not in dispute:

Transport Assessment

- Committed development assumptions
- Use of Tempro

1.2.19 National Highways (NH) are the strategic transport authority responsible for the SRN only i.e.: in this case locally the A31. NH wrote to PINS on the 23rd May 2024 and confirmed that, subject to appropriate conditions and obligations, all matters would be resolved in respect of the strategic road network (SRN). NH's original response to PINS dated 6th March 2024 included a summary of their concerns which had included on page 3 concerns regarding the trip rates which NH has indicated:

“the appropriateness of the two-way vehicle trip rate per dwelling which we would expect for a development in this rural location to be circa 0.5 to 0.65 in the weekday peak hours, rather than in the range of 0.3 to 0.35 as predicted by the appellant.”

1.2.20 Additionally that *“assessment with only minimal levels (5-10%) of internalisation applied to demonstrate the assessment is robust and realistic”*, and also of trip rate relevance that:

“multi-modal trip rates to be revisited particularly with regards predicted bus passenger vales exceeding carrying capacity of the buses serving

the development.”

1.2.21 This led to the production of the TAA [CDA.98]. The NH response of the 23rd May 2024 indicated:

“National Highways and the appellant’s consultants have continued to maintain a constructive dialogue and National Highways is now able to advise that the assessment of traffic impact and modelling developed by the appellant in respect of the SRN has been agreed.

This assessment has identified that a scheme of works at the A31 / B3081 Verwood Road junction is necessary to address an adverse development traffic impact on the SRN and associated local highway network which would otherwise be considered unacceptable or severe (in safety and capacity terms) in accordance with the NPPF.”

1.2.22 Whilst NH accept the impact on the SRN, they are not the highway authority for all other roads and junctions with the study area. As such, both the Council and HCC appear to consider that the impact on either County’s highway network has not been demonstrated.

1.2.23 It is my understanding that separate to the concerns of APC, that Action4Alderholt (A4A) consider that: the wider Paramics modelling was restricted to junction performance only and does not address other issues which can result in increased delays. Consequently, A4A consider that the Paramics modelling cannot reasonably be called robust. This a rephrasing of part of Colin English’s of A4A’s PofE, as is the case for the commentary to paragraph 1.2.26.

1.2.24 It is my understanding that A4A had advised that the SATURN software package was inappropriate for rural road conditions and the Council acknowledged this and subsequently included some micro-simulation work using the Paramics software package.

1.2.25 A4A consider that there was no mechanism for calculating any delays which may occur on links between junctions due to increased volumes of traffic. There are narrow sections of road on the roads between the main study area and the three satellite study areas which can and do cause delays, but these were not considered in the study. A key feature of micro-simulation is that drivers’ behaviour can be included in the modelling and some traffic can be reassigned to alternative routes where delays are predicted on a segment of road, in the same way as drivers select alternative routes to suit traffic conditions. This cannot be assessed in the disjointed model where the

alternative route does not form part of the model. A4A elaborate on this issue casting overall doubt on the accuracy of the modelling exercise.

1.2.26 A4A have set out the errors and deficiencies in the traffic modelling carried out for the scheme using the Paramics software. There are several shortcomings and each of these results in a degree of underestimation of the potential adverse impacts. This is elaborated on further in A4A's evidence.

1.3 **Structure of my Proof of Evidence**

1.3.1 My PofE is hereafter structured as follows:

- i) Section 2 considers the national and local planning policy and guidance from a highways / transport perspective including relevant supplementary planning documents,
- ii) Section 3 considers the settlement hierarchy issues where directly relevant to the issues within my expertise i.e.: part of the second reason for refusal,
- iii) Section 4 considers the issue of traffic impact i.e.: the seventh reason for refusal, and
- iv) Section 5 presents my conclusions.

1.3.2 As I understand it was suggested to the Inspector at the CMC, that APC want to make sure that the Council are representing their interests in whole or in part to inform APC's evidence on a number of disciplines. In particular, APC would like to ensure that the traffic impact of the proposal has been taken account of.

1.3.3 From my perspective there appears to be chains of liaison that have quite rightly been established between the appellant, HCC and NH by Entran on behalf of Council. Whilst I do not imply any criticism, APC cannot be fully involved in all of that liaison between the Council, and the other highway authorities.

2.0 NATIONAL AND LOCAL PLANNING POLICY AND GUIDANCE

2.1 Introduction

2.1.1 This section considers the national and local planning policy and guidance from a highways / transport perspective including relevant supplementary planning documents;

2.2 NPPF (December 2023)

2.2.1 The NPPF sets out the Government's economic, environmental and social policies. It includes the "*presumption in favour of sustainable development*".

2.2.2 Section 5 "*Delivering a sufficient supply of homes*" considers large-scale development in paragraph 74 which indicates:

"The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

- a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;*
- b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*
- c) set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;*
- d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for*

supporting rapid implementation (such as through joint ventures or locally-led development corporations); and

- e) *consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.”*

2.2.3 Chapter 9 of the NPPF sets the aims and policies for “*Promoting sustainable transport*” under this heading paragraph 109 specifically relates to choosing the most appropriate locations for significant developments so that the location itself enables development to be carried out in a way that limits the need to travel and offers a genuine choice of transport modes. Importantly, paragraph 109 is not simply stating that developers should seek to make significant developments as sustainable as possible, irrespective of their location; it is stating that such developments should be directed to those locations which best enable sustainable travel behaviour. The measures proposed to promote sustainable travel behaviour as part of the appeal proposals, do not overcome the fact that the remote and rural location of the appeal site is just manifestly inappropriate for a significant development of this scale and would therefore fail to comply with NPPF paragraph 109.

2.2.4 Paragraph 108 indicates:

“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) *the potential impacts of development on transport networks can be addressed;*
- b) *opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) *opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) *the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) *patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.”*

2.2.5 Paragraph 109 refers to actively managing patterns of growth, and that significant development should be focused on locations which are or can be made more sustainable through limiting the need to travel and offering a genuine choice of transport modes. These paragraphs are mirrored to a degree in paragraph 114 that follows.

“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users;*
- c) (fill in)*
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*

2.2.6 NPPF paragraph 114 is failed in my opinion for the following reasons:

- i) In the context of bullet point a) whilst it is evident that some appropriate opportunities to promote sustainable transport modes can be taken up, given the type of development and its location as I interpret the obligations there will be limited bus services in the evening across the week, and no services on Sunday as such it will not be possible for residents to visit a restaurant by public transport, or to see a play or watch evening sports,
- ii) Whilst bullet point b) of safe and suitable access to the site can be achieved for all users that this is limited to the site access onto Hillbury Road alone which is the only access not reserved for future determination,
- iii) In respect of bullet point d) namely that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. My PofE will demonstrate that even on the lower trip rates advocated by the appellant that the A31 / B3081 is overcapacity with an RFC on several movements exceeding 1.0 compared to a design value of 0.85. It simply follows that at this junction alone that there will be a significant impact of the development.

2.2.7 Paragraph 115 indicates:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

2.2.8 Any unacceptable impact on highway safety would be sufficient to prevent development, but the effect on operational capacity (after mitigation) must be considered “severe” to warrant refusal. There is no generally agreed definition of “severe” in this respect but must be judged for each individual development and each location, on the site-specific conditions. The definition of “severe” rests with the decision maker which in this case is the Inspector.

2.3 **The Council’s Local Plan**

2.3.1 The Christchurch and East Dorset Local Plan (CEDLP) [CDD.1] policy KS9 sets out the Transport Strategy which states that:

“development will be located along and at the end of the Prime Transport Corridors in the most accessible locations and supported by transport improvements that will benefit existing and future communities”

2.3.2 Map 4.6 identifies the Prime Transport Corridors, and there are none in Alderholt parish.

2.3.3 CEDLP policy KS11 “Transport and Development” requires development to:

“be in accessible locations that are well linked to existing communities by walking, cycling and public transport routes.”

2.3.4 It also states that Councils will:

“influence development so that it reduces the need to travel, provides improved access to key services and facilities and promotes alternative modes of travel.”

2.3.5 The ability of a development to reduce the need to travel relates to two things namely the location of the development and the mix of uses. A development in a remote location, some distance from key services and facilities will, by its very nature, result in a greater level of travel than a similar development better located close to existing facilities. The necessary journeys for a development in a remote location will be longer. This results in a greater reliance on vehicular travel (and a failure to prioritise walking and cycling) and also means that the effect is not only a greater number of vehicle journeys, but a greater number of vehicle kilometres travelled. A better located development would be able to maximise walking and cycling, minimise vehicle journey numbers and minimise vehicle kilometres. The other part of reducing the need to travel relates to a well-considered development mix that provides a good quality mix of services and facilities as part of the development, thereby reducing the need for new

residents to travel elsewhere.

- 2.3.6 When policy KS11 refers to “*alternative*” modes of travel, it may be more appropriate to refer to sustainable modes of travel. This means prioritising walking and cycling as the first choice of travel and then facilitating high quality public transport across a wide catchment, consistent with the policies set out in the NPPF.
- 2.3.7 My PofE casts significant doubt as to whether the location of the proposed development will not minimise the need to travel, and that journeys outside the development will be longer and will have greater reliance on the private car.

3.0 SETTLEMENT HIERARCHY ISSUES

3.1 Introduction

- 3.1.1 This section considers the settlement hierarchy issues where directly relevant to the issues within my expertise i.e.: part of the second reason for refusal.
- 3.1.2 The main response to the second reason for refusal is contained within the PofE of Jo Witherden. I consider the issue of distances to facilities and whether this proposal would offer a genuine choice of transport modes to travel to facilities.
- 3.1.3 In summary on this issue, the appeal proposal does not adequately lead to self-containment of the village, and is likely to lead to considerable levels of out of village movements for access to a wide range of services, and facilities that residents can typically be expected to use on a regular daily basis. Such a proposal manifestly fails to offer a genuine choice of transport mode. Public transport benefits (including the proposed dedicated bus service) are highly unlikely to make any notable difference to the traffic levels and after the initial funding period there is nothing to ensure its long-term commercial sustainability.

3.2 Guidance

- 3.2.1 The “*Manual for Streets*” (MfS1) [CD] paragraph 4.4.1 indicates:

“Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes’ (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit and PPS13 states that walking offers the greatest potential to replace short car trips, particularly those under 2 km. MfS encourages a reduction in the need to travel by car through the creation of mixed-use neighbourhoods with interconnected street patterns, where daily needs are within walking distance of most residents.”

- 3.2.2 With regard to public transport MfS1 indicates at paragraph 6.5.4 that:

“Bus routes and stops should form key elements of the walkable neighbourhood. Designers and local authorities should try to ensure that development densities will be high enough to support a good level of service without long-term subsidy.”

- 3.2.3 The Institution of Highways and Transportation’s “*Guidelines for Providing for Journeys on Foot*” of which the relevant extracts are appended to this PofE as appendix APC/MB/A indicates at paragraph 3.30:

“Approximately 80% of walk journeys and walk stages in urban areas are less than one mile. The average length of a walk journey is one kilometre (0.6 miles). This differs little by age or sex and has remained constant since 1975/76. However, this varies according to location. Average walking distances are longest in Inner London. The main factors that influence both walking distance and walking time in a city or town centre appear to be the size of the city or town itself, the shape and the quality of the pedestrianised area, the type of shops and number of activities carried out. An average walking speed of approximately 1.4m/s can be assumed, which equates to approximately 400m in five minutes or three miles per hour. The situation of people with mobility difficulties must be kept in mind in applying any specific figures.”

3.2.4 Paragraph 3.31 indicates:

““Acceptable” walking distances will obviously vary between individuals and circumstances. Acceptable walking distances will depend on various factors including:

- An individual’s fitness and physical ability*
- Encumbrances, eg shopping, pushchair*
- Availability, cost and convenience of alternatives transport modes*
- Time savings*
- Journey purpose*
- Personal motivation*
- General deterrents to walking.”*

3.2.5 Paragraphs 3.36 indicates:

“Additional walking distances or gradients, can be crucial in determining whether a development is pedestrian friendly. Layouts that require pedestrians to walk through car parks or to follow indirect footpaths should be avoided as far as possible. These are issues that should be addressed jointly by planners and engineers involved in development control.”

3.2.6 Table 2 of the IHT Guidelines indicates suggested acceptable walking distances for pedestrians of:

	Within Town Centres	For Community / Schools	Elsewhere
Desirable	200m	500m	400m
Acceptable	400m	1000m	800m
Preferred Maximum	800m	2000m	1200m

- 3.2.7 It is prudent to consider these values and their interpretation at this point. This site falls into the “*elsewhere*”. For “*elsewhere*” the desirable distance to walk is 400m, the acceptable is 800m, and the preferred maximum is 1200m. For the walk to school, the desirable distance is 500m, the acceptable walk distance is 1000m, and the preferred maximum is 2000m.
- 3.2.8 On this basis very few, if any pedestrians would choose walking as their preferred mode of travel between Alderholt and Fordingbridge. The distance at 4.3km is nearly four times the maximum distance to facilities. The distance is too great and the high-speed nature of the B3078 given that the road is subject to the national speed limit would be a general deterrent to walking. Walking is only a realistic first choice for journeys within Alderholt itself. Verwood similarly is 4.6km away using a bridleway across Cranmore Common, and I wonder whether this will offer a safe all weather all time of day route.
- 3.2.9 The TA [CDA.19] acknowledges that with the exception of the bridleway and forestry tracks, there is no dedicated cycle infrastructure available within the vicinity of Alderholt and any cycling therefore takes place on carriageway. The TA [CDA.19] suggests Ringwood Road, Hillbury Road and Station Road may be suitable for on-carriageway cycling but beyond the settlement of boundary of Alderholt all local roads are subject to the national speed limit which is likely to act as a significant deterrent to all but the most experienced cyclists.
- 3.2.10 The remote location of the site is not well placed to promote journeys by bike without significant improvements to cycling infrastructure, which are not being offered. I am aware that the TA offered the “possibility” of upgrading footpaths connecting to Migham Lane to potentially allow cyclists to reach Fordingbridge via Migham Lane and Ashton Road. I am not aware that this can be achieved, and I understand that the viability both in terms of finance and land ownership need to be addressed. In any event, the distance to main settlements means that cycling is likely to be a secondary choice and not the first choice of transport for journeys outside Alderholt.

3.3 **Public Transport Services**

- 3.3.1 At the time of submission of the planning application, it was correct to indicate that the local area was currently served by a single bus service number 97 which ran along Station Road, Ringwood Road and Hillbury Road, using Earlswood Drive to connect

between Ringwood Road and Hillbury Road. This bus service only ran every two hours between 0934 and 1342 on Tuesdays, Wednesdays and Fridays only, and did not run on Saturdays or Sundays. When the 97 service was withdrawn in December 2023 the residents of Alderholt requested that APC investigate options to access Fordingbridge for facilities and services not available in Alderholt. APC liaised with Dorset Community Transport (DCT) , and the best option has been to provide a shuttle bus using a 16 seater minibus on a Wednesday only with 8 services between 09.15 to 13.55 on a turn up and go non pre bookable basis. In addition DCT provide a Plus Bus service on a pre booked basis to registered users once per day return to Salisbury on a Tuesday, Ringwood on a Wednesday, Blandford on a Thursday and Wimborne on a Friday. The services are interpeak only, and not suitable for employment or education purposes. The existing level of bus provision can be classed as poor as is it insufficient in frequency and duration to provide a viable option for travelling to and from work during the week, or to any main town for shopping or leisure at the weekends.

- 3.3.2 The TA acknowledges that the existing bus service in Alderholt is poor being limited to services in the interpeak period only, and for that reason the appellant therefore proposed to make a financial contribution to increase the frequency of buses between Cranborne, Alderholt, Fordingbridge and Ringwood. The appellant has consulted with a local operator who considered that an hourly service between 0700 to 1900 on weekdays, and every two hours on Saturdays, would be feasible though there are differences between the TA [CDA.19] and the TAA [CDA.98] in terms of what is being offered. The TA states that buses would route through the development via the proposed spine road potentially missing the centre of Alderholt.
- 3.3.3 With the timings of services proposed, as contained in the TAA [CDA.98) appendix D, it will not be possible for residents to visit a restaurant by public transport in the evening or at weekends or to see a play or watch evening sports. Notwithstanding the fact that Fordingbridge has a variety of restaurants, and a cinema.
- 3.3.4 There are buses for example to Fordingbridge and Ringwood direct from Alderholt, but the indicative timings of such means that whereas a trip there may be possible to both that there is no return service leaving Ringwood after 19.15, or Fordingbridge after 19.35. There is the potential for changing onto another service in Fordingbridge to access Salisbury, Ringwood or Bournemouth. From Fordingbridge the X3 service can be used subject to a wait. The TA refers to this Alderholt service being funded for 7 years.
- 3.3.5 The journey timings from Fordingbridge to selected destinations being:

Salisbury	32 minutes
Ringwood	12
Royal Bournemouth Hospital	31
Bournemouth Centre	53

Where the timings are the interpeak journey time that will be greater in the morning and evening peak periods.

3.3.6 The timings to and from Ringwood and Bournemouth based on Fordingbridge indicates:

	M-F	Sa	Su
First service to / from Bournemouth	06.59 / 06.50	07.09 / 07.10	09.05 / 08.05
Last service to / from Bournemouth	22.06 / 23.00	22.06 / 23.00	19.04 / 20.15
First service to / from Ringwood	06.59 / 05.52	07.09 / 05.57	09.05 / 07.51
Last service to / from Ringwood	00.31 / 23.30	00.31 / 23.32	22.01 / 20.52

3.3.7 However these are timings from Fordingbridge but if adjusted to Alderholt a very different level of service results viz:

	M-F	Sa	Su
First service to / from Bournemouth	07.30 / 06.50	07.09 / 07.10	
Last service to / from Bournemouth	20.30 / 18.30	20.30 / 18.25	
First service to / from Ringwood	07.30 / 06.15	07.30 / 06.15	
Last service to / from Ringwood	19.58 / 19.15	19.58 / 19.15	

3.3.8 The timings to and from Salisbury from Fordingbridge indicates:

	M-F	Sa	Su
First service to / from Salisbury	06.04 / 06.35	06.09 / 06.45	08.03 / 08.40
Last service to /from Salisbury	23.44 / 00.10	23.44 / 00.10	21.03 / 21.40

3.3.9 However these are timings from Fordingbridge but if adjusted to Alderholt a very different level of service results viz:

	M-F	Sa	Su
First service to / from Salisbury	07.30 / 06.35	07.30 / 06.45	
Last service to /from Salisbury	19.58 / 19.00	19.58 / 19.00	

3.3.10 It is also important to consider whether the journey times would be conducive to a trip, and I consider that in the context of journeys of the earliest and latest by destination viz:

a)	Fordingbridge		
		First	Last
	Depart Alderholt	07.30	Depart Fordingbridge 19.35
	Arrive Fordingbridge	07.50	Arrive Alderholt 19.58
	Journey Time	20	23

b)	Salisbury			
		First		Last
	Depart Alderholt	07.30	Depart Salisbury	18.30
	Arrive Fordingbridge	07.50	Arrive Fordingbridge	18.54
	Depart Fordingbridge	08.12	Depart Fordingbridge	19.15
	Arrive Salisbury	08.50	Arrive Alderholt	19.58
	Journey Time	80		108
c)	Ringwood			
		First		Last
	Depart Alderholt	07.30	Depart Ringwood	19.15
	Arrive Ringwood	08.10	Arrive Alderholt	19.58
	Journey Time	40		43
d)	Bournemouth			
		First		Last
	Depart Alderholt	07.30	Depart Bournemouth	18.00
	Arrive Fordingbridge	07.50	Arrive Fordingbridge	18.49
	Depart Fordingbridge	08.05	Depart Fordingbridge	19.15
	Arrive Bournemouth	09.00	Arrive Alderholt	19.58
	Journey Time	90		118

3.3.11 Furthermore, table 5 of the TA [CDA.19] shows a predicted 273 trips by bus in the morning peak hour and 78 trips by bus in the evening peak hour. Rather oddly the table also refers to “internal” trips implying that some residents will use public transport within the development itself. The values shown are 8% in the a.m. peak period by 37% in the p.m. peak. The TA fails to demonstrate how the predicted additional bus passengers could be accommodated on an hourly bus service. The appellant proposes to fund a bus service for up to 7 years, but the viability and long-term future of bus service provision cannot be guaranteed.

3.3.12 The development in the light of the above poor public transport frequency and timings would be likely to be reliant on the private car for access to other than the basic facilities that either exist in Alderholt currently, or that may be provided if the appeal were to be allowed.

3.4 **Appeal Decision**

3.4.1 On the issue of accessibility I refer to a relevant appeal decision, PINS reference 3254594, for a development of 70 dwellings in the settlement of Charlton Marshall located to the south of Blandford Forum. The decision is included in its entirety as appendix APC/MB/B. Charlton Marshall is a village with a population of 1,100 people

at the time of the appeal. Charlton Marshall lies essentially astride the A350 which provides access to the north to Blandford Forum, and to the south eventually to Poole.

3.4.2 The Inspector at paragraph 19 of her decision described the proposal as:

“Charlton Marshall has a village hall, a church, and a public house. There are no day-to-day facilities present in the village and occupants of the proposed development would need to travel in order to meet the majority of their day-to-day needs. The nearest shop is located 2km away whereas other services are some 2.8km distant in Blandford. “

3.4.3 Unlike Alderholt Charlton Marshall did not have an existing convenience store at the time of the appeal though within Blandford Forum there was a large Tesco, a discount food store, a large DIY store, and a diverse range of shops and services much greater than Fordingbridge which has a medium sized Coop and a Tesco Express. The footway linkages were detailed by the Inspector at paragraphs 20 and 21 thus:

“Two footways have been referred to as serving the appeal site: the first being the rural trailway to the south west of the site and the second the footpath along the A350 (to the north east).

Emphasis has been placed by the appellants on the sustainability credentials of the trailway which would be accessed directly from the appeal site. I walked the route from the appeal site which links to Wards Drove, another roughly surfaced path which then connects to the narrow footpath along the A350 towards Blandford. It was evident to me that the length, rural characteristics, roughly surfaced condition, and indirect route would be unlikely to provide a realistic or attractive alternative for most people to shop for provisions, to travel to work or to school, or to meet most of their day-to-day needs. This would be especially so in the hours of darkness or in inclement weather or for use by the elderly, or those with mobility limitations.”

3.4.4 The decision at paragraph 22 is highly applicable to Alderholt:

“Although car journeys between the site and Blandford would be relatively short, this form of transport would be relied upon for access to other services and facilities, which are some distance away. As a result, the site does not exhibit strong credentials in respect of accessibility to services on foot.”

3.4.5 It is prudent to note that Alderholt’s relationship to Fordingbridge is somewhat greater at 4.3km compared to the 2.8km distance from Charlton Marshall to Blandford Forum.

For further comparison in terms of its location to larger settlements Charlton Marshall is 23km north west of Bournemouth, 25km north east of Dorchester, 36km south east of Yeovil and 36km south west of Salisbury.

3.4.6 In my opinion that would, despite the proposed facilities in Alderholt, still apply. Furthermore paragraph 23 indicates:

“Despite plans to fund £44,000 of improvements to the trailway it would not provide a sustainable method for all potential future occupiers to access facilities. An enhanced contribution of £250,000 is referred to in the submitted UU. However, this figure would relate to improvements to the trailway in the opposite direction towards Spetisbury. Notwithstanding the level of expenditure, future upgrades would not shorten the distance nor reduce the reliance on the private car in order to access day-to-day services and facilities.”

3.4.7 The Inspector then at paragraph 24 indicated:

“The alternative footpath along the A350 also has significant limitations. It is only on one side of the A350 and for a large proportion of its length it is particularly narrow. For people to pass one another, one person would be forced to step onto the highway. As this is a busy “A” class road which is heavily trafficked such manoeuvres would be extremely hazardous, especially for the elderly or for pedestrians with young children.

3.4.8 Paragraph 25 indicated:

“These factors are likely to render the routes identified unattractive for most day-to-day trips by pedestrians or cyclists. Given these factors and the distances involved, the routes would not form realistic options for occupants of the proposed development to walk or cycle at all times of the year and not in the hours of darkness or in inclement weather.”

3.4.9 On the issue of access by foot or cycle from a development much better related to an adjacent settlement, the Inspector’s conclusions were very clear.

3.4.10 The Inspector then considered access by bus to other localities at paragraph 26 indicating:

“There is an hourly bus service to Blandford with the bus stops located close to the proposed entrance to the site. However, the bus service does not run in the early morning and is limited in the early evening. This

presents clear limitations for access to services and facilities and would not necessarily be convenient for school children, commuters or people wishing to access day-to-day amenities. Whilst the appellants state that Blandford is accessible by bus within 10 minutes this refers to the duration of the bus journey and not the frequency of the service which would limit the convenience with which day-to-day needs could be met.”

- 3.4.11 In this case, there are some minor differences in so far as Fordingbridge would be using the indicative timetable be 20 minutes away using the timing point of Earlswood Drive for both peak and interpeak services which is double that of Charlton Marshall. If the service as suggested by the TAA [CDA.95] could be routed to serve the proposal directly then this would have two potential consequences of making it less convenient to potential users along Earlswood Drive, and if it serves the route suggested by the indicative timetable plus the proposal directly then the overall journey time would increase, which would self-evidently be less attractive.
- 3.4.12 Furthermore, the services at Alderholt even to Fordingbridge would be limited in the evening. For Charlton Marshall, there was no requirement to change onto a service as the X8 runs from Blandford Forum to Poole with a journey time to Poole of 30 minutes during the interpeak periods. That service runs from 08.14 hourly to Blandford Forum until 19.26 on Monday to Friday and 09.19 to 19.26 on Saturdays with two hourly service on Sundays from 11.24 to 17.58, with services operating from Poole from 07.45 to 18.50, and 08.50 to 18.50 on Saturdays, and 10.50 to 17.20 two hourly on Sundays. From Blandford Forum operating hourly from 06.58 to 17.53 on Monday to Friday, 07.53 to 17.53 on Saturdays, and 09.50 to 16.20 on Sundays, and to Poole from 07.05 hourly to 18.00, and Monday to Friday, 08.00 to 18.00 on Saturdays, and 09.54 to 16.29 operating two hourly.
- 3.4.13 Summarily on this point, the distance to the largest settlement is much less at Blandford Forum though with a similar public transport service i.e.: hourly at Alderholt in the interpeak periods and hourly at Charlton Marshall.
- 3.4.14 At paragraphs 27 to 29, the Inspector concluded on accessibility indicating that:
- “The appellant’s concede that the village does not have day-to-day facilities but argues that the strong functional relationship overcomes that deficiency. Paragraph 78 of the Framework also states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Where*

there are groups of smaller settlements, development in one village may support services in a village nearby.

However, the site's location adjacent to a village with only a very small number of facilities of its own, limits the potential for the proposed housing to carry any particular health, social benefits, or convenience for future occupants. Residents are therefore likely to be car dependant to meet their needs; a factor which weighs heavily against the scheme. In this regard the proposed development would have insufficient accessibility by sustainable modes to be considered a sustainable location for development.

Consequently, taking all these factors into account, the development would not represent a suitable location for housing having regard to accessibility to facilities by sustainable modes of transport. The proposal would conflict with Policies 1, and 2 of the NDLP and to the aims of the Framework at paragraph 9 and 108. These Policies seek, amongst other things, to concentrate development in sustainable locations, directing it to the main settlements in order to minimise the need to travel.”

3.4.15 Under the heading “Conclusions” paragraph 68 indicates:

“For the reasons given above the appeal scheme would conflict with the spatial strategy for the area, would result in unsustainable travel patterns and a reliance on the use of the private car, would be harmful to the character and appearance of the area, the character and appearance of the CA and the setting of the Grade II listed Old Dairy Cottage. Whilst the scheme would provide notable public benefits, including the provision of much needed market and affordable housing, the other material considerations in this case do not justify taking a decision other than in accordance with adopted development plan policy.”

3.5 Overall Site Location

3.5.1 The distances involved clearly indicate that with a potential sparsity of employment opportunities within Alderholt and its immediate environs that residents will be forced to drive between 23km and 36km for a wider choice of employment opportunities, and that by any reasonable definition cannot be classed as sustainable development. Whilst, there are bus services to Bournemouth, and Salisbury from Fordingbridge the journey time to either means that their use in preference to the car would not be attractive due to the limited early and late services, and the overall journey time.

3.5.2 Overall, the proposal cannot be said in the context of the NPPF paragraph 109 to:

“be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”

3.6.3 Consequentially there is considered to be a “severe” impact of the proposal in the context of the NPPF [CD] paragraph 114.

4.0 TRAFFIC IMPACT ISSUES

4.1 Introduction

- 4.1.1 This section considers the issues relevant to the seventh reason for refusal namely summarily traffic impact.
- 4.1.2 The matters not in dispute on transport matters between the Appellant and the three highway authorities are I understand to be set out in the Transport Topic Paper, and a document that APC have not input into prior to preparing this PofE. However, I on behalf of APC do not demur from any of three highway authorities regarding the wider impact of the proposal.
- 4.1.3 I understand that through discussions with the Appellant and via the TAA, [CDA.95] the Appellant has proposed a sensitivity test, using higher trip rates and lower internalization in line with the NH request and this lower trip rate has been accepted as being appropriate.
- 4.1.4 Furthermore though it is my understanding that the Appellant rather perversely has used different levels of trip reductions for NH modelling when compared to that used for the modelling of both the Council's and HCC's highway network, and as such the modelling undertaken to date apart from the A31 junction remains flawed and could significantly underestimate the traffic impact of the development particularly in Fordingbridge. I understand that HCC have requested additional modelling.
- 4.1.5 Section 8 of the TA [CDA.19] is entitled "*Highway Impact Methodology*". This sets out the baseline traffic scenarios that were used to inform the traffic impact assessment. It then describes the assessment scenarios being:
- 2021 Base Year
 - 2027 Forecast Year
 - 2027 Forecast Year plus 500 dwellings)
 - 2033 Forecast Year
 - 2033 Forecast Year plus Development
- 4.1.6 These assessment scenarios were agreed by the Council, and includes some future year assessments but not any beyond anticipated completion of the last unit. Regardless of the level of self-containment, a large proportion of trips will be external, car-based and medium to long distance. This is because the development is not in a sustainable location from a transport perspective. These problems would not potentially exist if the development location was closer to a larger settlement with a greater range of services which people could access via a genuine choice of modes. HCC do not consider the trips rates robust. As set out in HCC's response dated 9th May 2023, the

trip rates proposed, and hence the forecast traffic generation, are substantially lower than those agreed for other developments in the area, which are all closer to town centres with a broader range of amenities than the Alderholt site. As such, HCC believed that the development impact is underreported. Justification of the trip distribution has not been provided and as such, may lead to underreporting of the development impact in some locations. HCC consider that the mitigation proposals at Provost Street / High Street junction are not considered adequate to address the site impact, particularly given the development impact is underreported, with significant congestion and delays resulting from the proposed development representing an unacceptable and a severe impact on Hampshire's highway network, and capacity modelling has not been provided at Salisbury Road/Bridge Street mini roundabout and Station Road/Normandy Way junctions. The unmitigated impact at these locations could be severe; and further investigation was required.

- 4.1.7 NH's primary concern relates to the A31 trunk road, particularly the A31 / Verwood Road junction. Collisions at the A31/Verwood Road junction all occurred in a similar manner which highlights the importance of ensuring that the proposed highways works are sufficient and suitable. A robust sensitivity test is needed for the A31 / Verwood Road junction including only minimal levels (suggested as between 5 to 10%) of internalisation flows within the site
- 4.1.8 All three highway authorities concur that the existing village of Alderholt is generally reliant on travel by car to neighbouring settlements. All three highway authorities consider the vehicle trip generation predictions in the TA to be low and the predicted internalisation assumptions to be overly optimistic. The Council and HCC consider the level of information submitted in the TA with regards to off-site transport improvements to be insufficient to provide the necessary level of certainty that those works can be delivered. Even with low vehicle trips and high trip reduction assumptions, HCC still object to the level of traffic impact in Fordingbridge and do not accept the proposed mitigation measures.

4.2 **Trip Rates**

- 4.2.1 The first issue to consider is trip rates for the logic that all of the other elements of traffic impact rely on a reliable trip rate value either vehicle only or multi modal.
- 4.2.2 The TA uses TRICS which is an industry standard tool for trip generation either in a vehicle only or multi-modal mode.
- 4.2.3 The selection process in the TA should on the basis of the TRICS Good Practice Guide guidelines exclude sites that would be unrepresentative in terms of size of the

development whilst ensuring that the overall sample size is not too small. The TRICS data only includes edge of town sites within the development range size of 100 to 2000 dwellings with the actual range been between 151 to 918 units. For the business park element edge of town sites and neighbourhood centres were included with sites selected by GFA in the range 2,500 to 15,000 sq. m with the actual range being 2,900 to 5,000 sq. m. There was no separate assessment for the traffic or movement generation of the other elements of the proposal, which has to be considered unreasonable, and an underestimate of overall traffic generation.

4.2.4 I have considered the sites selected by the appellant, and as such whether those sites have any other facilities within them that may already allow for an element of “*internalisation of trips*”. This is important because the values from TRICS are “*garden gate*” values, and as such it is likely that for the medium / larger sites that this will already have some facilities within the various TRICS estates selected i.e.: a corner shop, other facilities, schooling or indeed a combination of all of those. In this manner, it could be erroneous to discount trip rates further if facilities are to be provided on site as the appellants have above.

4.2.5 The TRICS sites selected being:

- a) Residential
 - Buntingford
 - Herne Bay
 - Scunthorpe
 - Great Yarmouth
 - Stafford
 - Horsham
 - West Horsham
- b) Business Park
 - Colchester 1
 - Colchester 2
 - Lincoln
 - Bromsgrove

4.2.6 From consideration of the sites selected in the TIR [CDA.19], none of the selected sites include other traffic generators such as shops, health centre or sporting facilities, and as such it would on “face value” have been reasonable to use with the trip rates so derived being:

	Residential	Business Park
	Per unit	Per 100 sq. m GFA
	Arr / Dep / Two way	Arr / Dep / Two way
AM peak 08.00 to 09.00	0.144 / 0.412 / 0.556	1.998 / 0.359 / 2.357
PM peak 17.00 to 18.00	0.366 / 0.163 / 0.529	0.353 / 1.651 / 2.004
Daily 07.00 to 19.00	2.300 / 2.300 / 4.621	8.467 / 8.572 / 17.039

4.2.7 The vehicle movements so derived being :

	Residential	Business Park	Totals
	1700	10,000 sq. m GFA	
	Arr / Dep / Two way	Arr / Dep / Two way	Arr / Dep / Two way
AM peak			
08.00 to 09.00	245 / 700 / 945	200 / 36 / 236	445 / 736 / 1181
PM peak			
17.00 to 18.00	622 / 277 / 899	35 / 165 / 200	657 / 442 / 1099
Daily			
07.00 to 19.00	3910 / 3910 / 7820	847 / 857 / 1704	4757 / 4767 / 9524

4.2.8 These values take no account of the local centre traffic generation / attraction. Put simplistically the appellants have not taken account of all elements of the proposal assuming that the local centre etc will not generate any external trips whatsoever then appear to have added the residential to business park incorrectly then applying a discount for internalisation which may have by itself been fair but not if you've not included all elements of the development to begin with.

4.2.9 HCC stance had been that the site is an unsustainable location with poor road connections and that consequentially there is an impact on HCC roads. In detail HCC had indicated with regard to trip rates that the comparison of the appellants values to their calculated was of 510 compared to 1309 in AM and 884 compared to 1284 in PM though the HCC trip rates were based on better located / more sustainable sites in Fordingbridge and Ringwood.

4.2.10 Additionally that HCC had concerns regarding trip distribution, that the junction modelling was not robust, with the mini roundabout in Fordingbridge excluded from the assessments and base survey data query about its robustness due to its age. These concerns of HCC mirror the concerns of APC, and the Council. The appellants had undertaken additional surveys to satisfy NH in August 2024 according to the TAA [CDA.98].

4.2.11 NH stance is also with regards to the trip rates contained in the submitted TA of 0.3 to 0.5 at peak hours compared to NH's assessment of 0.5 to 0.65, which represents a

significant order of magnitude difference. As such NH argued that the A31 / B3081 junction impact which is on the SRN had not been proven given the data age, plus trip rates issue though NH had also indicated that all issues could be capable of being resolved. Effectively, the actual traffic impact at the external junctions may be double that assessed, and this has now been assessed as part of the TAA [CDA.98].

4.2.12 The TAA reconsidered the TRICS data, but did not alter the TA assumptions arguing that:

“The methodology and assumptions used in the TIR were agreed with DC at pre-app stage.”

4.2.13 I was clearly not involved at that stage but assess whether the values used for assessment are reasonable or whether they are “*flawed*”. Notwithstanding the TAA [CDA.98] comments above, the TAA in fact for the SRN reassessed trip rates, and assessed a “*sensitivity test*” with trip rates of 0.5 to 0.65, and internalisation of 5% to 10% but still didn’t add in the local centre. Is it really reasonable to assume no external use whatsoever of such facilities? The resultant two-way flows of 1,122 in the a.m. peak and 1,071 in the p.m. peak being significantly closer to the values suggested by HCC and NH in particular.

4.2.14 However the TAA [CDA.98] indicates at 5.10 with regard to the values above:

“the above sensitivity trip rates have also been used in revised modelling assessments of the junctions in Dorset and Hampshire. The only difference in respect of trip generation is that reductions to existing vehicle movements have been kept within the sensitivity analysis within Dorset and Hampshire, on the basis that the provision of amenities and facilities within the development would be likely to reduce local trips, rather than those to the A31, which is remote from the appeal site.”

4.2.15 In essence, I cannot reconcile why a junction with an impact of 35% of vehicle trips of the order of 393 vehicles in the a.m. peak and 375 vehicles per hour in the p.m. peak should not be assessed because it is “*remote*”. The impact values at this junction being in excess of an additional 6 vehicles per minute.

4.2.16 Furthermore unless I am completely misunderstanding the commentary, higher levels of internalised are applied to junctions tested within Dorset and Hampshire compared to the SRN.

4.3 Internal Trips

4.3.1 A key issue as such is the internalisation and the deletion of existing trips with the AM peak hour their “*garden gate*” values of 841 vehicles per hour becoming 510 vehicles

per hour and in the PM peak hour with their 1052 vehicles per hour becoming 884 vehicles per hour using the appellant figures. The values from the “*Trip Internalisation Report*” (TIR) which is appendix L of the TA [CDA.19] being aggregated as 1181 and 1099 in the a.m. and p.m. peaks respectively, which appears to be an underestimation to begin with.

- 4.3.2 There appears to be a view proffered by the appellant that a greater percentage of trips within the village will be made without the use of a private car, and this has led to the so called concept of “*internalisatoion.*”
- 4.3.3 There is a degree of uncertainty timing wise with the business park element. In a “*utopian world*”, the proposed business park would be ideal if it could be wholly built and occupied by all of the new residents but this simply cannot be controlled, or conditioned. Furthermore, the types of occupiers on the business park cannot be assessed or defined at this stage. The skill basis of residents, and potential employers may not align.
- 4.3.4 If such occupation could be controlled then an element of internalisation could apply. Provided at the outset before residential development means that the employees at the business park located in Alderholt will potentially be travelling from either the village or other settlements within the area. I have to acknowledge that such employees may well have a shorter trip than to another location where they may have employment, but in that case the residents of the new houses would have to seek employment out of the locality. Either way it is highly likely that the high levels of internal trips contained in the TIR will not be realised. NH had suggested for assessment purposes a value much lower than the TIR advocated though as detailed subsequently the TAA only applied this reduced internalisation to the SRN rather than for all junctions assessed, which is rather illogical.

4.4 **Trip Distribution**

- 4.4.1 The trip distribution originally used was based on the journey to work 2011 Census data of Alderholt residents that was applied to all trip purposes but that may not be wholly appropriate for every single trip purposes and is summarised as:

- a) East
- | | |
|--------------------------|-----|
| B3078 Fordingbridge Road | 19% |
| Saddleheath Road | 19% |

b)	South		
	Harbridge Drove		35%
	then A31 East	14%	
	A31 West	21%	

c)	West		
	Daggons Road		27%

4.4.2 This trip distribution with its potential flaws merely highlights the fact that for many trip purposes that longer distance trips away from the village will be required. This is, self-evidently, inevitable for such a sized proposal in this location, and this manifestly runs counter to be principle of reducing the need to travel. The TAA [CDA.98] applied this distribution to the SRN, and that was accepted by NH.

4.5 **Assessment Area**

4.5.1 The detailed list of junctions to be assessed cannot be reasonably defined until the trip rates and distribution are agreed, and there has been concerns raised by HCC in particular.

4.5.2 There are in my opinion notable exceptions that appear somewhat “odd” not to have been assessed such as B3081 / Harbridge Drove junction, and the mini roundabout in the centre of Fordingbridge of Salisbury Road / Bridge Street / High Street with HCC also indicating concerns at the Station Road / Normandy Way junction which had not been assessed.

4.5.3 The TAA [CDA.98] assessed the further junctions.

4.6 **Link Capacity Assessments**

4.6.1 The character of the various local roads likely to be used to reach local and wider destinations is covered in the Poe of A4A.

4.6.2 I do not unduly repeat the descriptions of A4A based on their local knowledge, which I do not demur from.

4.7 **Junction Capacity Assessments**

4.7.1 Capacity assessment as submitted in the TA [CDA.19] and the TAA [CDA.98] with the technical concerns regarding trip rates show using the appellants own assessment that the A31 / B3081 junction would operate well above the RFC (ratio of flow to capacity) value of 0.85 usually regarded as the “design capacity” at 1.0 on several arms with in my opinion significant queuing and delays that will compromise highway safety.

4.7.2 Whilst not criticising NH there are two movements on the SRN at the A31 / B3081 junction that have RFCs well above a value of 1.00 in the a.m. peak hour, and similarly in the p.m. peak hour. There is one movement stream predicted to operate at almost

double capacity with a queue in 2027 with only 500 units added of 185 vehicles compared to existing predicted queue of 45 vehicles based on the existing layout. As such, it was very reasonable to provide mitigation. Without mitigation, this is bound to compromise highway safety without further mitigation. However, the assessments with mitigation are only to 2027 plus 500 units then there should still be concerns with 50% of the movements at the junction which operate on the B3081/ A31 off slip, and Verwood Road West in excess of the 85% design value with only less than a third of the development added.

4.8 **Means of Access**

- 4.8.1 The site access that is not reserved for future determination lies on Hillbury Road. Hillbury Road runs from north to south and provides connections from Alderholt towards Ringwood and the A31 approximately 8km to the south. Hillbury Road can also be broadly categorised into two sections. From the edge of the settlement northwards, the speed limit is 40mph, reducing to 30mph just before Windsor Way. Within Alderholt, Hillbury Road provides access to a number of residential side roads and direct access to residential properties. A footway is provided on the western side of the carriageway and further north, occasional street lighting is provided. At its northern end, Hillbury Road meets Station Road (B3078) at a priority junction. South of Alderholt, Hillbury Road is rural in nature; it measures approximately 6m in width and is subject to the national speed limit. It has no street lighting or footways.
- 4.8.2 Station Road forms part of the B3078 which runs between Cranborne to the west and Fordingbridge to the east. Within Alderholt, Station Road has direct frontage access to a number of residential properties as well as via residential side roads. It measures approximately 6m in width, is subject to a 30mph speed limit, has street lighting and footways along both sides of the carriageway for the majority of its length.
- 4.8.3 Between Alderholt and Fordingbridge, the B3078 is an inter-urban rural road, with no footways or street lighting and is subject to the national speed limit up to Ashford Road from where it is subject to a 40mph speed limit. As evidenced elsewhere it is narrow in parts, bendy and the width does not allow the free passage of two large vehicles at all places.
- 4.8.4 The new spine road within the development will provide a link between the two access points, thereby reducing the status of the southern section of Ringwood Road. The TA states that the spine road does not form part of the application, which I understand to mean that it forms part of the illustrative masterplan which informs the outline application. The traffic distribution set out within the TA relies on an internal link road

and therefore, whereas the design and alignment of the spine road are reserved matters, the principle of an internal road linking the two accesses must be considered an integral component of the means of access. As submitted, it is my understanding that neither the TA [CDA.19] nor the TAA [CDA.958] have assumed that the only access is from Hillbury Road, and have not assessed the capacity of the roundabout in that scenario. I can understand this as it would be very difficult to access the western part of the site without affecting the alignment of Ringwood Road. It is curious though that access to that part of the site is in fact reserved for future determination.

4.9 **Framework Travel Plan**

- 4.9.1 The Framework Travel Plan (FTP) provides at paragraphs 5.3 and 5.4 the mode of travel to work percentages based on the 2011 Census indicating that 87.6% of the Alderholt population currently drive to work as a single occupant with a further 4.4% as a passenger. Similarly paragraphs 5.5 and 5.6 detail the 2011 Census data for travel to work in the area indicating 70.1% currently drive as a single occupant with a further 4.1% as a passenger.
- 4.9.2 The FTP offers target reductions of an overall 10% reduction for both at paragraphs 5.9 and a corresponding 2% increase in passengers. The indication at 5.10 being that this would be applied as a monitoring strategy over the 10 to 15 years from start of construction set out at paragraph 5.10. Paragraph 5.12 indicates that there are no targets for the local centre. There is no indication within the FTP of any “penalties” that would apply if these targets prove not to have been met nor if the lower trip rates in the TA did not prove to be the case. It is hard to see how the offer of a free week of bus travel from Alderholt to the extremities at Cranorne or Ringwood would sustain meaningful target reduction. Similarly, a £50 cycle voucher would not fund cycle purchase.
- 4.9.3 Although there is a bond in the section 106 proposed this is only to cover the Council’s monitoring fees annually as detailed at 7.15. Paragraph 7.12 and 7.13 merely suggests that:
- “Whilst specific remedial measures have not yet been identified within this Framework Travel Plan, such remedial measures would be identified through discussions with the monitoring authority.”*
- 4.9.4 The FTP as such could be argued to “*lack teeth*”. It does not apply any meaningful measures if the internalisation assumptions are not realised, and does not offer to expand, for example, the public transport service beyond the initial 7 years scenario.

5.0 CONCLUSIONS

- 5.1 There are two issues of concern in the context of the National Planning Policy Framework namely:
- i) The genuine ability to use sustainable transport modes to access the site, and facilities, and
 - ii) The achievement of safe and suitable access to the site for all users.
- 5.2 The first issue is the overall accessibility of the site by modes of transport other than the car. In our opinion, as evidenced by the sparsity of local facilities available, the development, if approved, would be none other than a car-based development outside of the settlement boundary. The existing facilities in Alderholt indicated as being accessible on foot by the residents of the proposed development exceed or are at the very limits of the preferred maximum walking distance by the type of facility. Irrespective of this there are very few facilities within Alderholt that will be genuinely accessed on a daily basis. This features as a consistent concern of local residents who have experience of living in the community.
- 5.3 Existing public transport services whilst offering some limited utility would allow for a trip by public transport to Bournemouth to the south or to Salisbury to the north for some employment and shopping opportunities, but would not allow for leisure opportunities in the evening.
- 5.4 The development in the light of the inadequate pedestrian linkages and in terms of the distance to facilities, the quality and the safety of the links, and the poor public transport frequency and timings would be reliant on the private car for access to other than basic facilities.
- 5.5 Consequentially there is considered to be a “severe” impact of the proposal in the context of the NPPF paragraph 114 of the specific impacts identified above, and the impact on pedestrian movements. In my opinion, there is an unacceptable impact of the proposal due to the poor pedestrian linkages and it follows that there is a severe impact of the proposal due to this, and the poor public transport in terms of frequency, and timings of the service leading to a reliance on the private car for access even to basic facilities.
- 5.6 **In my opinion, the proposed development simply and manifestly fails all of the three tests contained within the National Planning Policy Framework at paragraph 114, and in addition paragraphs 115 and 116. I as such respectfully encourage that the Inspector dismisses the appeal at least on the basis of the seventh reason for refusal.**