

GYPSY AND TRAVELLERS SITES – TRANSPORT EVIDENCE BASE

Background & Document Structure

The purpose of this note is to provide a brief explanation of the Transport Site Assessment work that has been carried out as part of the Winchester District Local Plan Part 2 **Gypsy and Travellers** site assessments.

Unlike the housing site assessments done as part of the Winchester District Local Plan Part 2 , which was designed to rate and compare different sites to enable rating and select of preferred allocations, this has been a simple single stage process. The 'single stage' approach has been the development of a simple Transport Evidence base for each site, focusing on existing planning history in relation to transport and access.

The primary reason that a simpler assessment has been undertaken and is appropriate is the scale of the developments under consideration. The largest site under consideration would could hold a maximum of 18 pitches. Even if each pitch generated the same traffic movements as a house (which is unlikely) data suggests that this would only be 126 daily trip movements (63 in and out). This is in comparison to the smallest settlement development allocation of 250 dwellings which would generate 1750 daily trip movements.

The transport assessments undertaken in support of the housing site allocations were also used to provide a site selection or grading process to demonstrate that some sites could be rated higher than others because of their accessibility or sustainability credentials due to their relative proximity to a range of goods, services and facilities located in the nearby supporting settlement. However, due to the very rural nature of most of the Gypsy and Traveller sites, the clear majority of which are not well located in relations to settlements and their facilities, such an appraisal and grading process could not be undertaken.

This note is divided into a number of sections.

1. **Published Guidance**
2. **Site Assessments**
3. **WDLP Gypsy and Travellers – Transport Issues & General Comments**

4. **Conclusion and Site Summaries**

The section on **Published Guidance** summarises the available information relating to the transportation and highways aspects of Traveller and Gipsy sites. Though it is worth noting that the current (limited) guidance on transportation aspects of Gipsy and Traveller sites does appear to be focused on a presumption of accepting the presence of sites. It should be noted that all the sites under consideration are in

existing use as Gypsy and Traveller sites, albeit that some sites are not authorized.

The section on **Site Assessments** briefly explains the nature of the supporting information compiled for each of the sites being assessed. The limited sizes of the sites in question, together with the limited time and resources to carry out the Transportation assessments means only a very brief overview has been conducted with the focus set on whether there would be unresolvable highway issues with either the continued use or expansion of the sites examined. No attempt has been made to provide any sort of ranking system for the sites put forward.

The section on **Transport Issues & General Comments** attempts to cover and respond to a few questions likely to be raised in relation to specific Gypsy and Traveller sites.

1. Published Guidance

The most recent guidance 'Planning policy for traveller sites' published in 2015 makes no mention of transport or access requirements for sites.

The Circular 01/2006 "Planning for Gypsy and Traveller Caravan Sites" includes reference, in a number of paragraphs, to transport / access as follows:

4. *For all kinds of site, consideration must be given to vehicular access from the public highway, as well as provision for parking, turning and servicing on site, and road safety for occupants and visitors*

5.*The site needs to have safe and convenient access to the road network.*

66. *Sites, whether public or private, should be identified having regard to highways considerations. In setting their policies, local planning authorities should have regard to the potential for noise and other disturbance from the movement of vehicles to and from the site, the stationing of vehicles on the site, and on-site business activities. **However, projected vehicle movements for gypsy and traveller sites should be assessed on an individual basis for each site. Proposals should not be rejected if they would only give rise to modest additional daily vehicle movements and/or the impact on minor roads would not be significant***

Whilst no definition of the word 'modest' is given, the implication is that any of the Winchester site (the largest of which with 18 pitches) would most likely always comply within the description of 'modest' and therefore highways objections on the basis of traffic generation, congestion or impact on road safety are unlikely to be sustainable. Unless of course the nature of the access to the site is evidently unsafe or unsuitable.

Appendix B of 'Guidance on Transport Assessments' (2007) published by Department for Transport. This stated that residential units of less than 50 units did not require a TS or TA. Whilst this guidance has been replaced by the publication of 'Transport Evidence Bases in Plan Making & Decision Taking', the replacement document provides no detailed thresholds on where a TS or TA should be undertaken.

The adopted Winchester City Local Plan part 1(CP5) includes reference to safe vehicular access from the public highway and adequate provision for parking, turning and safe manoeuvring of vehicles within the site (taking account of site size and impact).

It is also noted that a number of the rural sites analysed are located on lanes where the available road width would be insufficient to allow two cars to pass. This could give rise to claims that such lanes are unsuitable for additional traffic volumes associated with the use of G&T sites, or from the intensification of existing sites. The analysis of such claims is difficult as there is no official published guidance on the traffic capacity of rural roads.

The most appropriate information available 'The capacity of single-track rural lanes: an initial investigation (Sweet, TRICS, 2012) suggested that there was a consensus of capacity approx. 100-300 vehicles/hr. The guidance relating to the need of 'Transport Statements (TS) or Transport Assessments (TA) in support of residential developments was set down in

2. Site Assessments

Each of the sites put forward as part of the evaluation process has been assessed using the same procedure to ensure a consistent and coherent approach across the District. Each site has a 'Site Assessment – Transport' Sheet. This is a two-sided summary of some of the main transport considerations for each site and a full set of the 38 site assessments is included at Annex A

The focus on the site assessments has been an examination of the previous highway Engineers comments made in relation to each of the sites under consideration, along with, if relevant any planning history and concluding evidence or opinion from appeal decisions and inspections. It is worthy to note that the development or permission for Gypsy and Travellers sites appears to be less onerous in Highway Terms in comparison to residential developments. As a clear majority of the sites under assessment are operating under some form of granted permission (temporary or permanent) the existence of an established 'view' on the acceptability of a site is a significant factor in its ongoing use or further development.

The site assessment sheets also provide information on possible number of G&T units and trip generations. This information was used as a guide only for the likelihood of the need for wider and more comprehensive transportation assessment should the site be taken forward in the planning process. It should not be taken as an actual indication of the number of units a site could accommodate, as other factors relating to the development of the site would affect that consideration. It does also highlight that the sites under consideration are all very small when compared to the traditional housing sites and requirements across the district.

The guidance relating to the need of 'Transport Statements (TS) or Transport Assessments (TA) in support of residential developments was set down in Appendix B of 'Guidance on Transport Assessments' (2007) published by Department for Transport. This stated that residential units of less than 50 units did not require a TS or TA. Whilst this guidance has been replaced by the publication of 'Transport Evidence Bases in Plan Making & Decision Taking', the replacement document provides no detailed thresholds on where a TS or TA should be undertaken

The section on **Vehicle Access Road Details** provides details and comments on a number of details relating to each development site.

Unlike the housing site assessments it has not been possible to carry out an accident assessment of the Gipsy & Traveller sites. In any case the presence of a location or road with a known or apparent accident issue is unlikely to be a reason for a site not to be appropriate for development, but is most likely to warrant investigation and possible action from the site developers in conjunction with the County Council to ensure that accident rates are not detrimentally affected as a result of the development. Furthermore, where appropriate, it is likely that the new development would be expected to contribute or fund for appropriate safety engineering measures.

In terms of the Gipsy and Traveller site allocations the following sites potentially needing further investigation are noted as the collective sites referred to as the Piggeries and the Nurseries

At the bottom of each 'Site Assessment – Transport' sheet is a note providing further explanation and possibly detailed comment on some of the issues for the site

3. WDLP Gypsy and Travellers – Transport Issues & General Comments

This section attempts to cover and respond to a number of questions likely to be raised in relation to specific Gypsy and Traveller sites.

It is important to note that in the early stages of the Local Plan Process it cannot hope to resolve or answer all of the site specific queries in relation to individual sites, but more simply to ensure that there is unlikely to be definitive reasons that would prevent the allocation and subsequent development of identified and selected sites.

Quantum of Development – *Can local roads cope with all the development sites identified?*

The total potential impact of all of the sites under consideration would be a fraction of that considered and evaluated as part of the housing site assessments undertaken through the local plan process. As the quantum of allocated housing development for the settlement/district has been tested through the Local Plan (Part 1) Process and has been subject to examination in public and has been found to be sound, it is concluded that the potential impact of the Gypsy and Traveller sites would also be acceptable when considered across the district.

Road Safety – *What about the impact on road safety / accidents at....?*

The location of an existing or perceived accident risk would not necessarily negate the development of a site, but more likely warrant a financial contribution to the highway authority for the construction or development of a remedial scheme. As none of the sites under consideration is more than 18 residential units the associated additional traffic movements is unlikely to warrant an objection on safety grounds.

Parking – *Will there be enough parking?*

Any development site will need to provide car parking to meet the adopted standards of the city council. These have been developed to ensure that sites can accommodate their own parking demands.

Traffic Management – *There are already parking problems in....?*

Where there are existing minor traffic management issues (inappropriate parking on corners etc) then the city council does have the powers to develop and implement traffic regulation orders to control such issues.

Public Transport – *The public transport provision is poor, more buses are needed!*

Whilst the public transport provision in the rural areas of the district may not match that of urban areas, the limitations or absence of public transport provision is unlikely to be sufficient reason to refuse the allocation of a site for gypsy or travellers.

Provision of Appropriate Access – *How is safe access to be achieved?*

The WDLP is a land use plan, it has been prepared by the planning authority with little assistance from the Highway authority. The Local Plan does not and cannot specify the exact form of access that would be required to serve an allocated

development site. This would be the responsibility of the Highway authority or its representatives at the time of submission of a planning application.

Nor would it be appropriate for the local plan to indicate or dictate the type and location of road or traffic management measures that may be required to offset the impacts of traffic from a development site. It can however refer in general terms as to what provision may be required.

It is also worthy of note that many existing sites which could be viewed as having minor safe access issues have been examined at appeal and often inspectors have overruled such concerns.

Traffic Impact / Road Capacity & Congestion – *The New development will impact....*

Where ever development is located, local roads will inevitably accept some localised increases in traffic, However the predominantly rural nature of Winchester district and the dispersed locations of settlements is such that on the local roads congestion cannot be seen or experienced to the same extent as that in urban areas, and as such is not likely to be a tenable reason to refuse or prevent development.

Furthermore, if congestion genuinely is, or does become a problem then it is often accepted as a positive inducement to encourage users to try more sustainable travel modes or retime their journeys to reduce demands on the highway network.

Access via restricted width lanes – *The access lane is too narrow for two vehicles...*

Many of the sites under consideration are in predominantly rural areas and may be served by rural lanes some of which are single-track. In places where the available road width would be insufficient to allow two cars to pass it could give rise to claims that such lanes are unsuitable for additional traffic volumes associated with the use of G&T sites, or from the intensification of existing sites. The analysis of such claims is difficult as there is no official published guidance on the traffic capacity of rural roads. The most appropriate information available 'The capacity of single-track rural lanes: an initial investigation (Sweet, TRICS, 2012) suggested that there was a consensus of capacity approx. 100-300 vehicles/hr. Therefore, the presence or addition of a small site generating a limited number of trips per hour is unlikely to warrant an objection on highways grounds given the established views and comments from previous appeal decisions and guidance mentioned elsewhere in this document.

4. Conclusion and Site Summaries

The majority of the sites considered are viewed to be acceptable in Highways Safety and Impact terms. That is not to say there are no issues with many of these sites – but there is often an overriding precedent or decision that means it would be difficult to either impose controls on the ongoing use of the site, or to restrict further minor developments for example to allow family group expansion.

The only sites where there are clear and identified issues in highways terms are:

Site No	Site Name	Issue
W004	Joymont Farm	Restricted Visibility onto Curdridge Lane
W009	Greenacres	Restricted Visibility onto Pricketts Hill
W026	Grig Ranch	Restricted Visibility onto Titchfield Lane

Whilst it would be beyond the remit of this work to dictate that these sites would not be suitable for increased / development it highlights that such sites would need further work to demonstrate that development or expansion can be safely accommodated onto the highway network.

In addition two sites have been identified where there are issues – but it is believed that these could be readily improved:

W082	Beacon Haven	Restricted Visibility onto Forest Road
W085	Gravel Hill	Restricted Visibility onto Gravel Hill

Appendices: - Detailed past highways comments on certain sites

Record No 3720 Highway Comments 15 November 2002. The Nurseries

Further to my previous comments on Eng Record No.3514 I have now been forwarded copies of decision notices and appeal decision letters relating to previous planning applications for similar proposals on this site.

W13157 was refused on 01/07/93 but with no highway reasons listed. A subsequent appeal was dismissed and the Inspector commented on highway issues as follows.

"19. The second issue, highway safety, was not a reason for issuing the notice or refusing planning permission but was mentioned by almost all the objectors. A short distance to the west of the site the road has a fairly gentle double bend and it also curves slightly to the east. It is subject to the national 60mph single carriageway speed limit. A survey by the local highway authority had shown the 85 percentile wet weather speed of traffic to be 41mph eastbound and 45mph westbound. For those conditions Planning Policy Guidance Note 13 recommends visibility of at least 160m.

20. Despite the drawing which you submitted (plan K) showing the sightlines obtainable, standing at 4.5m back from the carriageway edge I found visibility in both directions obstructed by the boundary hedge, which would have to be removed or repositioned to permit the visibility you claimed. Even then the hedge of the field to the west would hide from a driver leaving the site an eastbound car overtaking as it emerged from the double bend into the straighter section by the appeal site. When I stood 2.4m back from the carriageway, which the appellants argued was sufficient for this situation, I found that part of the hedge still needed to be removed, and that vegetation on the opposite verge momentarily obstructed my view of a car in the bend.

21. I conclude that even if the parts of the hedge were removed or repositioned, the whole width of the road to the west could not be seen for the recommended distance. However the access served the site's previous use as nursery and "pick your own" enterprise, apparently without giving rise to any reportable accident (although 4 have occurred at or near the Sandy Lane junction during the last 3 years). I was not persuaded that regular "domestic" movements by those living on the site, and less frequent movements of larger vehicles containing equipment and sometimes towing caravans would significantly exceed the private car and commercial traffic associated with the previous uses.

22. While I do not think that the shortcomings in visibility from the access in themselves warrant dismissal of the appeals, removing parts of the present hedge in my opinion would leave the site more visible and obtrusive still, increasing the visual impact of the development which I have judged to be unacceptable before taking that into account." W13157/01 was refused on 30/03/95 and included two highway reasons, relating to the inadequate visibility splays due to insufficient length of frontage to the A334 and to increased use of the access interfering with the safety and convenience of highway users. A subsequent appeal was dismissed but with no specific reference to highway matters. No details of W13157/02 have been forwarded and as such I must assume that it has no relevance. W13157/03 was refused on 17/04/98 for the same reasons as W13157/01 and a subsequent appeal was dismissed. In paragraph 8 of the decision letter the Inspector states: "A criterion of LP Policy C2 is the provision of adequate access. Visibility at the site entrance is not ideal, due to vegetation and the proximity of a bend to the west. In addition, some of the vehicles on the site are large and would be slow moving and difficult to manoeuvre. Improvements to the visibility could be made by removing or resiting the hedge but, in my opinion, this would lead to the site becoming more visible and intrusive, at least in the short term. However, you submit that there have been no accidents resulting from the use of the access during the time the show people have occupied the site. No significant evidence has

been submitted to cause me to differ from the view of the Inspector in 1993 who stated that he was 'not persuaded that regular domestic movements by those living on site, and less frequent movements of larger vehicles containing equipment and sometimes towing caravans would exceed the private car and commercial traffic associated with the previous uses.' I therefore consider that, in themselves, the shortcomings in visibility do not warrant dismissal of this appeal."

W13157/04 was refused on 27/04/2001 but no highway reasons are listed on the decision notice. A subsequent appeal was dismissed but with no references to highway matters. Following a recent discussion with Anna Budge I can confirm that, in view of the above appeal history, it would be difficult to sustain highway objections to this application. However, as suggested by two of the Inspectors, it may be that access and visibility improvements would require works that leave the site even more visible and intrusive and thereby increase the visual impact of the development. M Gilbert 15 November 2002.

Record No 3514 Highway Comments 18 October 2002. The Nurseries

This is an application for full permission for "change of use (full) to showmen's permanent quarters" on land at The Nurseries, Botley Road, Shedfield. The application form states "parking spaces to be accommodated on site as shown on site layout plan", the existing use of land is "showmen's permanent quarters, previous use commercial nursery" and the number of existing dwelling units on site is "7 family units". It also indicates that no building is to be demolished, an existing access is to be altered and no trees or hedges are to be removed.

The submitted unnumbered location plan is an extract from an Ordnance Survey map showing the application site and access outlined in red. An unnumbered site layout plan shows the site divided into five separate plots, which are served by the existing access and a "tarmacadam roadway". The plan shows no sight lines at the access (or works entailed in their provision and retention) and gives no details of proposed improvements to the existing access.

These could be very important issues, as a site inspection has revealed that the existing access is substandard with respect to layout, construction and visibility. As such it is considered to be unsuitable to safely accommodate a material increase in vehicle movements, especially large slow moving HGVs. However, in order to sustain highway objection on these grounds would require proof of demonstrable harm in the form of a material increase in these vehicle movements.

I have been forwarded a summary sheet of planning history for this site, which indicates there have been previous applications for similar development proposals on this site. All of these appear to have been refused, one of which was dismissed at appeal. However, I have been forwarded no details of these previous applications (or appeal) and consequently I am unable to make comparisons with the current proposal and I have no idea if the previous refusals included highway reasons. In fact I have no record of this office being consulted on the previous applications.

Planning history is obviously very important when giving consideration to whether highway objections can be sustained at appeal and, as such, I am unable to comment further at this stage without more details on the previous applications.

Durley Street - Durley Site W087 Highway Comments 16/03090/FUL

There is previous planning history on this site and I responded to an earlier application (09/02617/FUL - W21706) see engineering record no. 13584 dated 08/11/11 when the principle of the proposed development was accepted regarding highway issues. These previous comments are reproduced below:- Ian Elvin 16/01/17

09/02617/FUL - W21706 The planning case officer wishes to take this application to Committee and has asked me to make further comments. I understand that the option of a relocated access is no longer viable due to the environmental impact it would cause. Therefore, the highway response must consider the impact to highway safety of the proposed development using the existing vehicular access. As explained in my previous response my colleague at Hampshire County Council does not support the setting of visibility splays that meet observed vehicle speeds where those speeds are clearly in violation of the established speed limit, which merely encourages higher speeds - a point made clear in the evidence underpinning Manual for Streets (MfS).

Manual for Streets 2 - MfS2 (published in September 2010) builds on the Guidance of MfS "exploring in greater detail how and where its key principles can be applied to busier streets and non-trunk roads". Table 1.1 f MfS explains that key areas of advice can be applied based on speed limits on roads subject to 20mph, 30mph, 40mph, 50+ mph. In this table advice contained in MfS2 regarding Stopping Sight Distances should be applied to all roads subject to 30mph and can be even applied to roads of 40mph and 50+mph subject to local context.

Since making my previous Engineering response (dated 17/11/10 - engineering record no. 12631) I have received The Planning Inspectorate's Appeal decision (dated 15th March 2011) regarding a similar planning application for a residential gypsy site for three mobile homes at site know an Copperfields, Pestead Lane, Soberton where the effect of the proposal on highway safety was one of the main issues. In brief the Inspector's conclusion was that although the visibility splay was significantly less than those required by MfS the proposal would result in only a modest increase in the use of a substandard access.

The existing vehicular access at Berkley Farm emerges onto Durley Street, which is subject to a 30 mph speed limit and the advice contained in MfS is that visibility splays of 2.4m (which may be reduced to 2.0m) by 43m in each direction are required on streets subject to a speed limit of 30mph.

On site measurements have identified that a visibility splay looking south (to the right - normally regarded as the more critical direction) of 2.0m by 120m is obtainable subject to the trimming back/or removal of vegetation that appears to be overgrowing the public highway area. Visibility splays looking north (to the left) of 2.0m by 57m to the nearside channel and 2.0m by 76m to the centreline of the carriageway is obtainable. Therefore, visibility splays can be provided in accordance with the Guidance advice for streets subject to a 30 mph speed limit.

Mindful of the advice contained in the Manual for Streets series of documents, together with the advice obtained from my colleagues at Hampshire County Council and the subsequent Cooperfields Appeal decision, it is unlikely that the modest increase in traffic resulting from the proposed application will cause sufficient demonstrable harm to successfully sustain a highway reason for refusal at appeal. For the above reasons, I wish to withdraw my previous recommendation of refusal and request that the following conditions are applied to any consent issued:-

H120 – Visibility splays. Before the development hereby approved is first brought into use, visibility splays of 2.0 metres by 43 metres shall be provided at the junction of the access and public highway. The splays shall be kept free of obstacles at all times. Reason: In the interests of highway safety.