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Transport Technical Note

Palmers Farm, Brocks Copse Road, Wootton, Isle of Wight, PO33 4NP

Objection to planning application 22/0654/FUL

Prepared for WAGE

By YES Engineering Group Limited

19/10/2022

Revision History

Revision Nº	Prepared By	Description	Date

Document Acceptance

Action	Name	Signed	Date
Prepared by	K Backhouse		October 2022
Reviewed by	P Willis		October 2022
Approved by	K Backhouse		October 2022
on behalf of	YES Engineering Group Ltd		

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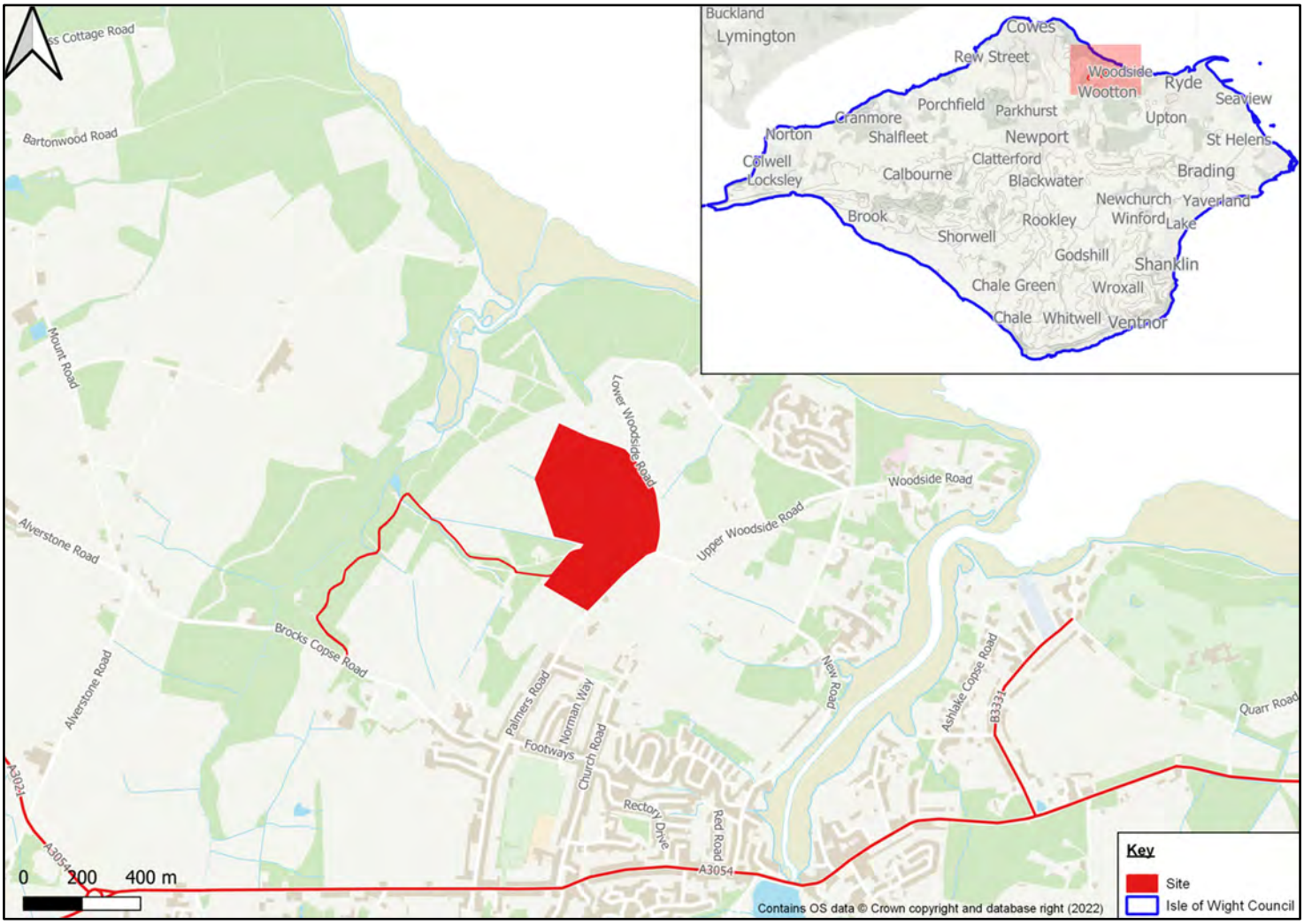
1 Introduction

YES Engineering Group Ltd has been instructed by Wootton Whippingham and Arreton Against Gravel Extraction (WAGE) to prepare a Transport Technical Note (TN) to set out the transport related objections to the planning application for gravel extraction at Palmers Farm, Brocks Copse Road, Wootton, Isle of Wight, PO33 4NP (planning application reference number 22/0654/FUL).

It will be demonstrated that WAGE have valid reasons for concern with respect to the traffic impact associated with the application as set out in this TN.

As shown at **Figure 1.1**, it can be seen that the site is situated on the northern side of Brocks Copse Road and to the west of Palmers Road and Lower Woodside Road.

Figure 1.1 – Location Plan



The site lies within the administrative area of the Isle of Wight Council (IWC), which is a Unitary Authority.

1.1 Development Proposals

The proposed development is for extraction of approximately 900,000 tonnes of sand and gravel over a 10-year period on land at Palmers Farm, Wootton with restoration back to agriculture with biodiversity enhancements (planning application reference number 22/0654/FUL).

Access

It is proposed that a new vehicular access is constructed on the northern side of Brocks Copse Road between the property 'Into the Woods' and Palmer's Brook. A Draft Traffic Management Plan is attached as Appendix 7 of the Transport Assessment submitted with the application which sets out the following.

1. All vehicles using the site will be under Wight Building Materials control. Only 3 or 4 axle lorries will be used to transport as dug aggregates.
2. All vehicles will follow the prescribed route of Brocks Copse Road, Alverstone Road, the A3021, the A3054, Station Road, Wootton, Briddlesford Road, Downend Road, the A3056.
3. No vehicle will use Palmers Road.
4. Vehicle routing will be monitored by CCTV at the site entrance and GPS systems fitted to lorries.
5. HGV movements will be 0800 to 1600 hours.
6. There will be a maximum of 50 HGV movements per day.
7. HGV arrival and departure times will be managed by CCTV at the Palmer's Farm site and in-cab communication to ensure that HGVs entering and leaving the site do not meet each other on Brocks Copse Road and Alverstone Road.
8. Wight Building Materials will fund the preparation of a Traffic Regulation Order to reduce the speed limit on Brocks Copse Road to 30mph.†
9. A new access point will be provided on Brocks Copse Road as shown on drawing A.119/8. The recently approved access at Palmers Farm permitted under planning consent 21/00850/FUL will not be used for the life of the mineral permission.
10. Existing informal passing areas on Brocks Copse Road will be improved to assist traffic passing HGVs.
11. Junction priorities at the Brocks Copse Road/Alverstone Road junction will be amended to give priority to traffic coming from Alverstone Road as drawing A.119/5.
12. Existing informal passing areas on Alverstone Road will be improved to assist traffic passing HGVs.

Drawings for the access onto Brocks Copse Road (item 9) and the junction improvement of Brocks Copse Road/Alverstone Road junction (item 11) are attached as Appendix 8 of the Transport Assessment but there are no drawings showing the improvements required for the passing places on Brocks Copse Road (item 10) or for Alverstone Road (item 12).

†It should be noted that although Wight Building Materials state they will fund a Traffic Regulation Order (TRO) to reduce the speed limit to 30mph. The TRO would need to be processed by Island Roads as highway authority who are the only body who have the power#s to instigate this under the Highways Act. Furthermore, there is no guarantee that the reduced speed limit will be implemented as the speed survey undertaken shows the speed of traffic is around 37mph in the vicinity of the site access. The police are likely to object to a 30mph limit imposed as there would be an enforcement issue going forward.

Access to the site for the development is considered in **Section 4** of this TN.

1.2 Hampshire County Council Consultation Response

As Island Roads (the Isle of Wight Highway Authority) cannot respond to the planning application, Hampshire County Council (HCC) was consulted to provide highway authority advice. HCC issued a letter to the Isle of Wight Council on 7th June 2022, which highlighted several concerns that need to be addressed. The following additional information of the applicant was requested:

- Geometry and gradient details of the access
- A Stage 1 Road Safety Audit of the access
- Vehicle tracking of the access and passing places on the proposed route
- Forward visibility to be shown for several bends on Brocks Copse Road and Alverstone Road
- Bridge weight restriction on Brocks Copse Road to be checked

- Highway Condition Surveys for Brocks Copse Road and Alverstone Road
- Change of junction priority signs to be shown on the drawing for Dallimores Junction, and vegetation to be cut back so it does not impede the visibility
- Additional workers information needed and associated trips
- Detailed site layout plan which demonstrates contractors parking and wheel washing facilities
- Alternative access options should be explored should visibility and passing place provision not be addressed.

It is clear that HCC cannot provide a positive response to the planning application unless the above issues can be satisfactorily be addressed.

A large number of the above points are considered in this TN.

1.3 Scope of the Technical Note

Following this introduction, the report is structured as follows:

Section 2.0, Planning Policy: Sets out transportation planning policy relating to the mineral development.

Section 3.0: Baseline Conditions: Describes the existing road network of Brocks Copse Road and Alverstone Road (south), walking and cycling infrastructure, and other features pertinent to the development.

Section 4.0, Traffic Impact: Considers the number and size of vehicles to be generated by the development, vehicle access, proposed changes to the public highway, and lorry routing arrangements for the proposed development against current standards. This section also considers the alternative accesses.

Section 5.0, Summary and Conclusions: Provides a summary of the report and draws together its conclusions demonstrating the validity of the objections.

2 Planning Policy

2.1 National Policy

National Planning Policy Framework (2021)

The National Planning Policy Framework (NPPF) sets out the Government's economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.

Section 9 – Promoting Sustainable Transport is relevant and is reproduced below.

104. 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.

105. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

106. Planning policies should:

a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;

b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;

c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;

d) provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);

e) provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements; and

f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time–taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government's General Aviation Strategy.

107. If setting local parking standards for residential and non-residential development, policies should take into account:

a) the accessibility of the development;

b) the type, mix and use of development;

c) the availability of and opportunities for public transport;

d) local car ownership levels; and

e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

108. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework).In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.

109. Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.

Considering development proposals

110. 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) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and

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.

111. 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.

112. Within this context, applications for development should:

a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

113. All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

2.2 Isle of Wight POLICY

The Island Plan - Isle of Wight Core Strategy (2012)

The Island Plan – Isle of Wight Core Strategy (Including Waste & Minerals) was adopted in March 2012. The following policies are directly relevant to the planning application.

Policy SP9 – Minerals

All mineral proposals will need to demonstrate proper consideration of the relevant associated social, environmental and economic effects and, where these are negative, seek in the first instance to avoid, then mitigate and finally compensate these effects. The local context of potential mineral supply is likely to create exceptional circumstances that require a flexible approach to be taken towards the AONB and groundwater protection, where these would normally be excluded, in order to provide a realistic range of mineral sites. In such exceptional circumstances, mineral development will be allowed where it can be demonstrated to meet the requirements of this policy to the Council's satisfaction. Any permission granted for mineral development that is assessed as likely to have a significant negative effect will require mitigation, where relevant compensation and (where permission is temporary) restoration plans, that will be carried out to high environmental standards and be specific to the local interest features that are likely to be impacted upon.

Primary Aggregates

The Council will provide for 0.1 million tonnes per annum of land-won sand and gravel, with due regard to geological, environmental and market considerations, and maintain a landbank of at least seven years of planning permissions for land-won sand and gravel, sufficient to deliver the Island's identified need. To ensure that this is delivered, the Council will:

1. Safeguard existing mineral sites and when the landbank falls below this indicator threshold, new permissions will be considered positively by the Council where they support the policy approach to minerals in this plan.

2. Take a sequential approach to both the identification of allocations and when determining planning applications, which only considers protected areas when there are strong overriding sustainability reasons and geological conditions and negative impacts can be properly mitigated.

3. Allocate the following sites, which are shown on the Proposals Map:

MA1: Crockers Farm

MA2: Lavender Farm

MA3: Cheverton Farm

MA4: Blackwater Quarry (western extension)

MA5: Cheverton Gravel Pit

MA6: Blackwater Quarry

Mineral Safeguarding Areas (MSAs)

Mineral Safeguarding Areas (MSAs) are identified on the Proposals Map to protect the following mineral related assets from unnecessary sterilisation by development:

- Proven deposits of Island minerals which are, or may become, of economic importance within the foreseeable future.
- Mineral sites and infrastructure including wharves that are necessary to the processing and transport of minerals.

Recycled and Secondary Aggregates

The Council will work towards achieving a target 0.1 million tonnes per annum of recycled and secondary aggregates by 2016 through:

a. Safeguarding sites that already have permission to carry out activities associated with the supply of recycled and secondary material; and

b. Supporting, in principle, proposals that contribute to achieving the recycled and secondary aggregates target.

Aggregate Wharves

Aggregate Wharves, as shown on the Proposals Map, are of strategic importance in terms of the transportation of minerals and other goods and are therefore safeguarded. The Council will support appropriate improvement, modernisation and extension of aggregate wharves that are in accordance with the relevant policies of this Plan. Proposals for new wharf facilities should consider the relevant areas against which all mineral applications will be considered as detailed in policy DM20.

Planning for uncertainty in mineral demand

Where a specific development project, such as the Highways PFI, generates a significant demand that is in addition to those accounted for in the provision of the Council's mineral landbank, the use of borrow pits will be considered to help fulfil such an unanticipated demand. Where such a proposal is made, it will be expected to comply with the requirements of both this policy and DM20 and any other relevant policies within the Core Strategy.

Palmers Farm is identified as an MSA in the Island Plan and therefore needs to be considered against Policy SP9 accordingly.

Policy DM20 – Minerals

Mineral related development proposals (including wharves, quarries, borrow pits and associated processing plants) will be expected to demonstrate how they will:

1. Contribute to overall levels of provision for primary land won aggregates, imported and marine dredged and secondary and recycled materials over the Plan period (as set out in SP9) and for land won aggregates, how they contribute to the maintenance of the Island's landbank (of at least 7 years) of sand and gravel.

2. Apply a hierarchy of resource efficiency (including reducing demand and use of virgin aggregate and use of secondary and recycled aggregate and other suitable alternatives before use of virgin aggregate) and demonstrate this.

3. Apply a sequential approach including consideration of both existing mineral sites and allocations.
4. In the first instance avoid the principal environmental and nature conservation impacts associated with mineral development and where necessary mitigate these impacts, including noise, dust, air quality, vibration, mineral waste, visual, impact on archaeological and heritage features, ground and surface water and land stability.

5. Minimise the adverse impacts of the transport of minerals and associated construction materials, including traffic and access.

6. Maximise the beneficial after-use of the site through Restoration Plans and where appropriate, the provision of a Restoration Bond.

7. Demonstrate appropriate remediation that enhances the landscape, biodiversity and geodiversity and, where possible contributes to the Island's Green Infrastructure network.

In conjunction with mineral extraction, the Council will, wherever possible, promote mineral use minimisation and opportunities to re-use associated waste products, together with the promotion of the use of recycled aggregate and/or demolition waste as set out in DM1. Planning permission will not be granted for any form of development within a Mineral Safeguarding Area that is incompatible with safeguarding the mineral unless:

a. the applicant can demonstrate to the satisfaction of the Council that the mineral concerned is no longer of any value or potential value; or

b. the mineral can be extracted satisfactorily prior to the incompatible development taking place; or

c. the incompatible development is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or

d. there is an overriding need for the incompatible development.

It will be demonstrated in Section 4 of this TN that the planning application is contrary to Policy DM20.

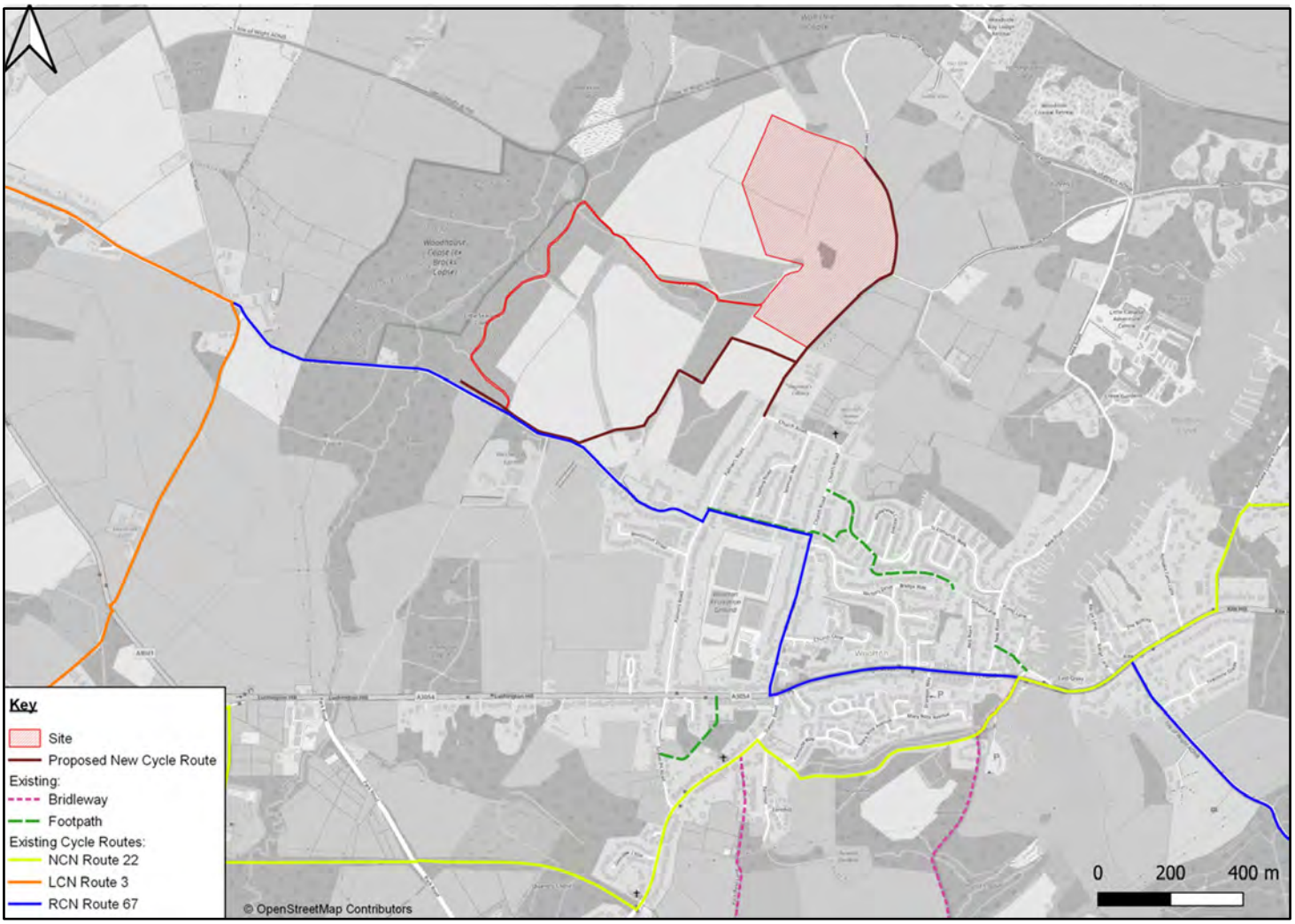
3 Baseline Conditions

3.1 Cycle Infrastructure

Palmers Farm is located directly to the north of the Round the Island Cycle Route (Route 67) which passes along Brocks Copse Road as shown in blue on **Figure 3.1**. Local Cycle Route 3 is along Alverstone Road as shown in orange. Both cycle routes will be directly affected by the development as they form part of the Draft Traffic Management Plan discussed at **Section 1.1** above.

The proposed new cycle route offered as part of the development is marked in brown on **Figure 3.1** where it can be seen that very little of this new infrastructure will alleviate the impact the gravel lorries will have on cyclists using Brocks Copse Road and Alverstone Road. This is discussed in **Section 4** of this TN.

Figure 3.1 – Existing and Proposed Cycle Infrastructure



As shown overleaf there are photographs of cyclists using Alverstone Road, part of the lorry route from Palmers Farm. It can be seen that a 1.5m clearance for passing cyclists is not possible (Rule 163 of the Highway Code).

3.2 Highway Network

Brocks Copse Road

Brocks Copse Road has a 60mph speed limit and is governed by a 6'6" (2m) width restriction with direct access only permitted from its eastern end. It is also signed as part of the Round the Island Cycle Route (Route 67). In addition, as stated in Island Road's pre-application advice (Appendix 4 of the Transport Assessment), *"the presence of this restriction alone highlights the unsuitable nature of this part of the highway network to carry HGV movements which would be increased as a result of your proposal. At this stage I fail to see how Brocks Copse Road and Alverstone Road can be justified as being suitable and safe routes to accommodate additional daily HGV traffic movements without putting other highway users at risk of conflict."*

Island Roads also says in their pre-application advice, *"due to the limited means of access into and out of East Cowes this route is also used as a diversion should any road traffic incidents block the passage of traffic on Whippingham Road south of its junction with Brocks Copse Road."*

Brocks Copse Lane reduces in width to 3m between the new access to be provided and the junction with Alverstone Road. It can also be seen in the photograph below of Brocks Copse Road that there are no footways, and the verges are not suitable for pedestrians, so they have to use the carriageway.

It should also be noted that the Committee Report for the consented 40 residential unit development at Palmers Farm (planning application number P/00741/18) included the following highway comments at paragraph 650, *"When originally submitted, the planning application showed that the site would include two vehicle/ pedestrian accesses. The northern section of the site was shown to be accessed via Palmers Road, with the western housing via Brocks Copse Road. However, Officers and Island Roads raised concerns in relation to the safety of the Brocks Copse Road access and as a result, revised plans have been provided showing that the whole development would be accessed via Palmers Road."*

The Transport Statement submitted with the application was anticipating 25 cars (50 two-way movements) along Brocks Copse Lane for the residential development, which is a lower traffic flow with smaller vehicles than the gravel extraction application. It is therefore reasonable to suggest that Officers and Island Roads would have severe reservations in highway safety terms with respect to the gravel extraction application.

Alverstone Road

Alverstone Road (southern section between Brocks Copse Road and Whippingham Road) is also rural in nature and subject to a 60mph speed limit. Immediately to the north-east of Alverstone Farm the carriageway narrows to just 3m in width and then further to the north-east varies in width of between 3.6m to 3.7m to the brow of the hill where it widens to 4.3m in width where there is a bend. The photograph below shows that a driver on this section of road will not be able to see an approaching driver in this narrow section of the road.

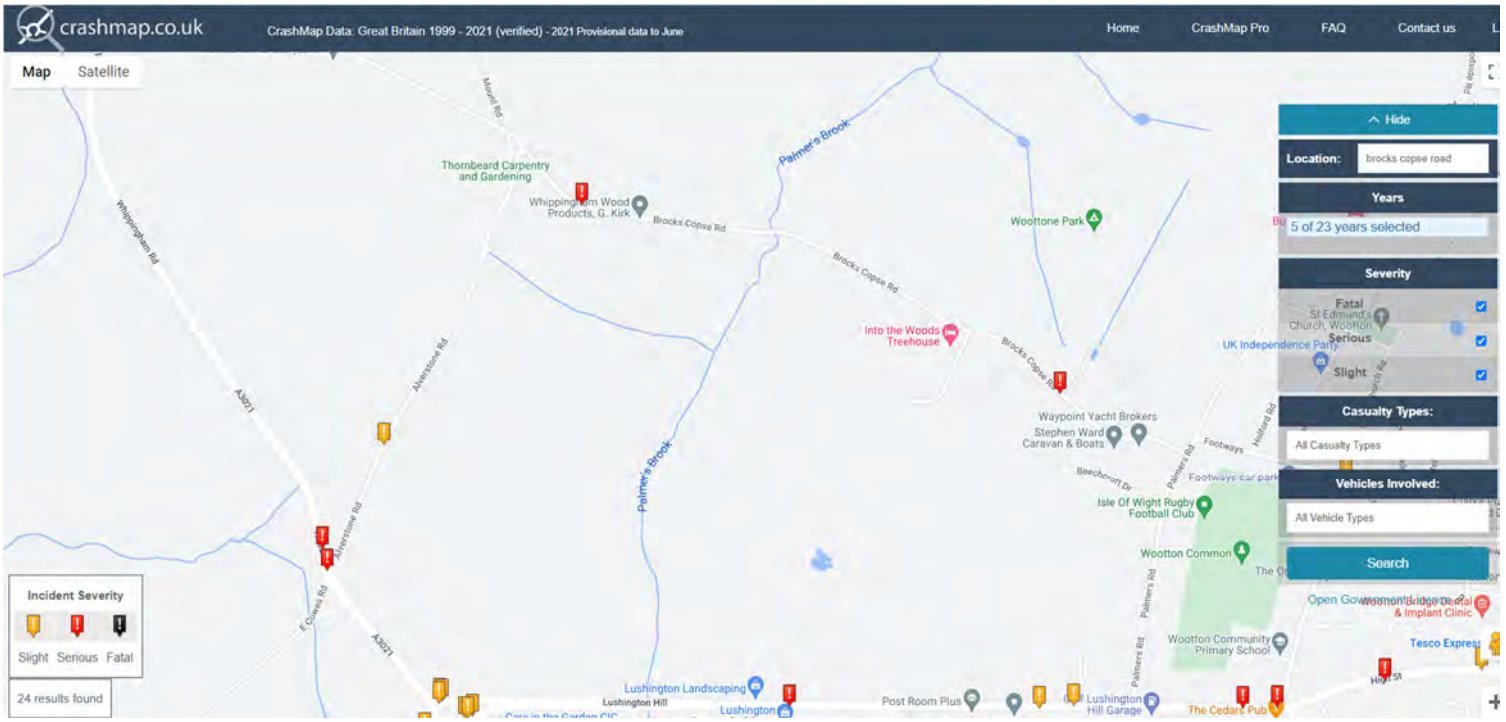
Alverstone Road is similar to Brocks Copse Road as there are no footways, and the verges are not suitable for pedestrians, so they have to use the carriageway.

The visibility for drivers turning right from Alverstone Road to Brocks Copse Road is extremely restricted as shown in the photographs below.

The proposed changes to the junction that have been put forward for the application are discussed in **Section 4** of this TN.

3.3 Road Safety

The CrashMap website was interrogated to establish the accident record on Brocks Copse Road and Alverstone Road over the last 5-years. It can be seen from the screenshot below that there have been 2 accidents on Brocks Copse Road, 1 accident on Alverstone Road, and 2 accidents at the Alverstone Road junction with Whippingham Road that all but one resulted in serious injury.



It is notable that all of the three accidents on Brocks Copse Road and Alverstone Road involved two cars trying to pass or following another vehicle on particularly narrow sections of the roads. The introduction of additional traffic on these narrow carriageways is likely to compromise further the level of road safety.

The two accidents at the junction of Alverstone Road and Whippingham Road involved just one car and one motorcycle. The car driver lost control of the vehicle on the bend, left the road and hit a tree. The rider of the motorcycle sustained serious injury when attempting to turn right.

4 Traffic Impact

4.1 Traffic Generated by the Development

The Transport Assessment submitted with the planning application sets out the traffic movements associated with Palmers Farm 900,000 tonnes of gravel and sand extraction over 10-years. The number of lorry movements per day to take the gravel from site appears to be reasonable. However, the number of traffic movements for the overall scheme have been significantly underestimated as no account has been made of the traffic movements for the following associated activities:

- The construction of the vehicle access to Brocks Copse Road and haul road within the site;
- The plant needed to be brought on-site for the gravel extraction;
- The creation of the site compound, including welfare facilities, offices, etc;
- Security fencing, CCTV, lighting, and other safety measures to be installed at the site;
- Landfill needed to be brought on site to fill in the voids in the ground left following extraction;
- The construction of the new cycle path across the site;
- The materials needed for restoration (pond liners, etc); and
- Staff travel.

The Draft Traffic Management Plan (Appendix 7 of the Transport Assessment) states that all vehicles using the site will be under Wight Building Materials control. The additional activities listed above that are associated with the gravel extraction are unlikely to involve vehicles that are all under the control of Wight Building Materials.

It is clear that a much greater number of traffic movements than that stated in the Transport Assessment will be generated by the gravel extraction activity as no account has been made of traffic associated with the infrastructure required to commence gravel extraction, the staff movements, and landfill required. The increased movements would have a further detrimental impact on the highway network.

4.2 Proposed Access to Brocks Copse Road

It is proposed that a vehicular access is to be created to the northern side of Brocks Copse Road between ‘In the Woods’ and Palmer’s Brook. Paragraph 5.2 states that 20 tonne load 4-axle lorries will transport the gravel from the site to St George’s Down for processing. A diagram of the dimensions of a typical 20 tonne 4-axle tipper is set out below.

Large Tipper	
Overall Length	10.201m
Overall Width	2.495m
Overall Body Height	2.890m
Min Body Ground Clearance	0.341m
Track Width	2.471m
Lock to lock time	6.00s
Kerb to Kerb Turning Radius	11.550m

Figure 4.1 appended to the rear of this document shows the swept path of such a vehicle using the proposed new vehicular access onto Brocks Copse Road. This demonstrates that Brocks Copse Lane is extremely narrow at the location of the proposed new access, and needs to be widened to allow a car to turn in whilst a lorry driver is waiting and the carriageway would need to be widened in the vicinity of the ancient woodland to allow a lorry and another vehicle to pass.

In addition, the visibility splays of 2.4m by 59m required for the actual speed of traffic on Brocks Copse Road (37mph) demonstrate that a large section of hedgerow will need to be removed to provide a safe access.

The proposed access is contrary to Policies SP9 and DM10 of the Local Plan as safe access is not provided.

4.3 Proposed Junction Realignment at Brocks Copse Road/Alverstone Road

It is proposed that the Brocks Copse Road/Alverstone Road junction is realigned in order to change the priority of the route to Alverstone Road (south) to Brocks Copse Road instead of Alverstone Road (north) to Brocks Copse Road. Although this will remove the existing restricted visibility for drivers turning right from Alverstone Road (south) to Brocks Copse Road, there would be the introduction of confusion of drivers travelling westbound from Brocks Copse Road to Alverstone Road (north) as they would be crossing the path of right turning vehicles directly in front of them as there is no clear demarcation that they need to stop. A Stage 1 Road Safety Audit should be provided to demonstrate this alternative configuration of the junction is safe.

Figure 4.2 at the rear of this document shows the swept path of a 20 tonne 4-axle tipper lorry turning at the newly configured Brocks Copse Road/Alverstone Road junction. This demonstrates that extra land at each of the sides of the junction and the central island would need to be paved to allow two-way movement for safety reasons. However, the land referred to as a verge on the northern side of Brocks Copse Road/Alverstone Road contains trees and hedges to the road edge as shown in the photograph overleaf, so it is not clear that this area of land could readily be paved, and it is unclear if the area is public highway or privately owned.

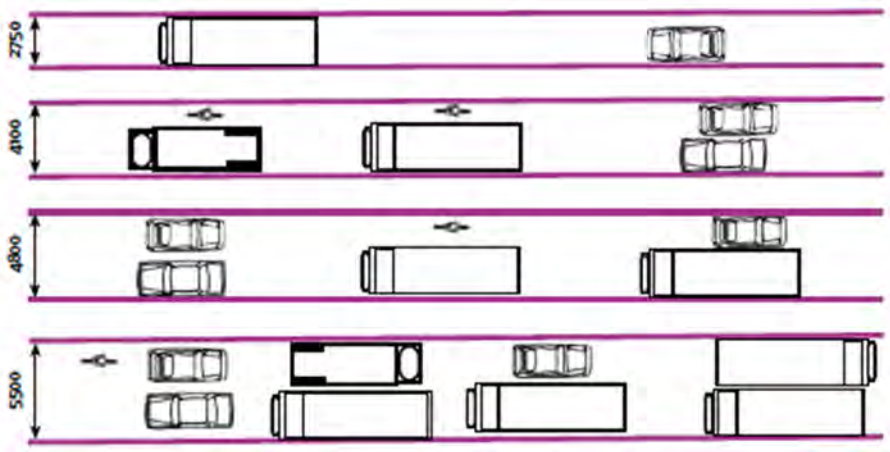
To the south of the junction Alverstone Road is only sufficiently wide to accommodate one vehicle so a car driver or cyclist would be heading straight into the path of an oncoming vehicle as shown in the extract of Figure 4.2 below. The road narrows to 4.2m in this location.

It is clear that the realignment of the junction would still not be sufficient to accommodate the lorries required to transport gravel from Palmers Farm.

The proposed access is contrary to Policies SP9 and DM10 of the Local Plan as safe access along the designated route is not provided.

4.4 Adequacy of the Highway Network for Development Traffic

The National document Manual for Streets sets out at its Figure 7.1 a diagram showing what road widths can accommodate and this is reproduced below.



This demonstrates that a road width of 4.8m is needed to allow a lorry to pass a car or cyclist. The Transport Assessment Appendix 6, carriageway survey, shows that the vast majority of Brocks Copse Road and Alverstone Road is less than 4.8m in width.

In addition to the above, there are also sections of road that do not allow sufficient forward visibility (which should be 59m to allow for the recorded speed of traffic) to enable a driver to see an approaching vehicle or cyclist. The locations where forward visibility is substandard where passing places cannot be provided is shown on **Figure 4.3** attached at the rear of this document.

It is clear that the roadworks that are needed to facilitate safe access of the 20 tonne lorries to and from Palmers Farm along the route specified cannot be achieved and would have a significant detrimental impact on the rural nature of the area.

The proposed access is contrary to Policies SP9 and DM10 of the Local Plan as safe access along the designated route is not provided.

4.5 Alternative Accesses

HCC recommended that alternative access to and from Palmers Farm is investigated. Alternative routes include the following:

- Brocks Copse Road (eastern end from existing access to Palmers Road)
- Palmers Road
- Footways
- Church Road (between Palmers Road and High Street)

Each of the above routes are considered in turn where it can be seen there is no viable alternative access.

<u>Brocks Copse Road</u>

Brocks Copse Road (eastern end) has a 6'6" (2m) width restriction as shown in the photograph below and is subject to a 30mph speed limit. This road is residential in nature, has no footways and is part of the Round the Island cycle route and the coastal footpath. The applicant has proposed a new cycle

path (shown in **Figure 3.1**) within the Palmers Farm site to avoid cyclists needing to use the eastern end of Brocks Copse Road but the gravel lorries would have to cross this to access the excavation site.

It is clear that Brocks Copse Road (eastern section) is not a suitable alternative.

Palmers Road

Palmers Road is a residential road, which links with Palmers Farm proposed gravel excavation site to the main highway network of Lushington Hill / High Street (A3054). Although this route is wider, there is a footway on one side of the road, and subject to a 30-mph speed limit it is still not appropriate. The carriageway is approximately 5.5m in width between Church Road and Lushington Hill / High Street (A3054) but on-street parking occurs on one side of the carriageway between 10 Palmers Road and the junction with A3054 reducing the available road width to around 3.5m so two vehicles are not able to pass the parked cars as shown in the photograph below.

The section of road between Church Road and Brocks Copse Road is the Round the Island Cycle route and the coastal footpath (signs at the Palmers Road junction with Brocks Copse Road shown in photograph).

To the north of Church Road, Palmers Road is a private unsurfaced access road, which is approximately 4.2m in width with very few opportunities for a lorry and car to pass and restricted forward visibility (as shown in photograph below). This route is proposed to be a cycle route by the applicant. This narrow private section of road is used by walkers on the coastal path to Woodside Coastal Retreat and bistro.

Palmers Road is an unsuitable route for gravel lorries.

Footways

Footways is a residential road linking Palmers Road with Church Road, is only wide enough for two cars to pass (c.4.5m in width) and provides access to Wootton Common, 1st Wootton Scout Group, and the Isle of Wight Rugby Football Club. The Round the Island Cycle Route passes along Footways.

It is clearly not suitable for lorries to be routed along Footways.

Church Road

Church Road is a narrow, private and unsurfaced road between Palmers Road and St Edmund's Church. The remainder of Church Road leads to High Street (A3054) at the southern end. This section of Church Road is 5.5m in width with a footway on the eastern side only. On-street parking occurs on one side of the carriageway reducing the available road width to around 3.5m so two vehicles are not able to pass.

The Round the Island Cycle Route is along the southern section of Church Road between Footways and High Street. Furthermore, Wootton Community Primary School is located towards the southern end of Church Road.

It can be seen that Church Road is an unsuitable route for gravel lorries.

5 Summary and Conclusions

a YES Engineering Group Ltd has been instructed by Wootton Whippingham and Arreton Against Gravel Extraction (WAGE) to prepare a Transport Technical Note (TN) to set out the transport related objections to the planning application for gravel extraction at Palmers Farm, Brocks Copse Road, Wootton, Isle of Wight, PO33 4NP.

b The proposed development is for extraction of approximately 900,000 tonnes of sand and gravel over a 10-year period on land at Palmers Farm, Wootton with restoration back to agriculture with biodiversity enhancements (planning application reference number 22/0654/FUL).

c Hampshire County Council (HCC) was consulted on the planning application as Island Roads as highway authority cannot comment. HCC raise numerous concerns with the application with respect to suitability of access to Palmers Farm.

d It is notable that all of the three accidents on Brocks Copse Road and Alverstone Road involved two cars trying to pass or following another vehicle on particularly narrow sections of the roads. The introduction of additional traffic on these narrow carriageways is likely to compromise further the level of road safety.

e It is clear that a much greater number of traffic movements that that stated in the Transport Assessment will be generated by the gravel extraction activity as no account has been made of traffic associated with the infrastructure required to commence gravel extraction, the staff movements, and landfill required. The increased movements would have a further detrimental impact on the highway network.

f The swept path of the gravel lorry to use the proposed new vehicular access onto Brocks Copse Road demonstrates that Brocks Copse Lane is extremely narrow at the location of the proposed new access, and needs to be widened to allow a car to turn in whilst a lorry driver is waiting and the carriageway would need to be widened in the vicinity of the ancient woodland to allow a lorry and another vehicle to pass. The visibility splays of 2.4m by 59m required for the actual speed of traffic on Brocks Copse Road demonstrate that a large section of hedgerow will need to be removed to provide a safe access. The proposed access is therefore contrary to Policies SP9 and DM10 of the Local Plan as safe access is not provided.

g It is proposed that the Brocks Copse Road/Alverstone Road junction is realigned in order to change the priority of the route to Alverstone Road (south) to Brocks Copse Road instead of Alverstone Road (north) to Brocks Copse Road. Although this will remove the existing restricted visibility for drivers turning right from Alverstone Road (south) to Brocks Copse Road, there would be the introduction of confusion of drivers travelling westbound from Brocks Copse Road to Alverstone Road (north) as they would be crossing the path of right turning vehicles directly in front of them as there is no clear demarcation that they need to stop. A Stage 1 Road Safety Audit should be provided to demonstrate this alternative configuration of the junction is safe.

h The swept path of a 20 tonne gravel lorry turning at the newly configured Brocks Copse Road/Alverstone Road junction. This demonstrates that extra land at each of the sides of the junction and the central island would need to be paved to allow two-way movement for safety reasons. However, the land referred to as a verge on the northern side of Brocks Copse Road/Alverstone Road contains trees and hedges to the road edge as shown in the photograph on page 12, so it is not clear that this area of land could readily be paved, and it is unclear if the area is public highway or privately owned. To the south of the junction Alverstone Road is only sufficiently wide to accommodate one vehicle so a car driver or cyclist would be heading straight into the path of an oncoming vehicle. The proposed access route is therefore contrary to Policies SP9 and DM10 of the Local Plan as safe access is not provided.

i A road width of 4.8m is needed to allow a lorry to pass a car or cyclist. The Transport Assessment Appendix 6, carriageway survey, shows that the vast majority of Brocks Copse Road and Alverstone Road is less than 4.8m in width.

j In addition to the above, there are also sections of road that do not allow sufficient forward visibility (which should be 59m to allow for the recorded speed of traffic) to enable a driver to see an approaching vehicle or cyclist. The locations where forward visibility are substandard where passing places cannot be provided.

k It is clear that the roadworks that are needed to facilitate safe access of the 20 tonne lorries to and from Palmers Farm along the route specified cannot be achieved and would have a detrimental impact on the rural nature of the area. The proposed access route is therefore contrary to Policies SP9 and DM10 of the Local Plan as safe access is not provided.

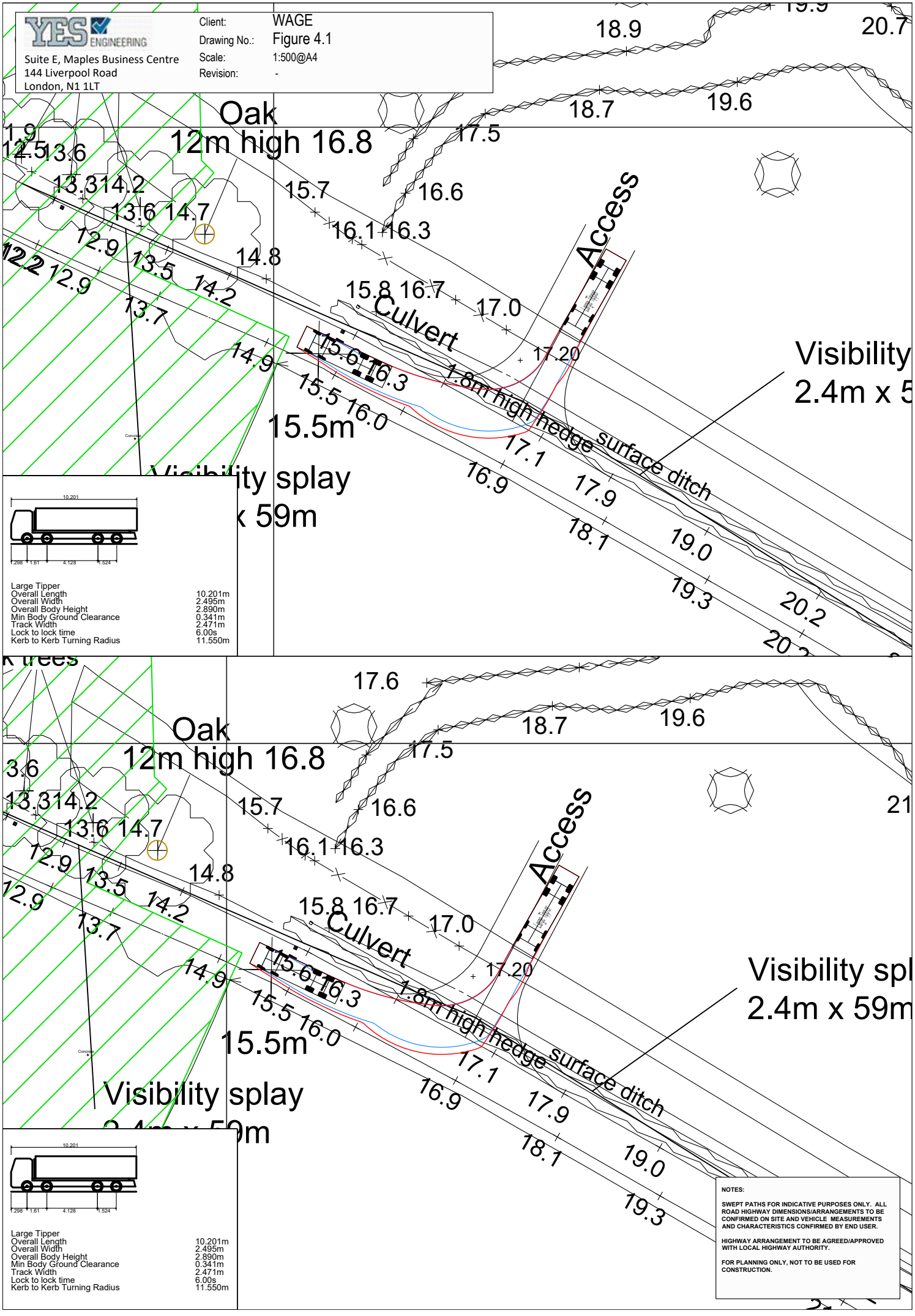
l Alternative routes between Palmers Farm and the A3054 have been examined and none are suitable.

m NPPF paragraph 111 states that *'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.'.* As demonstrated within this report the impacts would be severe.

n Overall, it is concluded that there are many highway safety reasons to object to the proposed planning application for gravel extraction.

Figures

Figure 4.1 – Swept Path of Lorries at Proposed Access


YES ENGINEERING
Suite E, Maples Business Centre
144 Liverpool Road
London, N1 1LT
Client: WAGE
Drawing No.: Figure 4.1
Scale: 1:500@A4
Revision: -
Oak
12m high 16.8
Access
Culvert
1.8m high hedge
surface ditch
Visibility
2.4m x 5
15.5m
Visibility splay
x 59m
Large Tipper
Overall Length 10.201m
Overall Width 2.495m
Overall Body Height 2.890m
Min Body Ground Clearance 0.341m
Track Width 2.471m
Lock to lock time 6.00s
Kerb to Kerb Turning Radius 11.550m
Oak
12m high 16.8
Access
Culvert
1.8m high hedge
surface ditch
Visibility spl
2.4m x 59m
15.5m
Visibility splay
Large Tipper
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Overall Width 2.495m
Overall Body Height 2.890m
Min Body Ground Clearance 0.341m
Track Width 2.471m
Lock to lock time 6.00s
Kerb to Kerb Turning Radius 11.550m
NOTES:
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Figure 4.2 – Swept Path of Lorries at Brocks Copse Road/Alverstone Road Amended Junction

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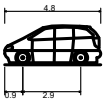
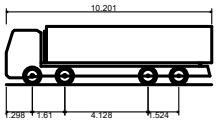
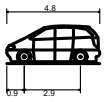
Client: WAGE
Drawing No.: Figure 4.2
Scale: 1:500@A4
Revision: -



Standard Design Vehicle (SDV)	
Overall Length	4.800m
Overall Width	2.000m
Overall Body Height	1.950m
Min Body Ground Clearance	0.100m
Track Width	2.000m
Lock to lock time	4.00s
Wall to Wall Turning Radius	6.000m



Large Tipper	
Overall Length	10.201m
Overall Width	2.495m
Overall Body Height	2.890m
Min Body Ground Clearance	0.341m
Track Width	2.471m
Lock to lock time	6.00s
Kerb to Kerb Turning Radius	11.550m



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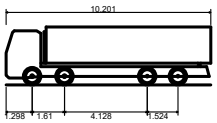

Large Tipper	
Overall Length	10.201m
Overall Width	2.495m
Overall Body Height	2.890m
Min Body Ground Clearance	0.341m
Track Width	2.471m
Lock to lock time	6.00s
Kerb to Kerb Turning Radius	11.550m

NOTES:

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Figure 4.3 – Forward Visibility Plan

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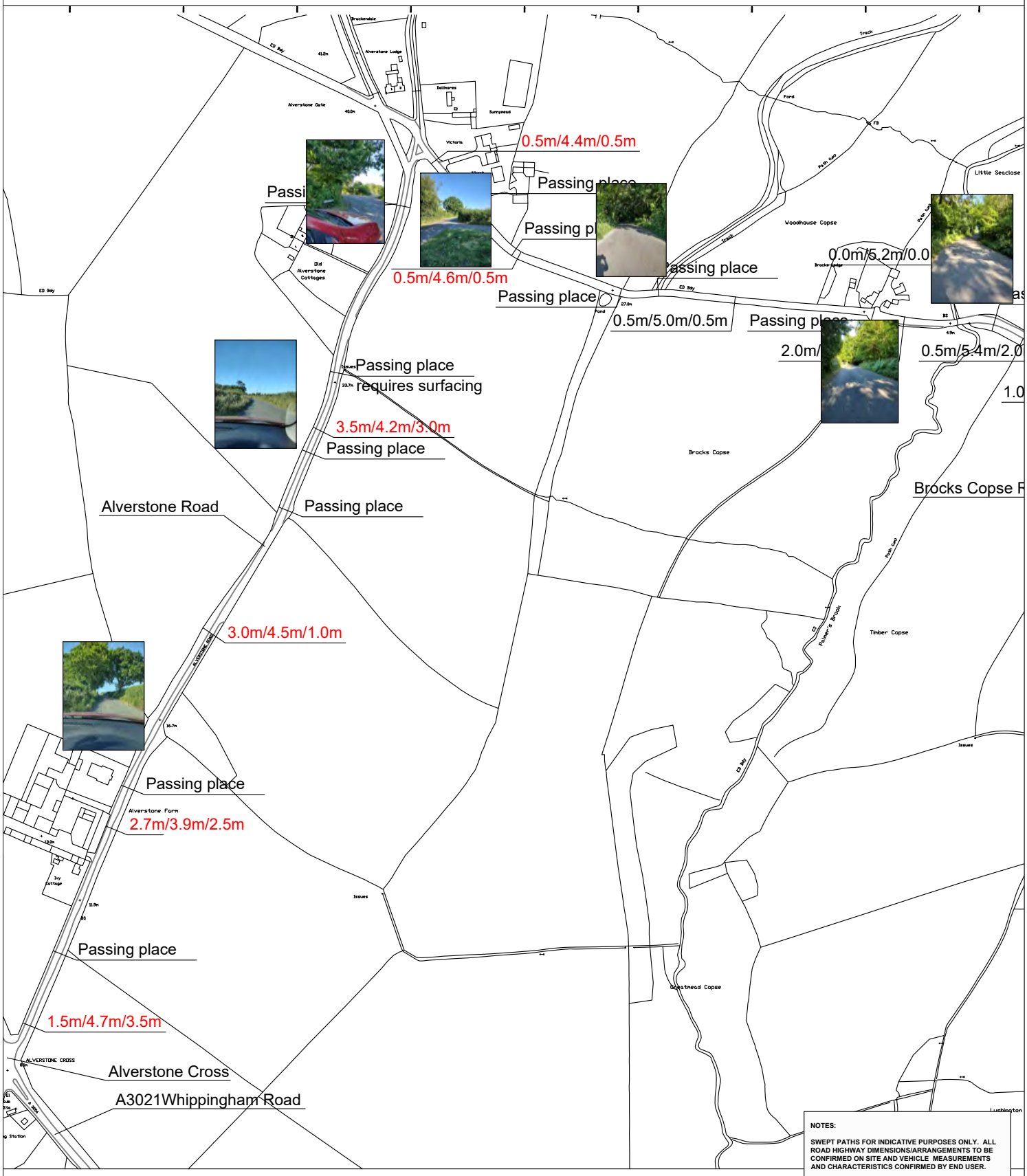
Client:	WAGE
Drawing No.:	Figure 4.3
Scale:	NTS
Revision:	-



NOTES:

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