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The Farmers Field, Seaview, Isle of Wight

Technical Note - Response to Additional  
Highways Information

October 2021

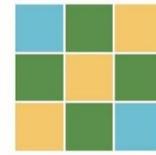


The Farmers Field,  
Seaview, Isle of Wight

*Technical Note - Response to Additional Highways Information - Issue 02*

21-0258

October 2021



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## 1. Introduction

- 1.1 Cotswold Transport Planning Ltd (CTP) has been instructed by savethedonkeyfield.co.uk to prepare a Technical Note (TN) to review the additional highways information submitted in relation to the proposed construction of eight dwellings and formation of vehicular access on land, known locally as 'The Farmers Field', at Seagrove Farm Road, Seaview, Isle of Wight - LPA Ref (21/00779/FUL).
- 1.2 It is acknowledged that the land was listed as an allocated site for housing, together with the adjacent land (Housing Allocation Reference Number HA073 - Land at Seagrove Farm Road & Land off Solent View Road, Seaview) for at least 25 dwellings in the Draft Island Planning Strategy Development Plan (November 2018). This followed the site being identified in the 2018 strategic housing land availability assessment (SHLAA) as SHLAA sites IPS104 - Land off Solent View Road Seaview PO35 (Land to the rear of 51 - 67) (The Donkey Field) and IPS125 - Land at Seagrove Farm Road, Seaview (The Farmers Field).
- 1.3 However, it is highlighted that the sites have been removed from the latest Draft Island Planning Strategy, published for Regulation 18 consultation – July 2021 version, and now no longer form part of the development plan.
- 1.4 A planning application was submitted in May 2021 and a Transport Statement, produced by Transport Seeds, was submitted to assess the highways and transport implications. As part of the statutory consultation the Local Highway Authority, Island Roads, recommended that the application be refused citing inadequate access visibility, inadequate access width, generation of traffic onto public highway and parking provision.
- 1.5 The Island Roads consultation response is attached at **Appendix A**.
- 1.6 A Letter of Objection was produced by CTP on behalf of savethedonkeyfield.co.uk in June 2021 and reviewed the Transport Statement, produced by Transport Seeds, in relation to the aforementioned planning application - LPA Ref (21/00779/FUL).



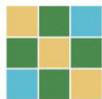
- 1.7 The Letter of Objection is attached at **Appendix B**.
- 1.8 Further information was subsequently submitted by the applicant in July 2021 in the form of a Technical Note, produced by Transport Seeds, in response to the Island Road consultation comments.
- 1.9 The Transport Seeds Technical Note is attached at **Appendix C**.
- 1.10 The purpose of this TN is to undertake a transport and highways review of the additional information submitted by Transport Seeds in support of the planning application - LPA Ref (21/00779/FUL).
- 1.11 The TN concludes that the impact of the proposed development has not been adequately assessed, safe and suitable access has not been demonstrated to be achievable and the local highway network is substandard to accommodate the development traffic likely to be generated by the development proposal.

### *Planning Context*

- 1.12 It is noted that a separate planning application for land to the rear of Solent View Road to erect nine residential dwellings has recently been submitted in September 2021 (LPA Ref. 21/01776/FUL), with the same means of access via Seagrove Farm Road. If both applications are granted planning permission, this would bring the potential total number of residential dwellings to 17, all to be served via Seagrove Farm Road. At the time of writing, the application is yet to be determined.
- 1.13 For the purpose of this TN the cumulative impacts of both sites (The Donkey Field & The Farmers Field) have been assessed as a sensitivity test. This is deemed necessary to properly assess the proposals. Transport Seeds have not considered the cumulative impact in either their Transport Statement submitted with the planning application or their subsequent Technical Note, in response to the Island Road consultation comments.

## **2. Inadequate Access Visibility**

- 2.1 Any new or intensification in use of vehicle accesses should be reviewed and justified as being able to provide visibility splays in accordance with the relevant national guidance (i.e. Manual for Streets (MfS) & Manual for Streets 2 (MfS2), the Design Manual for Roads and Bridges (DMRB)) or local guidance as appropriate.



### *Old Seaview Lane / Steyne Road Junction*

- 2.2 Island Roads' consultation response (May 2021) confirms that visibility splays of 2.4m x 43m in both directions are appropriate for this junction in accordance with MfS and a 1m offset is acceptable. The response concludes that visibility to the north is achievable but due to the alignment of the carriageway the maximum visibility to the south is 33m, which makes the existing junction a sub-standard access onto the highway and not suitable for an intensification in use.
- 2.3 The Transport Seeds Technical Note submitted in response to the highway's consultation at paragraph 2.4 reiterates that Drawing TS6003-HW-1001, submitted with the Transport Statement, demonstrates that 43m visibility can be achieved in both directions, which contradicts Island Roads assessment.
- 2.4 It is highlighted that that the emerging visibility splays demonstrated in Drawing TS6003-HW-1001 have not been plotted with highway boundary data.
- 2.5 It is imperative that visibility assessments are shown with the highway boundary as it confirms whether visibility splays are deliverable within the public highway and not reliant on third-party land.
- 2.6 As the proposed development will result in an intensification in use of the existing junction it is necessary to demonstrate that junction visibility is suitable. Thus, CTP has undertaken a desktop visibility assessment of the Old Seaview Lane / Steyne Road junction using OS data and plotted against highway boundary records, obtained from Island Roads (see **Appendix D** for highway boundary).
- 2.7 The visibility assessment is shown on **Drawing SK01**, attached at **Appendix E**.
- 2.8 Based on this desktop assessment, to the south, it would appear that 2.4m x 43m visibility splay is achievable, measured with 1m offsets. However, this is measured on OS mapping, to the back extent of highway boundary and on the ground may not actually be achievable following on-site measurements. There is clearly some discrepancy between the different assessments and CTP would suggest that the achievable visibility needs to be confirmed by on-site measurements and/or topographical survey.



2.9 To the north, it would appear that visibility is actually restricted by third party land. Based on this desktop assessment, a sub-standard visibility splay of 2.4m x 13.6m, measured with 1m offsets, is shown achievable within the extent of public highway. This is 29.4m short of the required 43m. On this basis visibility to the north is not actually achievable within the adopted highway without a reliance on third-party land and therefore CTP conclude that the existing junction is substandard and not suitable for an intensification in use.

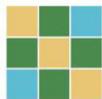
*Seagrove Manor Road / Seagrove Farm Road Junction*

2.10 Island Roads' consultation response confirms that visibility splays of 2.4m x 25m in both directions are appropriate for this junction in accordance with MfS.

2.11 The Transport Seeds Transport Statement demonstrates visibility splays of 2.4m x 25m in Drawing TS6003-HW-1001, however these cannot be achieved within the existing public highway boundary or land within the applicant's control. Island Roads conclude that *"this is a sub-standard access and cannot be supported"* and on this basis visibility splays cannot be provided and maintained in perpetuity without recourse to third-party land.

2.12 The Transport Seeds Technical Note submitted in response to the highway's comments at paragraph 2.6 states that *"...the local constraints along Seagrove Manor Road, lack of accident records and the limited number of properties serve by Seagrove Manor Road to the right of the access, combine to ensure that the available visibility has not given rise to any safety concerns in the past 20 + years"*.

2.13 Visibility at the junction of Seagrove Manor Road with Seagrove Farm Road is severely restricted in both directions by third party land. Seagrove Farm Road is unadopted and the extent of public highway on Seagrove Manor Road is the rear of the footway to the west of the junction (stopping short of the junction itself) and the edge of carriageway to the east of the junction. The visibility to the east (looking right) is hindered further by an existing tree on the corner, which is subject to a Tree Preservation Order (TPO).



- 2.14 It was confirmed by CTP on site that visibility at the junction is severely restricted and in line with the Island Roads consultation response advising that the achievable visibility is actually only 2.4m x 6m to the east (looking right) and 2.4m x 10m to the northwest (looking left), which is substantially below the required visibility splays and therefore not compliant.
- 2.15 The Island Roads consultation response highlights that the extent of the public highway to the east of the junction is the edge of carriageway and therefore the existing achievable visibility would not be improved by any trimming back of the overhanging hedge / vegetation on the southern side of the carriageway. The hedge is in third party ownership.
- 2.16 The response also notes the presence of the very mature tree in this location, which would need to be removed in addition to the hedge in order to deliver the required visibility splays. All of this land is in third party ownership. Furthermore, the tree is subject to a TPO.
- 2.17 To the northwest, the Island Roads response highlights the point identified by CTP on site that although a visibility splay in excess of 2.4m x 10m currently exists in this direction, it crosses third party land and therefore cannot be relied upon. The Island Roads consultation response confirms that there is no planning condition requiring the visibility splay across this third-party land to be maintained in perpetuity.
- 2.18 Despite the additional information provided by Transport Seeds in response to the consultation response it has still not been demonstrated that the proposed access arrangements are safe and suitable, in accordance with paragraph 110 of the National Planning Policy Framework (NPPF).
- 2.19 The visibility at the Seagrove Manor Road / Seagrove Farm Road junction is severely restricted and cannot be improved within the extent of existing public highway or land within the control of the applicant. The proposed development is to be served from Seagrove Farm Road, increasing the number of vehicular and non-motorised trips through the junction. The proposed development would exacerbate the existing highway safety issues, increasing the likelihood of conflicting movements at the junction, such that the residual cumulative impacts on the road network would be severe.



### 3. Inadequate Access Width

3.1 Island Roads' consultation response raised concerns as to the narrow effective widths of both Seagrove Manor Road and Seagrove Farm Road.

3.2 The Transport Seeds Technical Note submitted in response to the highway's comments at paragraph 3.1 - 3.3 states that "... *These issues and the impact of the proposed development have been addressed in paras 3.2.9 and 3.2.10 and Section 3.5 of the Transport Statement and it is a matter of opinion whether the existing reduction in effective width as a result of on-street parking along Seagrove Manor Road represents a material safety issue, especially as Island Roads has acknowledged that this acts as a traffic speed reduction feature in any event.*

*Furthermore, proposals to improve and enhance Seagrove Farm Road have been submitted as shown on Drawing TS6003-HW-1001, which will benefit both existing and future users of the corridor and specifically non-motorised users. The enhancements will also provide improved access for emergency and refuse vehicles which currently cannot turn around at the end of Seagrove Farm Road, but which will be able to do so from the proposed new residential access road in future.*

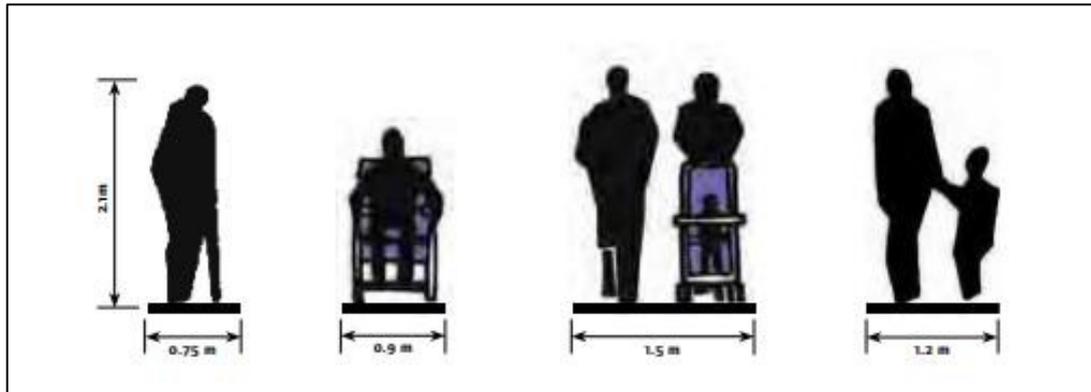
#### *Seagrove Manor Road*

3.3 Seagrove Manor Road is a residential street, which cumulatively serves in the order of 43 existing dwellings. MfS states that "*Carriageway widths should be appropriate for the particular context and uses of the street.*" (MfS, March 2007, 7.2.2). Development of the site for eight dwellings would increase the number of residential dwellings served from Seagrove Manor Road to in excess of 50 dwellings, which typically requires a traditional residential street arrangement with a minimum carriageway width of 4.8m - 5m.

3.4 The width of Seagrove Manor Road is limited to approximately 4.1m - 4.2m wide. This is generally wide enough to allow two cars to pass on straight sections at slow speed but not wide enough to allow two larger vehicles to pass one another or a car and delivery van or truck, for example. On bends, this limited width means that even two cars cannot pass one another and if two vehicles meet on these sections on the road, it is commonplace for at least one vehicle to mount the kerb in order to pass.



- 3.5 Clearly this is a highway safety issue and the potential for conflicting movements on Seagrove Manor Road would increase with the additional vehicles associated with the proposed development. This in turn would increase the likelihood of vehicles being required to mount the kerb to pass thus increasing the highway safety risk.
- 3.6 The width of Seagrove Manor Road would need to be increased to a minimum of 4.8m - 5m to allow two cars to comfortably pass one another, although further localised widening may still then be required on bends. It would also generally allow a car and larger vehicle, such as a delivery van, to pass one another on the straight at slow speed. However, there is no scope to widen the existing carriageway on Seagrove Manor Road. Narrow carriageway widths encourage pavement parking, where off-street parking is insufficient or not available, which was observed on site. This can impact on residential amenity as well as being a potential highway safety concern with regards to emergency vehicle access.
- 3.7 The width and alignment of the carriageway means that any on street parking along Seagrove Manor Road (observed on site visit) is forced to occur half on the footway and half on carriageway so to maintain the free movement of vehicles along the carriageway, which subsequently poses a hazard to pedestrians. Any vehicles parking solely within the carriageway would pose an obstruction to other vehicles. When considering the traffic generation attributable to the proposals compared with the existing daily traffic movements that occur on this part of the highway network, discussed later, the proposal will result in a significant uplift in daily traffic movements on the highway network.
- 3.8 While not a permanent feature the site visit identified that existing on-street parking practices on Seagrove Manor Road negatively impact on pedestrian accessibility.
- 3.9 Inclusive Mobility (2005) advises that, ideally, the width of footways should be unobstructed and 2m to facilitate two people in wheelchairs to pass each other comfortably. The footway dimensions required to accommodate different pedestrian users are provided within MfS - Pg.68 and shown in **Figure 3.1**.



**Figure 3.1: Footway Width to Accommodate Pedestrians - MfS pg 68**

- 3.10 As detailed in **Figure 3.1** MfS indicates that a width of 1.5m is advisable to accommodate a wheelchair / pram user and an ambient person side-by-side. For someone who uses a wheelchair 0.9m is advisable and for a walking aid 0.75m is advisable. Inclusive Mobility (2005) references a person who uses two sticks or crutches, or a walking frame requires a minimum of 0.9m and a blind person using a long cane or with an assistance dog needs 1.1m.
- 3.11 The existing footways are severely restricted when pavement parking occurs and well below the recommended footway widths to suitably accommodate pedestrians as stated within MfS.
- 3.12 These issues will be further exacerbated by an increase in vehicle movements along Seagrove Manor Road. The existing restricted carriageway width of Seagrove Manor Road, with no scope for improvements, means that the surrounding highway network is unsuitable in typical highway design terms for both pedestrians and vehicles and is unsuitable to accommodate additional development.
- Seagrove Farm Road*
- 3.13 Seagrove Farm Road is unadopted and unsurfaced. The lane is single track with the carriageway measuring approximately 3m in width and a verge to both sides, although this is minimal and raised along much of its length.



- 3.14 The Transport Seeds Technical Note reiterates the proposals to improve and enhance Seagrove Farm Road, as shown in the submitted Transport Statement on Drawing TS6003-HW-1001. The drawing demonstrates proposals to widen the section of Seagrove Farm Road between the Pavilion entrance and the Seagrove Manor Road junction. It is suggested by Transport Seeds that the carriageway can be increased in width here to 4.8m to allow two vehicles to pass; however, on site observations suggest that this is not the case. There appears to be little scope to increase the usable carriageway width here.
- 3.15 This section of Seagrove Farm Road, between the Pavilion entrance and the junction with Seagrove Manor Road, is approximately 30m in length. There is a small verge on the western side and a verge and mature hedge on the eastern side. Vehicles exiting onto Seagrove Manor Road are currently able to wait in the vicinity of the Pavilion entrance to allow a vehicle travelling southbound on Seagrove Farm Road to pass; however, due to the limited space around the junction of Seagrove Manor Road / Seagrove Farm Road, a vehicle cannot wait on Seagrove Manor Road in the vicinity of the junction and would need to reverse on the public highway to allow a vehicle to exit.
- 3.16 In addition to the queries regarding the physical constraints on Seagrove Farm Road; as highlighted above, there are also questions with regards to land control in the vicinity of the Seagrove Manor Road junction, which need to be confirmed. The Transport Statement and additional Technical Note prepared by Transport Seeds have not demonstrated that the applicant has sufficient control to undertake the works proposed.
- 3.17 To the south of the Pavilion entrance, there appears to be scope, subject to land control, to provide a wider section of carriageway or a passing place(s) to allow two vehicles to pass. On site observations would suggest that this area is already informally used for passing, or potentially car parking associated with the Sports Pavilion or Football Club, as there is evidence of vehicles using the verge on the western side adjacent to the Football Field.
- 3.18 There are a number of mature oak trees along the western side of the carriageway and any proposed works to widen the carriageway would require input from an arboriculturalist in terms of the potential impact on the tree roots here.



- 3.19 The resultant cumulative increase in vehicular trips on the surrounding highway network (discussed further below) as a result of a residential development would increase the likelihood of conflicting vehicle movements on the surrounding highway network. In the immediate vicinity of the site, particularly on Seagrove Manor Road and Seagrove Farm Road, where highway safety concerns already exist with regards to constrained carriageway widths and restricted junction visibility, it is considered that the additional vehicle trips arising from residential development of the site would result in a direct impact on highway safety.
- 3.20 The Transport Seeds Technical Note still does not demonstrate that safe and suitable access can be achieved in accordance with paragraph 110 of the NPPF. It is considered that the proposed development would result in an unacceptable impact on highway safety and the residual cumulative impact on the road network would be severe. The proposals are therefore contrary to paragraph 111 of the NPPF.

#### **4. Traffic Generation onto Public Highway**

- 4.1 Island Roads' consultation response raised concerns that the proposed development "...would generate a significant increase in vehicular traffic entering and leaving the public highway (Seagrove Manor Road/Seagrove Manor Road J/w Old Seaview Lane/Old Seaview Lane j/w Steyne Road), which is limited in width to the detriment of highway safety and would add unduly to the hazards of highway users".
- 4.2 The Transport Seeds Technical Note submitted in response to the highway's comments refers to the submitted Transport Statement trip generation assessment. Table 3.1 of the Transport Statement summarises the overall net trip impact of the proposed development and considers both the existing daily two-way movements on the highway network (Seagrove Farm Road and Seagrove Manor Road / Close) and the proposed two-way movements (eight additional dwellings) with vehicular trip rates derived from the TRICS database.
- 4.3 As acknowledged in the Transport Statement there were no suitable Isle of Wight sites in the TRICS database and the search was broadened to include counties in England, excluding Greater London. As such, the sites identified from TRICS for the purpose of analysis are not necessarily comparable to this site and it is considered that appropriate trip rates should have been derived from a similar 'donor site' on the Isle of Wight, which would have been more representative of local conditions.



- 4.4 Table 3.1 of the submitted Transport Statement states that the proposed development is predicted to result in four two-way vehicle trips in both the AM peak (08:00 - 09:00) and PM peak (17:00 - 18:00) and 30 two-way (07:00 - 19:00) daily vehicle trips across a 12-hour period.
- 4.5 This increase would be in addition to the 50 two-way daily vehicle trips from the existing properties served by Seagrove Farm Road (a total of 13 dwellings as quoted by Transport Seeds) and the 79 two-way daily vehicle trips from the properties served by Seagrove Manor Road/Close (a total 21 dwellings as quoted by Transport Seeds) if the same trip rates were applied. It is highlighted that CTP disagree with the dwelling totals quoted in the Transport Seeds Transport Statement. However, against the background traffic flows calculated by Transport Seeds, the daily traffic increase as a result of the proposed development represents a 23% across a 12-hour period of what is currently experienced on Seagrove Manor Road. Transport Seeds conclude that this is not considered to be significant particularly when spread over the day.
- 4.6 However, CTP considers that a 23% rise in daily traffic movements represents a significant increase in the context of a substandard highway network and low existing traffic flows. Furthermore, the cumulative impact with The Donkey Field planning application (LPA Ref. 21/01776/FUL) has not been properly considered throughout the Transport Seeds Transport Statement or their additional Technical Note.
- 4.7 The Transport Seeds Transport Statement states at paragraphs 2.1.2 and 2.1.4 that Seagrove Farm Road currently serves 13 existing properties and as such the resultant impact of an additional eight dwellings is not considered to be significant.
- 4.8 However, this assumes that properties in Seagrove Manor Close currently use Seagrove Farm Road for access. From information gleaned from CTP's site visit, and also from information received from residents, available on the Planning Portal, it is understood that this is not accurate. The residents of Seagrove Manor Close invariably use Seagrove Manor Road for access. Thus, the actual number of properties using Seagrove Farm Road for access equates to six dwellings and 23 two-way trips across a 12-hour period, if the same trip rates in the Transport Statement were applied. Therefore, an additional eight dwellings, which, if permitted, would actually represent a 130% increase across a 12-hour period along Seagrove Farm Road.



4.9 When considering the nature of the development proposal (eight dwellings), it is seen to bring about a significant uplift in daily traffic movements (circa 130%) on Seagrove Farm Road that is limited in respect to width and through an existing junction 'Seagrove Farm Road / Seagrove Manor Road' that is limited in respect to both width and visibility to the detriment of highway safety.

4.10 In view of the potential trip generation of the site, substandard highway network and low existing traffic flows, such increases would be significant and would have a severe residual cumulative impact on the surrounding highway network. The effects are therefore considered to be significant or severe in relation to paragraph 111 of the NPPF.

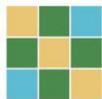
*Sensitivity Test*

4.11 As discussed, a separate planning application for The Donkey Field to erect nine residential dwellings has recently been submitted (LPA Ref. 21/01776/FUL), with the same means of access of an extension to Seagrove Farm Road. If both applications were to be granted, this would bring the potential total number of units to 17, all to be served from Seagrove Farm Road.

4.12 Consideration therefore needs to be given to the combined transport impacts of both sites as a sensitivity test to properly assess the proposals.

4.13 For the purpose of this assessment a cumulative impact assessment has been undertaken comparing both the Donkey Field (LPA Ref. 21/01776/FUL) and the Farmers Field (LPA Ref: 21/00779/FUL) planning applications against the existing two-way daily vehicle trips on Seagrove Farm Road.

4.14 The results of this assessment are set out in **Tables 4.1 - 4.2**.



Comparison	Peak Period	Cumulative Trip Impact Assessment		
		Forecast Trips		
		Arrivals	Departures	Two-way
Existing Traffic (Seagrove Farm Road) 13 Dwellings - Transport Seeds	12-hour (07:00 - 19:00)	25	25	50
The Farmers Field (21/00779/FUL)	12-hour (07:00 - 19:00)	15	15	30
The Donkey Field (21/01776/FUL)	12-hour (07:00 - 19:00))	17	17	34
Comparison	12-hour (07:00 - 19:00)	<b>57 (+32)</b>	<b>57 (+32)</b>	<b>114 (+64)</b>

**Table 4.1 Cumulative Trip Impact Assessment of Farmers Field & Donkey Field Planning Applications on Seagrove Farm Road - Transport Seeds 13 Dwellings**

4.15 **Table 4.1**, based on a total of 13 existing properties served via Seagrove Farm Road (as quoted by Transport Seeds), indicates that the actual proposed cumulative impact of both planning applications (17 dwellings) could result in an increase of approximately 64 two-way vehicle trips across Seagrove Farm Road over a 12-hour period, which represents a 128% increase over existing traffic levels.

Comparison	Peak Period	Cumulative Trip Impact Assessment		
		Forecast Trips		
		Arrivals	Departures	Two-way
Existing Traffic (Seagrove Farm Road) 6 Dwellings	12-hour (07:00 - 19:00)	11	11	22
The Farmers Field (21/00779/FUL)	12-hour (07:00 - 19:00)	15	15	30
The Donkey Field (21/01776/FUL)	12-hour (07:00 - 19:00))	17	17	34
Comparison	12-hour (07:00 - 19:00)	<b>43 (+32)</b>	<b>43 (+32)</b>	<b>86 (+64)</b>

**Table 4.2 Cumulative Trip Impact Assessment of Farmers Field & Donkey Field Planning Applications on Seagrove Farm Road - 6 Dwellings**

4.16 Furthermore, as indicated in **Table 4.2**, the actual number of properties using Seagrove Farm Road for access equates to six dwellings and 23 two-way trips across a 12-hour period. Therefore, the cumulative impact of both The Donkey Field and Farmers Field planning applications on Seagrove Farm Road would be an additional 64 two-way trips across a 12-hour period, which represents a 291% increase.



4.17 In view of the potential trip generation of both sites, such increases would be significant and would have a severe residual cumulative impact on the surrounding highway network. The effects are therefore considered to be significant or severe in relation to paragraph 111 of the NPPF.

## 5. Parking Provision

5.1 Island Roads' consultation response evaluated the proposed parking layout and noted that for Plot 2 there is only sufficient space for 1 vehicle to be parked as the length and width do not allow for a second vehicle. Plot 2 is a three-bedroom dwelling requiring two parking bays. It is noted that there is sufficient space for a widening the drive to allow two cars to be parked side by side.

5.2 The Transport Seeds Technical Note submitted in response to the highway's comments at paragraph 5.1 states that the layout could easily be modified to address the parking concerns at Plot 2.

5.3 However, the additional space has not been shown on a revised layout and swept paths have not been undertaken to demonstrate the suitability of a reconfigured layout to enable vehicles to access / egress in a forward gear and suitably manoeuvre internally at Plot 2.

## 6. Summary

6.1 CTP has prepared this TN on behalf of savethedonkeyfield.co.uk in relation to the proposed construction of eight dwellings and formation of vehicular access on The Farmers Field at Seagrove Farm Road, Seaview, Isle of Wight - LPA Ref (21/00779/FUL).

6.2 The TN is submitted further to CTP's letter of objection, dated June 2021, on behalf of savethedonkeyfield.co.uk in relation to LPA Ref (21/00779/FUL).

6.3 Further information has subsequently been submitted by the applicant in July 2021 in the form of a Technical Note, produced by Transport Seeds, in response to the Island Road consultation response.



- 6.4 From a transport and highways perspective, despite the additional information, there are still a number of matters and concerns in respect of the access arrangements including visibility, access width and traffic generation, which identify issues relating to highway safety and impact on the local road network.
- 6.5 It is considered that safe and suitable access cannot be demonstrated in accordance with paragraph 110 of the NPPF and, with reference to paragraph 111 of the NPPF, residential development of the site for up to eight dwellings would result in an unacceptable impact on highway safety, and the residual cumulative impacts on the road network would likely be considered severe.
- 6.6 Taking all of this into consideration, CTP concludes that the proposed residential development of The Farmers Field (21/00779/FUL) is not acceptable in transport and highways terms and planning permission should not be granted.



## Appendices

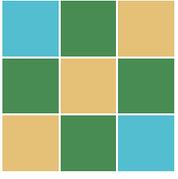
Appendix A Island Roads Consultation Response - May 2021

Appendix B CTP Letter of Objection - June 2021

Appendix C Transport Seeds Technical Note - July 2021

Appendix D Island Roads Extent of Public Highway Records

Appendix E CTP Drawing SK01 - Visibility Assessment: Old Seaview Lane / Steyne  
Road Junction



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## Appendix A

## **HIGHWAYS REPRESENTATION**

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### **RECOMMENDATION FOR REFUSAL**

Planning Reference: 21/00779/FUL

Location: Land at, Seagrove Farm Road, Seaview

Proposal: Proposed construction of eight dwellings and formation of vehicular access.

Road Status: Seagrove Farm Road - Unclassified – Unadopted

Seagrove Manor Road – Unclassified

Old Seaview Lane – Unclassified

Steyne Road – Classified 'B' Road

Date of Site Visit: 26.05.2021

Date of Report: 28.05.2012

Planning Case Officer: Richard Holmes

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This application seeks consent for the construction of eight dwellings (2 x two-bedroom, 2 x three-bedroom, 2 x four-bedroom and 2 x four/five-bedroom) within a plot of land that is currently a greenfield site off of Seagrove Farm Road, the scheme also incorporates the construction of the associated carriageway and access onto Seagrove Farm Road. Seagrove Farm Road is a narrow (3.1m) unmade track that forms a junction on to Seagrove Manor Road, which is a narrow (circa 4.3m) residential public highway which then in turn forms a junction with Old Seaview Lane and then onto the junction with Steyne Road.

#### **Geometry**

Seagrove Farm Road, Seaview is an unclassified unadopted track governed by a 30mph speed limit at the point in question. However, it is accepted that vehicles are restricted by way of the environment to circa 20mph (although this has not been backed up by speed data). In accordance with design standards (MfS/MfS2) any new or existing vehicle access forming a junction with this part of the highway network should provide for a minimum visibility splay of X= 2.4m by Y= 25.0m.

Seagrove Manor Road, Seaview is an unclassified public highway governed by a 30mph speed limit at the point in question. However it is accepted that vehicles are restricted by way of the environment and are more representative of a 20mph type environment (although this has not been backed up by speed data). In accordance with design standards (MfS/MfS2) any new or existing vehicle access forming a junction with this part of the highway network should provide for a minimum visibility splay of X= 2.4m by Y= 25.0m.

Old Seaview Lane, Seaview is an unclassified public highway governed by a 30mph speed limit at the point in question. In accordance with design standards (MfS/MfS2) any new or existing vehicle access forming a junction with this part of the highway network should provide for a minimum visibility splay of X= 2.4m by Y= 43.0m.

Steyne Road, Seaview is a classified 'B' public highway governed by a 30mph speed limit at the point in question. In accordance with design standards (MfS/MfS2) any new or existing vehicle access forming a junction with this part of the highway network should provide for a minimum visibility splay of X= 2.4m by Y= 43.0m.

In addition to the above any new access should also provide for:

- An associated drainage system to minimise the risk of surface water runoff onto the public highway.
- Where the vehicle access crosses a public footway, the maximum acceptable gradient is 1in20.
- The access should be located a minimum of 11.0m from any adjacent road junction or defined pedestrian crossing point.
- Should the access be gated a minimum gate setback of 5.0m from the edge of the adjacent carriageway should be provided.

With the associated onsite layout providing for.

- A minimum clear usable access width of 5.0m over the first 10.0m from the junction with the public highway to ensure that two private motor vehicles can pass with ease without obstructing the adjacent public highway when entering and egressing the site concurrently.
- Beyond the initial junction with the public highway the onsite access road should provide for a width of no less than 3.70m with associated passing bays (to ensure ease of access and passing for emergency / service and private motor vehicles.
- Space within the confines of the site for the parking and turning of conventional private motor vehicles so they may enter and exit the public highway in forward gear. In some instances where space is limited the introduction of a vehicle turn table may address this matter.

- Parking provision at a level reflective of the Local Authority Parking Guidelines.
- All proposed parking bays where set perpendicular must provide for minimum dimensions of 2.40m by 4.80m, and where set parallel and adjacent to a classified public highway must be a minimum of 3.5m by 8.0m with a maximum depth of 4.0m to prevent nose-in parking. (dimensions of 3.0m by 6.0m would be acceptable adjacent to an unclassified carriageway).
- A fire appliance will need to be able to reach within 45.0m of the principle access of each proposed dwelling and be provided with a minimum access width of 3.70m and not have to reverse over a greater distance than 20.0m. Where these standards are not met, your submission will need to include for written confirmation of support from the Local Chief Fire Officer.
- Refuse storage and collection facilities in line with the Guidelines for Recycling and Refuse Storage in New Developments dated January 2017.

In addition to the above, should the proposal bring about the need to relocate existing street furniture and an appropriate location be available, all associated costs will need to be met by the applicant.

On review of the submitted information which takes the form of a 'Transport Statement' and drawings (2122) L1, P1, P2A, P3, P4, P5 and P6 and when coupled with onsite observations and measurements, this office can make the following comments.

The visibility sight line distance has been assessed for all the junctions leading from the development access onto Seagrove Farm Road up to and including the junction onto Steyne Road and can be reported as:

- **Proposed Development Access:** The Visibility sight line distance (Y) when measured from a point 2.4m(X) back from the edge of carriageway at a height of 1.0m, central to the access and to a point offset 1.0m from the near kerb line (kerb on development side) between the heights of 0.6m and 2.0m above the carriageway has been shown to be circa 34m to both the east and the west and is therefore in excess of the required 25m.
- **Seagrove Farm Road J/w Seagrove Manor Road:** The Visibility sight line distance (Y) when measured from a point 2.4m(X) back from the edge of carriageway at a height of 1.0m, central to the access and to a point offset 1.0m from the near kerb line (kerb on development side) between the heights of 0.6m and 2.0m above the carriageway has been shown to be circa 6.0m east and 10.0m north-west and is therefore not compliant with required relaxation of a 25m splay distance. It is noted that drawing L1 depicts the red line boundary to encompass the area land on the eastern side required to provide a compliant visibility splay indicating that the

applicant has control over this land, however section 3.2 of the Transport Statement describes this land as undeveloped land that the Highways Authority could use their powers to trim back the overhanging hedge to the highway boundary in order to provide a compliant splay thereby acknowledging that the land is not under the control of the applicant. For clarity the highway boundary is the edge of carriageway with the existing hedge overhanging by circa 50mm and any trimming back would not improve the existing visibility splay, whereby to achieve a compliant splay distance the whole hedge over a length circa 4.0 -5.0m of the frontage and a very mature tree would be required to be removed. Whereby this office cannot support this element (Should the LPA seek to grant consent then compliant visibility splays must be secured by way of Grampian condition). In addition to this the visibility to the north-west when viewed over the limit of the public highway is also found to be limited to just 10.0m, it is acknowledge that a compliant visibility splay exists but this is over third party land (driveway of Sea Whispers). Under the planning consent (P/00327/13) the layout of the block paving parking layout was approved in relation to the existing access, with the boundary treatment not being shown on the drawing whereby the removal of the section of wall to improve the visibility was at the owners own discretion and is not protected by way of any condition on the consent, whereby the continued betterment offered by this situation for perpetuity cannot be guaranteed. It is therefore the opinion of this office that this is a sub-standard access and cannot be supported. When taking the predicted traffic movements along Seagrove Farm Road into consideration it has been demonstrated by way of TRICS data that the proposals would generate a total of 30 additional movements per day, when included onto the existing 50 movements already attributable to the existing dwellings gives a new total of 80 in/out movements. This is an increase of 60% well in excess of the 5% threshold whereby concern is raised resulting in a sustainable reason for refusal.

- **Seagrove Manor Road j/w Old Seaview Lane:** The Visibility sight line distance (Y) when measured from a point 2.4m(X) back from the edge of carriageway at a height of 1.0m, central to the access and to a point offset 1.0m from the near kerb line (kerb on development side) between the heights of 0.6m and 2.0m above the carriageway has been shown to be in excess of the required 43m to both the north-east and south west and is therefore in compliant in terms of visibility.
- **Old Seaview Lane j/w Steyne Road:** The Visibility sight line distance (Y) when measured from a point 2.4m(X) back from the edge of carriageway at a height of 1.0m, central to the access and to a point offset 1.0m from the near kerb line (kerb on development side) between the heights of 0.6m and 2.0m above the carriageway has been shown to be in excess of the required 43m to the north but only 33m to the

south-west due to the alignment of the carriageway making this a sub-standard access onto the main highway.

When looking at the carriageway widths it is noted that Seagrove Farm Road is only circa 3.1m in width, causing potential conflict with other users (horses, cyclist, pedestrians and other vehicles). It is noted that the Transport Statement makes reference to the lane being widened to 4.8m, however any widening along the first 30m (between Sea Whispers and Seagrove House) would appear to be outside of the red line boundary. It is also noted that this would involve the significant removal of vegetation along the eastern side with the boundary between differing landowners being unclear. In addition, on review of the information available to this office it would appear that the maximum width achievable within this first section would appear to be 4.1m. This width would not allow two conventional motor vehicles to pass one another unhindered. In addition, section 3.2.10 states that the junction of Seagrove Farm Road onto Seagrove Manor Road that a vehicle can access concurrently with a vehicle egressing and has provided a swept path analysis (TS6003-TR-1002 Rev. A) to demonstrate this. However, on evaluation this is based on an ordinance survey plan whereby this office deems this not to accurately portray the real-world environment. The transport Statement does go on to say that this manoeuvre would in reality not happen as vehicles would wait for the junction to be clear before accessing on to the track. This can be confirmed as on a visual inspection at the time of the site visit this manoeuvre is believed to be problematic even with the western verge removed and the eastern vegetation trimmed back to any third-party boundary. Further to this it is noted that due to the narrow nature of Seagrove Manor Road that the swept path of an egressing vehicle turning left (north-west) takes up a significant extent of the carriageway width resulting in any stationary vehicles waiting to enter the track having to stop some distance from the junction to allow this manoeuvre.

Drawing TS6003-HW-1001 Rev. B shows the widening of Seagrove Farm Road to 4.8m and depicts a 6.5m long passing bay on the western side between the dwellings of 'Broadoak' and 'Dolphins' to provide a total width of 5.5m at that location, however this is shown to be outside of the red line boundary as shown on drawing L1. Based on the layout provided it is acknowledged that a forward visibility of a minimum of 25m could be achieved from this passing bay. However due to the limitations of the provided plans it is unclear if the 4.8m width can be accommodated along the whole route. Should the 4.8m be achievable within land under the applicants control then this would allow for two conventional vehicles to pass one another unhindered up to the point of the junction however, there is limited space for pedestrians, cyclists and horses to seek refuge in the event of two vehicles passing and no refuge at all for the 30m or so leading

to the junction thus putting these groups at risk of conflict with vehicles. Concern is therefore raised for the proposed shared space and the significant uplift (60%) in vehicular movements along this section of track.

When looking at the width of Seagrove Manor Road this has been measured at circa 4.3m with a footway on the northern side of circa 1.9m and on the southern of circa 1.3-2.0m. The narrow nature of the carriageway means that any on street parking along this route is forced to park half on the footway and half on carriageway so to maintain the free movement of conventional motor vehicles along the carriageway. Any vehicles parking solely within the carriageway are an obstruction no vehicles being able to safely pass unhindered. When looking at the traffic generation of the proposals (30 movements) compared with the existing traffic movements that are stated within the Transport Statement (79 Movements) then this gives rise to a 23% uplift along this sub-standard carriageway, again well in excess of the 5% threshold whereby it cannot be supported by this office.

When evaluating the swept path analysis it has been demonstrated that should the 4.8m width along Seagrove Farm is achievable without impinging into third party land then two conventional motor vehicles can pass one another unhindered, a fire tender can access the development and turn within the turning head provided and exit back onto the public highway in forward gear, in addition the fire tender can pass a conventional vehicle unhindered along the Seagrove Farm Road but there is conflict on the bend of the proposed carriageway for the development. Further to this the swept path shows an old DB32 refuse vehicle (Design Bulletin 32 is no longer in use) with is only 7.9m in length whereby the modern refuse vehicles commonly used are circa 10.0m in length. The refuse vehicle used by this office for evaluation purposes is a Phoenix -2-17N with Elite 26x2 chassis and is 10.196m in length. The vehicle is unable to enter the Seagrove Farm Road access in a safe manner and is unable to turn within the turning head provided however a conventional motor vehicle is able to pass unhindered along Seagrove Farm Road but as with a fire appliance is unable to at the bend within the proposed development.

When looking at the junction between Seagrove Manor Road and Old Seaview Lane the junction width is limited and does not allow for a conventional motor vehicle to enter concurrently with a vehicle waiting to exit whereby the uplift in traffic movement from the proposals about this junction cannot be supported.

When evaluating the parking layout it is noted that for:

- Plot 1 shows sufficient space for two vehicles to park on in front of the other with no vehicular turning required.

- Plot 2 that there is only sufficient space for 1 vehicle to be parked as the length and width do not allow for a second vehicle. Plot 2 is a three-bedroom dwelling requiring two parking bays. It is noted that there is sufficient space for a widening the drive to allow two cars to be parked side by side.
- Plot 3 allows for the parking of two vehicles but does not allow for the on-site reversing when two vehicles are on the drive however, it is noted that onsite turning is not a requirement in this location.
- Plot 4 allows for the parking of two vehicles but does not allow for the on-site reversing when two vehicles are on the drive however, it is noted that onsite turning is not a requirement in this location.
- Plot 5 allows for the parking of two vehicles but does not allow for the on-site reversing when two vehicles are on the drive however, it is noted that onsite turning is not a requirement in this location.
- Plot 6 allows for the parking of two vehicles but does not allow for the on-site reversing when two vehicles are on the drive however, it is noted that onsite turning is not a requirement in this location.
- Plot 7 allows for the parking of two vehicles with on-site turning or three vehicles without turning. It is noted that onsite turning is not a requirement in this location.
- Plot 8 allows for the parking of one vehicle with on-site turning or three vehicles without turning. It is noted that onsite turning is not a requirement in this location. In this instance as it is the end of the run vehicles would need to reverse out into the main turning head on the carriageway to exit the site in forward gear.

### Accessibility

The CIHT publication *'Planning for Walking'* published April 2015 identifies at paragraph 6.3 *'Land use planning for pedestrians'* that *'Most people will only walk if their destination is less than a mile away.'* It continues to explain that *'Walking neighbourhoods are typically characterised as having a range of facilities within 10 minutes' walking distance (around 800 metres).'* And that *'The power of a destination determines how far people will walk to get to it. For bus stops in residential areas, 400 metres has traditionally been regarded as a cut-off point and in town centres, 200 metres. People will walk up to 800 metres to get to a railway station, which reflects the greater perceived quality or importance of rail services.'*

In terms of accessibility it is noted that sections 2.1.9 to 2.1.12 deal with cycling and bus transport. However in regard to cycling the report refers to the aspirations to extend the Cycle Route through St Helens and Brading as published by Cycle Wight and endorsed by DCPA/AMW/01

the Isle of Wight Council, however this is not in place and there are no guarantees that it will come to fruition whereby this cannot be taken into consideration at this time. Whereby no Cycle infrastructure exists within the area at this current time. In terms of Bus infrastructure, it is noted that the nearest bus stop is the no. 8 located on Old Seaview Lane a 350m walk from the site with an alternative route to a bus stop would be to the stop on Solent View Road which can be accessed via the 1.5m link from the development onto Bridleway/public footpath resulting in a 425m walk that would avoid Seagrove Farm Road.

### Parking Provision

This site falls within Zone 2 as defined within the Guidelines for Parking Provision as Part of New Developments SPD January 2017 forming part of the Island Plan. In accordance with the guidance set out within Table 1, a development of this nature should typically provide sixteen vehicle parking spaces, sixteen cycle spaces and bin storage.

On evaluation, the applicant proposes to provide seventeen vehicles spaces and is therefore compliant with the above policy. However, as previously mentioned Plot 2 should be provided with 2 parking bays but only has 1 and would not be able to access the overprovision of bays as they are private driveways for separate dwellings. And therefore, cannot be supported by this office. For Clarity plots 2 and 4 require 1 bay each but have been provided with 2 bays each.

### Capacity / Traffic Impact

The traffic generation associated with this proposal will have a negative impact upon the operation of the junction between Seagrove Farm Road and Seagrove Manor Road and along Seagrove Manor Road whereby as there are no mitigating measures this increase in vehicle movements is contrary to policy SP7 (Travel) of the Isle of Wight Core Strategy.

### Accident Data

On review of accident data, there have been no recorded incidents in the last 3 years within the vicinity of this site that are relevant to the proposal.

### Materials Consideration

There are no materials considerations for this application.

### Mitigation Measures / Offsite Improvements

There are no mitigation measures or offsite highway improvement works required as a result of this application.

### Construction Impact

Seagrove Manor Road and Seagrove Farm Road are both limited in width whereby should the LPA seek to grant consent then a Construction Management Plane would need to be conditioned detailing the form of delivery of materials to the site, drop off areas, storage area, operative and visitor parking, delivery times and working times etc.

### Maintainability Assessment

The proposals do not result in any changes to the project network.

### Applicant Obligations

The applicant is required to make a formal application to Island Roads, St Christopher House, 42 Daish Way, Newport, Isle of Wight, PO30 5XJ, in accordance with the Town Improvement Clause Act 1987 Sections 64 & 65 and the Public Health Act 1925 Section 17 before addressing and erecting a property name / number or street name in connection with any planning approval.

## **Conclusion**

The proposals envisaged in this application have implications affecting the highway network and therefore I recommend refusal based on the following grounds: -

### **Inadequate Access Visibility**

The access is (Seagrove Farm Road J/W Seagrove Manor Road & Old Seaview Lane j/w Steyne Road) unsatisfactory to serve the proposed development by reason of unacceptable visibility and would therefore be contrary to Policy DM2 (Design Quality for New Development) of the Isle of Wight Core Strategy.

### **Inadequate Access Width**

The access (Seagrove Farm Road j/w Seagrove Manor Road/Seagrove Manor Road j/w Old Seaview lane/Old Seaview Lane j/e Steyne Road) is unsatisfactory to serve the proposed development by reason of unacceptable width and would therefore be contrary to Policy DM2 (Design Quality for New Development) of the Isle of Wight Core Strategy.

### **Generation of Traffic – onto public highway**

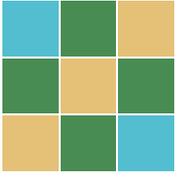
The proposed development would generate a significant increase in vehicular traffic entering and leaving the public highway (Seagrove Manor Road/Seagrove Manor Road J/w Old Seaview Lane/Old Seaview Lane j/w Steyne Road) which is limited in width to the detriment of highway safety and would add unduly to the hazards of highway users and would therefore be contrary to Policy DM2 (Design Quality for New Development) and DM17 (Sustainable Travel) of the Isle of Wight Core Strategy.

### **Parking Provision**

The proposal provides insufficient parking provision for Plot 2 and is therefore inconsistent with the guidelines set out by the Local Planning Authority in Policy DM17 Sustainable Travel, SP7 Travel and policy DM2 (Design Quality for New Development) of the Isle of Wight Core Strategy.

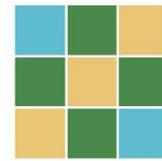
Officer: Alan Ransom – Highway Development Control Engineer

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COTSWOLD  
TRANSPORT  
PLANNING

## Appendix B



Planning  
Isle of Wight Council  
Richard Holmes – Case Officer

Date: 24<sup>th</sup> June 2021

Our ref: 21-0258

Dear Mr Holmes

**Planning Application Ref. 21/00779/FUL**

**Land At Seagrove Farm Road Seaview Isle Of Wight - Proposed construction of eight dwellings and formation of vehicular access**

**Letter of Objection on behalf of [savethedonkeyfield.co.uk](http://savethedonkeyfield.co.uk)**

Cotswold Transport Planning Ltd (CTP) has been instructed by [savethedonkeyfield.co.uk](http://savethedonkeyfield.co.uk) to undertake a transport and highways review of the above planning application (21/00779/FUL) in relation to the proposed construction of eight dwellings and formation of vehicular access on land at Seagrove Farm Road, Seaview, Isle of Wight. The site is known locally as 'The Farmers Field'.

It is acknowledged that the land is listed as an allocated site for housing, together with the adjacent land (Housing Allocation Reference Number HA073 – Land at Seagrove Farm Road & Land off Solent View Road, Seaview) for an indicative yield of 25 dwellings in the Draft Island Planning Strategy Development Plan (November 2018). This follows the site being identified in the 2018 strategic housing land availability assessment (SHLAA) as SHLAA sites IPS125 – Land at Seagrove Farm Road, Seaview (The Farmers Field) and IPS104 - Land off Solent View Road Seaview PO35 (Land to the rear of 51 - 67) (The Donkey Field).

The Site Specific Requirements for Housing Allocation Ref Number HA073 include *“improved and safe access to and through the site for both pedestrians and vehicles”*.

The Draft Island Planning Strategy Development Plan identifies Seaview as a Sustainable Rural Settlement (Policy PSDG 3 – Priority Locations for Development and Growth), which is essentially at the lower end of the hierarchy when considering where new development should be directed, with Primary Settlements, Secondary Settlements, and Rural Service Centres taking priority.

From a transport and highways perspective, any new or intensification in use of a vehicle access should be reviewed and justified as safe and suitable, in accordance with paragraph 108 of the National Planning

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Policy Framework (NPPF). There are a number of matters and concerns in respect of the proposed access arrangements for the site, via Seagrove Manor Road and Seagrove Farm Road, which identify issues of road safety and impact on the local highway, which are expanded upon further below.

## Site Context and Access Arrangements

### Local Highway Network

The local highway network in the vicinity of the site comprises Seagrove Manor Road, Old Seaview Lane and Seaview Lane/Steyne Road, which are all unclassified public highways; Seagrove Farm Road, an unadopted, unsurfaced lane; and Seagrove Manor Close, a private road. Seaview Lane meets the B3330 Nettlestone Hill approximately 550m to the south of its junction with Old Seaview Lane.

An extract from The Island Roads public highway plan showing the extent of public highway for the local highway network in the immediate vicinity of the site, as obtained and provided to CTP by savethedonkeyfield.co.uk, is provided at **Figure 1**.



**Figure 1: Extent of Public Highway Plan Extract [Source: Island Roads]**

Seagrove Manor Road is a residential street approximately 210m in length. It forms the minor arm of a priority junction with Old Seaview Lane at its western extent and provides access to the private road Seagrove Manor Close at its eastern extent. It also provides access Seagrove Farm Road, approximately 150m southeast of its junction with Old Seaview Lane. Seagrove Manor Road has a carriageway width of approximately 4.1 - 4.2m with footways to each side.

Seagrove Manor Road directly serves 21 residential properties, and in turn Seagrove Farm Road serves 6 residential properties as well as the Sports Pavilion and Football Club, and Seagrove Manor Close serves a further 16 residential properties including 1- 6 Seagrove Manor. Thus in total Seagrove Manor Road cumulatively serves in the order of 43 existing dwellings, in addition to the Sports Pavilion and Football Club.

### *Public Rights of Way*

The Public Rights of Way (PROW) network in the wider area includes Public Footpaths and Public Bridleways. An extract from The Island Roads PROW map showing the PROW network in the vicinity of the site, as obtained and provided to CTP by savethedonkeyfield.co.uk, is provided at **Figure 2**.



**Figure 2: Public Rights of Way Map Extract [Source: Island Roads]**

Public Bridleway R67 routes along Seagrove Farm Road from Seagrove Manor Road. At the end of Seagrove Farm Road, it routes generally on a north – south axis between The Farmer’s Field and The Donkey Field towards Solent View Road. Here it follows Solent View Road west and then south along Greenham Drive.

Public Footpath R68 routes south from Old Seaview Lane, approximately midway between its junctions with Seagrove Manor Road and Solent View Road. It continues along the southern boundary of the Football Ground, The Farmers Field and The Donkey Field, routing along the rear of the residential properties fronting Solent View Road, in a generally southeast direction towards Gully Road.

Public Footpath R68 crosses Public Bridleway R67 to the south of The Farmers Field and The Donkey Field, approximately 40m north of Solent View Road. The local highway network in the vicinity of the site comprises Seagrove Manor Road, Old Seaview Lane and Seaview Lane/Steyne Road, which are all unclassified public highways; Seagrove Farm Road, an unadopted, unsurfaced lane; and Seagrove Manor Close, a private road. Seaview Lane meets the B3330 Nettlestone Hill approximately 550m to the south of its junction with Old Seaview Lane.

## Seagrove Manor Road – Suitability to serve additional development

Seagrove Manor Road is a residential street, which cumulatively serves in the order of 43 existing dwellings. Manual for Streets states that “*Carriageway widths should be appropriate for the particular context and uses of the street.*” (MfS, March 2007, 7.2.2). Approval of the planning application for eight dwellings would increase the number of residential dwellings served from Seagrove Manor Road to in excess of 50 dwellings, which typically requires a traditional residential street arrangement with a minimum carriageway width of 4.8m – 5m. Furthermore, Seagrove Manor Road also serves the Sports Pavilion and Football Club, which are accessed from Seagrove Farm Road via Seagrove Manor Road.

The width of the existing carriageway is limited to approximately 4.1m – 4.2m wide. This is generally wide enough to allow two cars to pass on straight sections at slow speed but not wide enough to allow two larger vehicles to pass one another or a car and delivery van or truck, for example. On bends, this limited width means that even two cars cannot pass one another and if two vehicles meet on these sections on the road, it is common place for at least one vehicle to mount the kerb in order to pass. Clearly this is a highway safety issue and the potential for conflicting movements on Seagrove Manor Road would increase with the additional vehicles associated with the proposed development. This in turn would increase the likelihood of vehicles being required to mount the kerb to pass thus increasing the highway safety risk.

The width of the carriageway would need to be increased to a minimum of 4.8m – 5m to allow two cars to comfortably pass one another, although localised widening may still then be required on bends. However, it is clear from The Island Roads highway plan that there is no scope to widen the existing carriageway on Seagrove Manor Road.

Narrow carriageway widths can also encourage pavement parking, where off-street parking is insufficient or not available, which was observed on site. This can impact on residential amenity as well as being a potential highway safety concern with regards to emergency vehicle access.

The existing restricted carriageway width of Seagrove Manor Road, with no scope for improvements, means that the surrounding highway network does not have the capacity in typical highway design terms to accommodate additional residential development.

Consequently safe and suitable access for all users, in accordance with paragraph 108 of the NPPF, cannot be demonstrated.

The additional vehicular trips associated with the proposed development would increase the likelihood of conflicting vehicle movements on the surrounding highway network, thus it is considered that the development would result in an unacceptable impact on highway safety and the residual cumulative impact on the road network would be severe.

## Seagrove Manor Road / Seagrove Farm Road Junction – Limited Space

In addition to the constrained width of Seagrove Manor Road itself, there is limited space at the junction of Seagrove Manor Road and Seagrove Farm Road to allow two-way vehicle movements simultaneously in and out of Seagrove Farm Road. There is also limited space in the vicinity of the junction to allow a vehicle to wait while another vehicle enters or exits the junction.

The Transport Seeds Transport Statement submitted in support of the planning application acknowledges at paragraph 3.2.10 that “... *vehicles cannot pass each other while manoeuvring in and out of Seagrove Farm Road, ... At the Seagrove Manor Road junction with Seagrove Farm Road*”.

The Transport Statement includes proposals to widen Seagrove Farm Road to address the potential conflict and highway safety concerns, suggesting this would allow “*sufficient space for vehicles to wait at the junction and for it to clear before progressing further, as shown on drawing TS6003-TR-1002*”; however there are questions with regards to the land control on Seagrove Farm Road towards its northern end, in the vicinity of the Seagrove Manor Road junction.

With reference to The Island Roads highway plan, there is clearly no scope to widen the existing carriageway on Seagrove Manor Road or provide additional space in the vicinity of the junction bellmouth. Seagrove Farm Road is not public highway; it appears to form part of the Land Registry title IW70448, which also includes The Football Ground, as shown on the Land Registry MapSearch Snapshot plan obtained and provided to CTP by savethedonkeyfield.co.uk.

Furthermore, there appears to be an area of third party land in the vicinity of the Seagrove Manor Road / Seagrove Farm Road junction, including the junction bellmouth, where the Land Registry title red line does not abut the public highway boundary. The public highway boundary on Seagrove Manor Road extends to the rear of the footway on the western side of the junction but does not continue across the junction along this line, reverting to the southern extent of the carriageway in the vicinity of Seagrove Farm Road. To the east of the junction the highway plan suggests that the extent of the public highway here on the southern side of Seagrove Manor Road is the edge of the carriageway. The extent of the Land Registry title IW70448, where it covers Seagrove Farm Road, stops short of the Seagrove Manor Road carriageway.

In summary, there is little, if not any, scope to improve the arrangements at the existing Seagrove Manor Road / Seagrove Farm Road junction. The right of access via Manor Farm Road, over potentially third party land, is questioned in light of the fact that residential development of the site would result in an intensification of the access. The uncertainty is reinforced by the Island Roads response dated 26 November 2020 obtained and provided to CTP by savethedonkeyfield.co.uk, which advised “*We are unable to confirm that the land immediately abuts the property and that there are no areas of land owned by third parties between the land and the public highway. We do not keep records of third party ownership and would advise that you carry out a site visit to see if the property abuts the publicly maintained highway*”.

Regardless of the effectiveness or otherwise of the proposed improvements, at this stage, it has not been demonstrated that the applicant has sufficient control to undertake the works proposed.

Any proposed highway works should be based on a topographical survey, rather than OS mapping, to ensure that the works proposed are deliverable within the public highway and/or land within the applicant's control.

Furthermore, as currently proposed, the works proposed are outside of the application red line boundary and therefore are not considered to form part of the application.

Additionally, there is still the matter of restricted visibility at the junction, which cannot be easily addressed (discussed further below).

### **Seagrove Manor Road / Seagrove Farm Road Junction – Restricted Visibility**

Any new or intensification in use of vehicle accesses should be reviewed and justified as being able to provide visibility splays in accordance with the relevant national guidance (i.e. MfS & Manual for Streets 2 (MfS2), the Design Manual for Roads and Bridges (DMRB)) or local guidance as appropriate.

Visibility at the junction of Seagrove Manor Road with Seagrove Farm Road is severely restricted in both directions by third party land. Seagrove Farm Road is unadopted and the extent of public highway on Seagrove Manor Road is the rear of the footway to the west of the junction (stopping short of the junction itself) and the edge of carriageway to the east of the junction. The visibility to the east (looking right) is hindered further by an existing tree on the corner, which is subject to a Tree Preservation Order (TPO).

Furthermore, the questions raised regarding the land control of the northern section of Seagrove Farm Road only adds to the concern.

The information provided in support of the current planning application does not demonstrate that the proposed access arrangements are safe and suitable, in accordance with paragraph 108 of the NPPF.

The Island Roads' consultation response to the application (dated 28 May 2021) confirms that 2.4m x 25m visibility splays are appropriate for this location in accordance with Manual for Streets. Although, the Transport Seeds drawing shows visibility splays of 2.4m x 25m, these cannot be achieved within the existing public highway boundary, as shown on the Island Roads highway plan, or land within the applicant's control.

It was confirmed by CTP on site that visibility at the junction is severely restricted and in line with the Island Roads consultation response advising that the achievable visibility is actually only 2.4m x 6m to the east (looking right) and 2.4m x 10m to the northwest (looking left), which is not compliant with the required visibility splays.

The Island Roads consultation response goes on to highlight that the extent of the public highway to the east of the junction is the edge of carriageway and therefore the existing achievable visibility would not be improved by any trimming back of the overhanging hedge / vegetation on the southern side of the carriageway. The hedge is in third party

ownership. The response also notes the presence of the very mature tree in this location, which would need to be removed in addition to the hedge in order to deliver the required visibility splays. All of this land is in third party ownership. Furthermore, the tree is subject to a TPO.

To the northwest, the Island Roads response highlights the point identified by CTP on site that although a visibility splay in excess of the 2.4m x 10m measured by Island Roads currently exists in this direction, it crosses third party land and therefore cannot be relied upon. The Island Roads consultation response confirms that there is no planning condition requiring the visibility splay to be maintained in perpetuity.

Safe and suitable access has not been demonstrated, contrary to paragraph 108 of the NPPF. The visibility at the Seagrove Manor Road / Seagrove Farm Road junction is severely restricted and cannot be improved within the extent of existing public highway or land within the control of the applicant. The proposed development is to be served from Manor Farm Road, increasing the number of vehicular and non-motorised trips through the junction. It is considered that the proposed development would exacerbate the existing highway safety issues, increasing the likelihood of conflicting movements at the junction, such that the residual cumulative impacts on the road network would be severe.

### **Seagrove Farm Road – Restricted Width and Lack of Suitable Widening / Passing Places**

Seagrove Farm Road is unadopted and unsurfaced. The lane is single track with the carriageway measuring approximately 3m in width and a verge to both sides, although this is minimal and raised along much of its length.

The Transport Seeds Transport Statement includes proposals to widen the section of Seagrove Farm Road between the Pavilion entrance and the Seagrove Manor Road junction. It is suggested by Transport Seeds that the carriageway can be increased in width here to 4.8m to allow two vehicles to pass; however, on site observations suggest that this is not the case. There appears to be little scope to increase the usable carriageway width here.

This section of Manor Farm Road, between the Pavilion entrance and the junction with Seagrove Manor Road, is approximately 30m in length. There is a small verge on the western side and a verge and mature hedge on the eastern side. Vehicles exiting onto Seagrove Manor Road are currently able to wait in the vicinity of the Pavilion entrance to allow a vehicle travelling southbound on Seagrove Farm Road to pass; however, due to the limited space around the junction of Seagrove Manor Road / Seagrove Farm Road, as highlighted above, a vehicle cannot wait on Seagrove Manor Road in the vicinity of the junction and would need to reverse on the public highway to allow a vehicle to exit.

In addition to the queries regarding the physical constraints on Seagrove Farm Road; as highlighted above, there are also questions with regards to land control in the vicinity of the Seagrove Manor Road junction, which need to be confirmed. At this stage, it has not been demonstrated that the applicant has sufficient control to undertake the works proposed.

It is imperative that any proposed highway works should be based on a topographical survey, rather than OS mapping, to ensure that the works proposed are deliverable within the public highway and/or land within the applicant's control.

Also, as highlighted above, the works as currently proposed are outside of the application red line boundary.

To the south of the Pavilion entrance, there appears to be scope, subject to land control of course, to provide a wider section of carriageway or a passing place(s) to allow two vehicles to pass. On site observations would suggest that this area is already informally used for passing, or potentially car parking associated with the Sports Pavilion or Football Club, as there is evidence of vehicles using the verge on the western side adjacent to the Football Field.

There are a number of mature oak trees along the western side of the carriageway and any proposed works to widen the carriageway would require input from an arboriculturalist in terms of the potential impact on the tree roots here.

Therefore, it has not been demonstrated that safe and suitable access can be achieved in accordance with paragraph 108 of the NPPF. It is considered that the proposed development would result in an unacceptable impact on highway safety and the residual cumulative impact on the road network would be severe. The proposals are therefore contrary to paragraph 109 of the NPPF.

### **Impact on the Public Bridleway**

It is important that the implications that any development may have for the existing PROW network are fully considered. The proposed residential development served from Manor Farm Road would result in additional vehicular trips on the existing Public Bridleway R67, which routes along Seagrove Farm Road from Seagrove Manor Road.

The Transport Seeds Transport Statement appears to acknowledge some concern regarding increased vehicular movements on Manor Farm Road as a result of the proposed development and the resultant increased conflict between motorised and non-motorised users on the Public Bridleway R67.

The Transport Statement states that as part of the access strategy, pedestrian and cyclist movements to/from the site would be focused towards the PROW network, to Public Bridleway R67 to the east and south of the site to Solent View Road, to avoid using Seagrove Farm Road and Seagrove Manor Road. The Transport Statement states that the strategy is to avoid conflict between motorised and non-motorised users, stating: *"The potential for a significant increase in conflict between existing and future motorised and non-motorised users is therefore limited"* and *"provision has been made for these to avoid using Seagrove Farm Road and Seagrove Manor Road in preference of the existing network east and south of the site."*

Although the proposed strategy refers to both pedestrian and cyclists, it is noted that the layout only includes a footpath link to the existing Public Bridleway R67 to the east of the site, rather than a shared footpath /

cyclepath, thus effectively preventing cyclists from accessing the PROW network at this point.

Notwithstanding the proposed access strategy, as pedestrians and cyclists would not be restricted from using the existing Public Bridleway R67 via Manor Farm Road, it is clear that pedestrians and cyclists from the development would still use this route. Therefore, the proposed development would result in an increase in non-motorised users as well as an increase in vehicle trips, thus increasing the risk of conflict between motorised and non-motorised users on Public Bridleway R67 generally.

Moreover, the increased vehicle trips as a result of the proposed development would have a direct and significant impact on existing non-motorised users of Public Bridleway R67, regardless of the proposed access strategy for the proposed development.

Of particular concern is the section of the Public Bridleway between the Pavillion entrance and Seagrove Manor Road, where Manor Farm Road is of limited width over a distance of approximately 30m. The small verge does not provide sufficient refuge for pedestrians, cyclists or horseriders in the event that they meet a vehicle on this section. Clearly the proposed development would result in an increased risk of conflict, which is a highway safety concern.

### Summary

Cotswold Transport Planning Ltd has undertaken a transport and highways review of planning application (21/00779/FUL) for the proposed construction of eight dwellings and formation of vehicular access on Land at Seagrove Farm Road Seaview Isle of Wight (known locally as The Farmers Field).

From a transport and highways perspective, there are a number of matters and concerns in respect of the proposed access arrangements for the site, and there are fundamental issues that have not been considered or addressed fully by the application relating to highway safety and impact on the local road network.

It is considered that safe and suitable access has not been demonstrated in accordance with paragraph 108 of the NPPF and, with reference to paragraph 109 of the NPPF, the proposed development would result in an unacceptable impact on highway safety, and the residual cumulative impacts on the road network would be severe, thus the application should be refused on highways grounds.

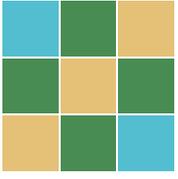
Taking all of this into consideration, CTP concludes that the current application (21/00779/FUL) is not acceptable in transport and highways terms and planning permission should not be granted.

Yours Sincerely

Elisabeth Spencer

*Associate Director*

**Cotswold** Transport Planning Ltd



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## Appendix C

# Technical Note

Project: TS6003 – Seagrove Farm, Nettlestone & Seaview  
 Planning Ref 21/00779/FUL  
 Subject: TN01 – Response to Island Roads’ Recommendation for Refusal  
 Prepared by: Valérie Ballorin  
 Date: 22 July 2021

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## 1 Introduction

- 1.1 A planning application for 8 residential units on land known as Seagrove Farm in Nettlestone & Seaview was submitted in May 2021 and a Transport Statement report was prepared by this office and issued in support of this application. As part of the statutory consultation, Island Roads responded to the proposal on 28<sup>th</sup> May 2021 with recommendation for refusal on the basis of four main criteria; inadequate access visibility, inadequate access width, generation of traffic onto public highway and parking provision.
- 1.2 This Note has been produced in response to the above issues raised.

## 2 Inadequate Access Visibility

- 2.1 Island Roads has raised concerns over inadequate visibility provision at the Seagrove Manor Road/ Seagrove Farm Road junction and at the Old Seaview Lane/ Steyne Road junction.
- 2.2 Taking the latter first, it should be noted that this junction is part of the adopted highway and that Steyne Road and Old Seaview Road provide the main routes to Seaview, with Old Seaview Road signposted at the junction as the main route to the shops, car park and centre of Seaview. While there are seasonal variations, the roads carry relatively low levels of traffic however and both corridors are also bus routes.
- 2.3 Furthermore, accident records over the last 22 years (since 1999) show that there has been no accident resulting in casualties at the junction, as illustrated on Figure 1, and that of the two accidents that have been recorded on the local highway, neither occurred at any of the local junctions. One was recorded in 2001 and the other in 2010.

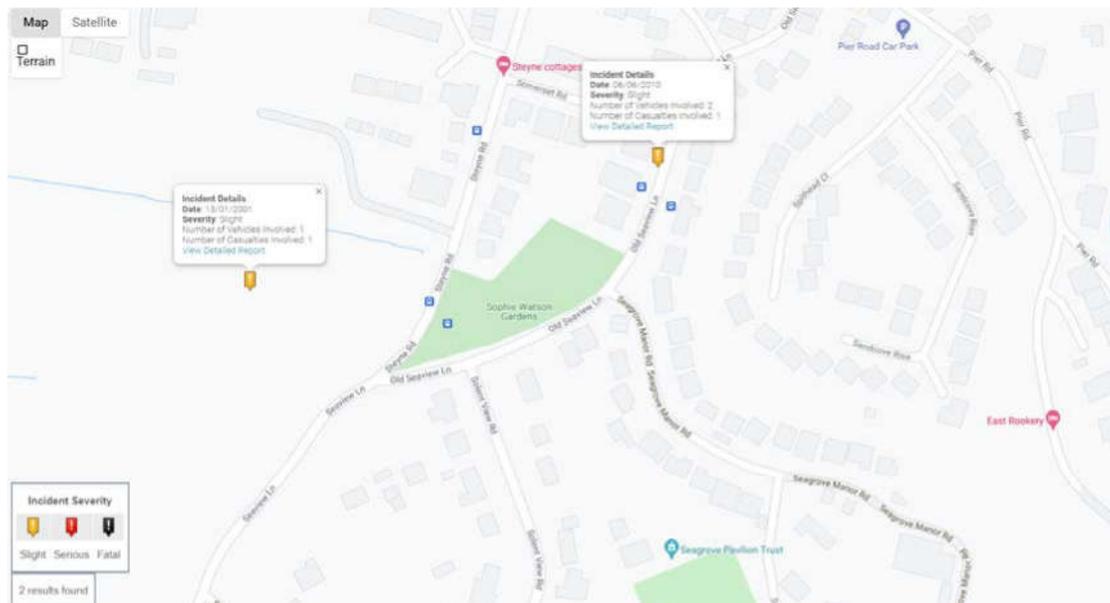


Figure 1 - Extract from CrahsMap (1999 to 2020)

2.4 Despite this, Island Roads states that the visibility to the south-west from Old Seaview Road is only 33m, a shortfall of 43m for a road subject to the 30mph speed limit. Drawing TS6003-HW-1001 submitted with the Transport Statement shows that the 43m visibility can actually be accommodated when measured with Island Roads’ recommended 1m offset from the edge of the footway kerb. The visibility splay in question affects visibility of vehicles approaching from the left, which would be travelling on the opposite lane. Given that the junction is signposted clearly and that a large number of these vehicles would be slowing down to turn right into Old Seaview Lane, it is unlikely that any would undertake overtaking manoeuvres. Approaching vehicles from this direction would be able to see the Old Seaview Lane junction from a distance of 53m, as illustrated on Figure 2, and in turn would therefore be able to see any traffic in the process of turning right out of Old Seaview Lane junction and reduce speed accordingly.



Figure 2 – Visibility of vehicles approaching Old Seaview Lane from the south-west



- 2.5 Speeds of approaching vehicles along Steyne Road are therefore likely to be well within the 30mph limit at this point and the drive behaviour detailed above is reflected by the lack of accidents over the last 20+ years.
- 2.6 Similarly, Island Roads raised concerns over the sub-standard visibility in the northbound direction at the Seagrove Farm Road junction with Seagrove Manor Road. As detailed in paras 3.2.4 to 3.2.7 of the Transport Statement, the local constraints along Seagrove Manor Road, lack of accident records and the limited number of properties served by Seagrove Manor Road to the right of the access, combine to ensure that the available visibility has not given rise to any safety concerns in the past 20+ years. This is despite Seagrove Farm Road carrying traffic to the Pavilion particularly during football matches which would be greater than the additional traffic generation from the proposed residential development. It therefore remains our position that the proposal will not give rise to an increase in the risk of accidents at the junction.

### 3 Inadequate Access Width

- 3.1 This concern from Island Roads relates to the narrow effective widths of both Seagrove Farm Road and Seagrove Manor Road. These issues and the impact of the proposed development have been addressed in paras 3.2.9 and 3.2.10 and Section 3.5 of the Transport Statement and it is a matter of opinion whether the existing reduction in effective width as a result of on-street parking along Seagrove Manor Road represents a material safety issue, especially as Island Roads has acknowledged that this acts as a traffic speed reduction feature in any event.
- 3.2 It is also not unusual in urban areas, for the capacity of residential roads to be reduced by on-street parking and other constraints and this is generally not deemed a material issue when the road/streets are not part of through routes, which is the case here. The additional traffic from 8 new properties is not likely to significantly affect the current situation, especially when considered in the context of the 32 residential properties fronting Seagrove Manor Road/ Seagrove Manor Close and of the 10 existing residential properties along Seagrove Farm Road.
- 3.3 Furthermore, proposals to improve and enhance Seagrove Farm Road have been submitted as shown on Drawing TS6003-HW-1001, which will benefit both existing and future users of the corridor and specifically non-motorised users. The enhancements will also provide improved access for emergency and refuse vehicles which currently cannot turn around at the end of Seagrove Farm Road but which will be able to do so from the proposed new residential access road in future.

### 4 Traffic Generation onto Public Highway

- 4.1 Island Roads has raised concerns that *“the proposed development would generate a significant increase in vehicular traffic entering and leaving the public highway (Seagrove Manor Road/Seagrove Manor Road J/w Old Seaview Lane/Old Seaview Lane j/w Steyne Road) which is limited in width to the detriment of highway safety and would add unduly to the hazards of highway users”*.



- 4.2 Table 3.1 of the Transport Statement provides an estimate of traffic generation from the proposed development of 8 dwellings and concluded that this would generate up to 4 two-way movements per hour during the peak period of activity (i.e. during the morning and evening peaks). Daily, this would represent up to 30 two-way movements. The Ts also commented that this increase would be in addition to the existing 50 two-way daily movements from the existing properties served by Seagrove Farm Road and the 79 movements from the properties served by Seagrove manor Road/Close if the same trip rates were applied. It would also be in addition to traffic generated by the Pavilion activities including during football matches, which would be concentrated over shorter periods of times.
- 4.3 In the past, Island Roads has recommended that a 5% increase would lead to unacceptable levels of highway safety. However, this is arbitrary and does not take account of existing background levels of traffic or local constraints. The lack of accidents records over the last 20+ years in particular would suggest that the network is not operating at capacity or to such an extent that any additional traffic however limited would increase the potential of risk to existing road users.
- 4.4 On the other hand, guidance from the Institute of Environmental Management and Assessment (IEMA)<sup>1</sup>, which is used across the industry to assess the environmental impacts of road traffic including on accidents and road safety considers the following criteria to determine the scope of the environmental assessment of traffic impacts from a development:
- “include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%); and
  - Include any other specifically sensitive areas where traffic flows have increased by 10% or more”
- 4.5 The basis of the above thresholds is based on evidence that increases of less than 10% have a negligible impact as daily variance in traffic flows can be of equal magnitude. The 30% threshold on the other hand relates to the level at which humans may perceive change and there may therefore be an effect as a result. Changes in traffic flows at and over this level do not however suggest that the effect is significant but that further consideration is required. Para 3.1.4 of the TS states that the daily traffic increase from the development has been estimated at 23% of what is currently experienced on Seagrove Manor Road. This is less than the 30% threshold from EIMA. This proportional level is also due to the low level of traffic already on the road network with the actual number (30 two-way movements) not considered to be significant particularly when spread over the day.

## 5 Parking Provision

- 5.1 Island Roads considers that the proposal do not provide adequate parking in line with the SPD based on the current layout for Plot 2 only showing adequate space for one vehicle rather than the prescribed two. Island Roads however does acknowledge that there is space

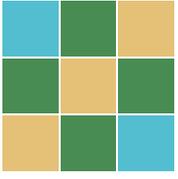
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<sup>1</sup> Institute of Environmental Management and Assessment (IEMA) *Guidelines for the Environmental Assessment of Road Traffic*



for the driveway to be widened to include a second space. The layout could therefore easily be modified to address this reason for refusal and could be subject to an appropriate planning condition.

End.



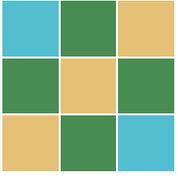
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## Appendix D

Publicly Maintainable Carriageway
  Publicly Maintainable Footway
  Publicly Maintainable Verge (Dark Orange)
  Covered by a Highway Adoption Agreement



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## Appendix E



- Notes:
1. Ordnance Survey, (c) Crown Copyright 2020. All rights reserved. Licence number 100022432.
  2. Do not scale from this drawing work from figured dimensions only.
  3. All dimensions are shown in metres unless noted otherwise.
  4. Highway boundary information has been provided by Island Road (Isle of Wight Council) and has been overlaid by Cotswold Transport Planning onto the topographical survey on a best fit basis. CTP accepts no liability for the accuracy of the data provided and the highway boundary information shown is subject to checks by a licensed conveyancer.

- KEY:
- Publicly Maintainable Carriageway  
(Transcribed Highway Boundary based on Isle of Wight Council)
  - Publicly Maintainable Footway  
(Transcribed Footway Boundary based on Isle of Wight Council)
  - Visibility Splay 2.4m X 43m (30mph) (1m offset from the kerb)  
Visibility Splays are based upon MfS standards

Rev	Date	Details	Drawn by	Checked by



CLIENT:  
**Savethedonkeyfield.co.uk**

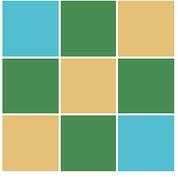
PROJECT:  
**The Farmers Field**

TITLE:  
**Visibility Assessment**

STATUS:  
**INFORMATION**

SCALE @ A3: 1 : 500	DATE: 14.10.2021	DRAWN: FA	CHECKED: JS	APPROVED: ES
JOB NO: 21-0258	DRAWING NO: SK01	REVISION: -		





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