

## Technical Note 01A

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**Project:** Test Valley Borough Council Planning Application 26/00796/FULLS:  
Land at Pucknall Farm, Dores Lane, Braishfield, Romsey

**Subject:** Transport Impact and Sustainability Review

**Client:** Braishfield Parish Council

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### Introduction

1. This Technical Note considers transport and sustainability matters with regard to a planning application for the demolition of existing agricultural structures and their replacement with 6 bungalows on land at Pucknall Farm, Dores Lane, Braishfield, Romsey (Test Valley Borough Council (TVBC) planning application ref. 26/00796/FULLS).
2. One of the buildings proposed to be demolished is a barn with prior approval for conversion to 6 dwellings (TVBC planning application 25/02989/PDQS). It is noted that no assessment was made of the transport impact of the proposed conversion.
3. Bruce Bamber is Director of Railton TPC Ltd and has worked for over 35 years in the transport planning industry. He has dealt with the transport and access arrangements for a wide range of development types from local to strategic scale and has been involved with numerous transport studies for public and private sector clients. He has given evidence at informal hearings and public inquiries, participated in Local Plan Inquiries and at a DCO Hearing. He is a Member of the Chartered Institution of Highways and Transportation.
4. The following sections consider the transport impact of the proposed development and its sustainable transport credentials.

### Sustainable Access

5. The proposed site is in an isolated location with the closest facilities within Braishfield village that is, via the proposed access, around 2.5km away along a narrow, unlit country lane with no footways. The nearest bus stops are in the village, over 2.5km from the site. The facilities within the village are themselves limited to a primary school, two pubs, a limited-offering volunteer-run shop, a recreation ground and a village hall.
6. The following table provides an indication of the mode of travel used by existing residents in the local area:

**Table 1: Census Mode of Travel to Work (2011)**

| Mode          | %             |
|---------------|---------------|
| On foot       | 9.7%          |
| By bicycle    | 2.1%          |
| Bus           | 0.0%          |
| Train         | 6.2%          |
| Car driver    | 79.9%         |
| Car passenger | 1.4%          |
| Motorcycle    | 0.7%          |
| <b>Total</b>  | <b>100.0%</b> |

**Source:** Nomis database area E00117659

7. A car driver mode share of 79.9% is extremely high. It should be noted that of the 9.7% who walk to work, the vast majority are likely to be in the village of Ampfield (5.4km away) that lies within the same Census area and has a range of facilities and some employment. All of those travelling by train will have had to travel using another mode to reach the railway station. The majority of these are also likely to be car trips.
8. It is therefore evident that the proposed development suffers from extremely poor levels of sustainable access. In this respect the location is not compliant with Paragraph 110 of the National Planning Policy Framework:

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

9. It is clear from the assessment of opportunities for residents within the proposed development to travel by sustainable modes that the need to travel is not **limited** and there is not a genuine choice of transport modes available for the vast majority of trips.
10. The latter part of Paragraph 110 recognises that opportunities to maximise sustainable transport vary between urban and rural areas. This is true and focuses attention on the key issue which is that this is an inappropriate location to develop a significant number of new dwellings. The consequence would be to produce a development

almost entirely dependent on the private car. It is therefore considered that the proposals are not in accordance with Paragraph 110 of the NPPF.

11. Paragraph 115 of the NPPF would also be relevant to this proposal:

*'115. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

***a. sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;***

***b. safe and suitable access to the site can be achieved for all users;***

*c. the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code<sup>48</sup>; and*

*d. any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach'. (emphasis added)*

12. It is clear that sustainable modes are not prioritised. It is also clear that there is no sustainable transport vision for the site, as already explained, and that the scale and type of development in this location is inappropriate in terms of sustainable transport. The proposed development does not, therefore comply with Paragraph 115 of the NPPF.
13. A further problem is that **safe and suitable access** to the site cannot be achieved for all users. The absence of local facilities means that suitable access to many amenities beyond the village would not be available for anyone without access to a private car. Even if a person is able to walk the significant distance to the nearest local facilities, they would have to do so along the carriageway of the narrow Dores Lane. As already stated, there are no footways and in places there are no verges with steep embankments supporting hedgerows tight up against the edge of the carriageway providing little opportunity for pedestrians to move out of the path of oncoming vehicles. The width of the lane (less than 3.5m in places) is insufficient to allow a vehicle to safely pass a pedestrian who is forced to stand within the carriageway.
14. The lane has numerous tight bends with very restricted forward visibility, blocked by the hedgerows along the carriageway edges. In places drivers and pedestrians have extremely limited inter-visibility. There is a risk that drivers would meet pedestrians unexpectedly and have insufficient distance to safely stop or slow to a safe passing speed.
15. The lane is unlit and would therefore be even more dangerous in the dark.
16. Paragraph 117 of the NPPF provides further policy guidance on new development:

'117. Within this context, applications for development should:

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

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

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

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

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

17. For anyone with mobility impairments facilities and bus services would be entirely inaccessible except by car. The proposed development would not comply with Paragraph 117.

18. The risks associated with pedestrians using the narrow lane raise highway safety concerns that are relevant to Paragraph 116 of the NPPF:

*'116. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios'.*

19. Given the absence of any safe walking route to local facilities, Paragraph 116 of the NPPF would suggest that the proposed development should be refused on highways grounds. If it is assumed that no-one will walk to and from the proposed development then Paragraphs 115 and 117 suggest that the proposal is not acceptable.

20. The inaccessible location of the proposed development also makes it contrary to Policy T1 of the Adopted Test Valley Local Plan 2011-2029:

**'Policy T1: Managing Movement**

*Development will be permitted provided that:*

**a) its location is connected with existing and proposed pedestrian, cycle and public transport links to key destinations and networks; and**

**b) measures are in place to minimise its impact on the highway and rights of way network and pedestrian, cycle or public transport users; and**

**c) the internal layout, access and highway network is safe, attractive, in character, functional and accessible for all users and does not discourage existing and proposed users; and**

*d) it does not have an adverse impact on the function, safety and character of and accessibility to the local or strategic highway network or rights of way network; and*

*e) Provision is made to support and promote the use of sustainable transport, including the submission of a site travel plan where appropriate.'* (**emphasis added**)

21. The proposed development is not connected to the existing pedestrian and public transport networks and pedestrian access is not safe, accessible to all users and discourages users.
22. On the basis of the above it is concluded that the proposed development is contrary to both national and local policy with regard to sustainable access (and highway safety).

### **Trip Generation**

23. The Design and Access Statement (DAS) (New Forest National Park Building Ltd, April 2026) states:

*'The proposed residential development of six bungalows will generate materially lower and more predictable daily traffic movements. There would be a dramatic fall in horse boxes and lorries at the site, which would be of benefit to locals and the highways usages.'* (DAS, Section 9)

24. The DAS fails to provide any justification for this statement. No evidence is provided regarding typical levels of existing vehicle movement. Types of vehicles are listed (large goods vehicles, horse transporters, feed deliveries, service vehicles) but no information is provided that could be used to assess typical daily vehicle movements. Most of these vehicle types would make only occasional visits (one or two visits per week).
25. A single dwelling in an urban area typically generates around 6 car trips per day. A dwelling in a location such as this is likely to generate significantly more than 6 car trips per day because a negligible number of trips would be undertaken on foot or by bicycle. Six bungalows are likely to generate over 40 car movements per day. In addition there would be delivery vehicles and service vehicles. Given the remoteness of the site, it is likely that the reliance on delivery vehicles would be higher than in other areas where retail and other facilities are accessible on foot.
26. It appears highly unlikely that the proposed development would generate '*materially lower and more predictable daily traffic movements*'. It is considered that, on the contrary, the proposed six dwellings would generate significantly more vehicle movements than the existing uses on the site.

27. The applicant suggests, '*Given the reduced operational intensity compared to the lawful use, there can be no sustainable highway reason for refusal under NPPF paragraph 115 (Highway Safety)*'. It follows from this argument that the **increased** 'operational intensity' that would be associated with the proposed development **would** be a highway reason for refusal under NPPF paragraph 115. It appears that the author of the DAS is referring to the December 2023 version of the NPPF since the highway safety reason for refusal forms part of Paragraph 116 of the version of the NPPF that has been current since December 2024 (see above).
28. Dores Lane is of insufficient width over most of its length to allow two light vehicle to pass. Drivers currently use property access points and informal passing places when meeting oncoming vehicles. There is evidence of wheel damage to narrow verges and embankments. The standard of the lane is well below what would be expected for a development access road. An increase in vehicular use will lead to increased instances of vehicles meeting on narrow sections of the lane. This will lead to a higher frequency of drivers being forced to reverse to reach a point where there is sufficient width to allow passing. This presents a highway safety concern both for drivers of vehicles and for any vulnerable highway users (pedestrians, cyclists and equestrians) who would be using the lane.
29. It is stated in the DAS that, '*Highway [sic] did not object to the Fall back use of the site*' (p.15). There is no evidence that the Highway Authority was consulted when prior approval was granted for the conversion of a barn to six dwellings under the Town and Country (General Permitted Development) (England) Order 2015. The Highway Authority's views on the matters of sustainable access and the net increase in trip generation of the site have yet to be provided.

### **Conclusion**

30. The proposed development is in an isolated location. The closest facilities are in Braishfield that is over 2.5km from the site. Few people would walk this distance but for those who might, there is no safe route for them to take. Dores Lane has no footways, limited verges and sections with steep embankments situated very close to the carriageway edge. There are tight bends that limit forward visibility for drivers and the lane is unlit.
31. The closest bus stops are in Braishfield and cannot be accessed safely on foot.

32. The low level of sustainable access and the risks presented to pedestrians leads to the conclusion that the proposals are contrary to Paragraphs 110, 115, 116 and 117 of the NPPF and Local Plan Policy T1.
33. The applicant suggests that the proposed development would generate less traffic than the permitted uses on the site. The applicant presents no evidence for this statement.
34. The proposed development is likely to generate in excess of 40 car movements per day in addition to delivery and service vehicle movements. This level of trip generation is highly likely to be greater than that associated with permitted development on the site.
35. The applicant suggests that the Highway Authority did not object to the permitted conversion of a barn to six dwellings on the site. There is, however, there is no evidence that the Highway Authority was consulted on this application that was approved under the General Permitted Development Order 2015.
36. Overall it is concluded that the proposed development is not acceptable for transport sustainability and highway safety reasons.