

Mr S Harvey
Newington Parish Council
23 August 2022

Dear Mr. Harvey,

**21/504028: Proposed Development of 25 Dwellings at Land at School Lane,
Newington: ADDENDUM**

Further to my letter dated 06 August 2022 setting out an objection to the above proposed development on transport grounds I am writing with regard to further submissions made by the applicant. My letter dated 06 August did not appear on the planning portal until 17 August 2022. The Environmental Protection Team have provided comments dated 25 July that are in response to the DHA Air Quality Letter dated 05 July and DHA Transport Technical Note dated July 2022. These two documents appear on the Planning Portal as posted on 12 July 2022. However it is important to note that they were only available to public view on 19 August following questions raised by Newington Parish Council. I did not, therefore have an opportunity to review the information as part of my previous letter.

The following, updated comments, refer to the '12 July' documents, previously unseen, and the Environmental Protection Team response to these.

I have reviewed the DHA Technical Note dated July 2022 and find nothing within it that would suggest to me that the measures proposed will lead to the suggested 10% reduction in car travel.

The Technical Note references the NatCen report, 'Impact of interventions encouraging a switch from cars to more sustainable modes of transport' and quotes a paragraph taken from the Executive Summary that states, '[public transport] *should also compare favourably to the cost and convenience of driving*'. As I have already set out in my previous letter, the site is at least 850m from the nearest bus stop. It is absurd to suggest that bus use could ever compare favourably with car use at the proposed development. Although the train station is closer, train services are expensive compared with driving, and by their nature are not convenient for the vast majority of journeys owing to the limited destinations accessed and the infrequency of services.

The use of the report to imply that a significant shift to bicycle use is also disingenuous since it entirely ignores the first point raised in the report which is that, '*Successful interventions to encourage a switch from cycling include separating cycle routes from other vehicles...*'. There are no designated cycle facilities separating cyclists from other vehicles in the area. Indeed, the A2 is a very hostile environment for cyclists. Again, it is absurd to attempt, as DHA does, to compare the Newington site with Brighton that has well

established cycle routes and a comprehensive range of supporting measures to promote and encourage sustainable travel.

The Technical Note also refers to the TRL report, 'Sustainable travel towns: An Evaluation of the longer term impacts' (Cairns and Jones, 2016). Put simply, the findings of the TRL report have no relevance to the Newington site since Newington is not a sustainable travel town. Indeed, the fact that the average reduction in car trips of 7%-10% has been achieved in locations where there has been a committed, long-term and comprehensive development of a wide range of measures and initiatives promoting sustainable travel strongly suggests that the scope for achieving any measurable change in travel behaviour at the proposed site is negligible since bus services are inaccessible, local services accessible on foot are limited and cycle use is both unattractive and hazardous.

I conclude that the Technical Note has no credibility and its conclusions should not be used as a basis for any rational decision-making.

I trust the above is clear. Please do not hesitate to contact me if you have any queries.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "BRBamber", with a long horizontal flourish extending to the right.

Bruce Bamber BSc MA MSc MCIHT, Director