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Date	17 March 2025	Email	havantdc@hants.gov.uk

For attention of Ms Wells

Dear Sirs

Re: APP/24/00968 At Beachlands, 5 Sea Front, Hayling Island

Full planning application for the development of 4 no. commercial units (E Use) and 32 no. residential units (C3 Use) over 4 floors with associated open space, public realm enhancements, demolition of the existing Beachlands Amusement Arcade Buildings and dwelling and associated works

Thank you for your consultation on the above planning application. The development proposals are understood to be for 4 no. commercial units under use class E (1255.2sqm with a net increase of 350 sqm) and 32 residential units (16 two bed and 16 three bed flats) and associated works. The Highway Authority wish to make the following comments.

Policy Status

The site is adopted in the adopted Havant Local Plan ref HY45. It is considered that given the scale of the development, its overall gross floor space increase and the adopted local plan status that this site sits outside the current cumulative harm considerations of other speculative applications within the Hayling Island area. Consideration of this site within any Paramics work would have been accounted for within baseline assumptions and therefore additional modelling work is not considered to be required and it would not be reasonable to hold this development until the completion of any assessment work on the summertime impacts.

Deputy Chief Executive and Director of Hampshire 2050
Gary Westbrook

Site Location

The site is located south of the Sea Front from the roundabout with Beach Road. It is currently occupied by an amusement arcade, car park and area of beach (also used for car parking). The area also accommodates a car boot sale every week. The proposed development is to redevelop the area removing these existing uses and replacing them for the consented development proposals.

Sustainable Access

Walking and Cycling:

The Transport Statement sets out a basic review of the walking and cycling infrastructure. A more detailed review should be undertaken to identify and limitations of the existing infrastructure provision.

For walking whilst there are footways present in the vicinity of the site, these are narrow in places and crossing provision is poor. The area gives priority to vehicular traffic and given the intended use of the site these areas should be improved to place pedestrians and cyclists first. The scope of the assessment work should encompass the highway up to the Beach Road roundabout to ensure appropriate access to a level of service that supports the intended use can be secured.

The Transport Statement for cycling simply refers to the NCN route proximity to the site. The applicant should review the LCWIP for Havant which identifies improvements between the Hayling Billy Trail and the seafront which are relevant to this site's considerations. This includes improvements to Staunton Avenue junction with Sinah Lane, Staunton Avenue/Sea Front Road junction and to Sea Front itself in regard to connecting the cycle route to this proposed development to enable an improved level of service for cyclists.

There is currently some shared use provision on the main Sea Front east/west alignment at the site which ties with a parallel crossing. The connection is limited however and terminates at the Beach Road roundabout. This should be enhanced and extended into the site. As identified in the Transport Statement the road width is wide at this point and above the requirements of Hampshire's TG1 and 2 guidance. There would be scope to reduce the carriageway width to cater for improved cycle access in this area and directly to the site.

Buses:

There is existing bus stop provision within the immediate site frontage. As set out above access to the bus stop is constrained by the existing layout. The shelter provision could also be updated to encourage more bus use. It is noted however that this infrastructure sits outside the adopted highway and the redline area of the applicant.

Rail:

The nearest rail station to the site is in Havant. The Transport Statement suggests that this is within a cyclable distance from the site. However, it is considered that given the distance (5.8 miles) this would not be an attractive option for all users.

Personal Injury Accidents (PIA)

PIA data has been obtained from Hampshire Constabulary for a 5 period from January 2019 to January 2024. There is a total of 5 slight and 1 series accident within the search area with 4 occurring at the Beach Road Roundabout. No accident data has been provided within the Transport Statement and this should be shared with the Highway Authority to conclude whether the identified cluster or series injury accident have any bearing on the considerations of this application. The data itself is over a year out of date and the most recent data should be obtained from Hampshire Constabulary.

Site Access

The existing access to the site is from a gated informal bellmouth arrangement which makes up part of the adopted highway. This bellmouth lands onto the Seafront roundabout in a nonstandard arrangement.

The application proposes to construct a new vehicle access to the site providing access to the Sea Front from the northwest corner of the site. This would be made up of a 5.5m wide vehicle crossover. This would provide ingress only with vehicles exiting the site via the adjacent car park. No details access proposals are shown and these should be provided. Drawing 2024-6686-001 shows an overview of the site with carriageway dimensions. These are however unclear at the scale and detail of the drawing on where measurements are being taken. For example, alongside the proposed building the width is annotated to vary from 30m to 10m wide with no clear change in the width on the drawing itself. There are no details of the access arrangement into the private car park or any information about how the existing access within the highway would be closed off. Appropriately detailed site access and highway works plans should be provided to support an application requiring access amendments. This should include visibility splays from the proposed access points in accordance with Hampshire County Councils TG3.

Servicing

The site would be serviced by delivery vehicles and all servicing vehicles from the western side of the site. Vehicles would arrive via the new vehicle access and depart via the existing car park arrangement. Tracking speeds for all vehicles should be provided in accordance with Hampshire County Councils Technical Guidance Notes 1 and 2.

Tracking for 7.5t Box Van has been provided on drawing 2024-6698-002 which can undertake the required movements within the carriageway.

Refuse collection would be undertaken from bin stores situated on the western side of the building and tracking for the refuse vehicle has been shown on drawing 2024-6686-004. This shows that the proposed vehicle crossover will be insufficient in width to accommodate the vehicle. It also shows the vehicle required to overhang the traffic island which is subject to a number of vertical features which would prevent such movements.

Swept path analysis has also been provided for the fire tender on drawing 2024-6686-003. This shows tracking for the incorrect sized vehicle and this should be revised to accord with the requirements of TG1 and 2.

The servicing arrangements are reliant on the use of a private car park area which is made of an unbound service. This is not considered to be appropriate and access design should suitably accommodate vehicles access onto and off of the highway via land within the application boundary.

Parking Provision

The site is not proposing to provide parking within its redline. It is instead reliant on the existing public parking areas within the vicinity of the site. Given that these cannot be secured in perpetuity the development must be considered a car free site. The Highway Authority do not consider that the site is suitably located for car free residential development. Havant Borough Council as the Parking Authority should confirm whether they support the proposed parking strategy for the site and whether parking provision for the site can be accommodated in perpetuity.

Cycle parking is proposed with 83 long stay and 32 short stay spaced. Parking required for employees and residents would be provided within the ground floor stores. Visitor parking is proposed via the provision of Sheffield Stands within the site. The Highway Authority recommend that this is provided as covered parking and the proposed location of such parking provision should be confirmed. Again, Havant Borough Council as the Parking Authority should confirm that quantum of parking meets the required parking standards.

Given the proposed car free nature of the development cycle parking for users would be a core requirement to enable travel beyond the immediate area.

Trip Generation

The date range for the TRICs assessment work that has been carried out seems to apply a reduced search area in terms of regions which is unjustified. They have also included data from 2010 within the search range. A more appropriate search timeframe would be from 2019 and excluded data collected during the Covid restrictions.

Existing Trip Rates

The TRICs database has been analysed by the applicant for the existing and proposed uses. This has considered both weekday and weekend trips.

Weekend peak hours have been assumed to be the standard weekday peak hours 8-9 and 5-6 however when considering the weekend peak these should be based on the Saturday peak hour as informed by local survey data. This has been applied across the board for all uses and should be amended to inform the weekend peak assumptions.

A playcentre has been used as a proxy for the amusement arcade and the Highway Authority are minded to agree that this is likely to be a robust assumption. However, no assessment has been undertaken for trips generated across the day during the week and this is not an accepted position. Reference is made to a 60% reduction in the trip rate being applied due to the likely linked trips. Evidence for this assumption has not been provided.

TRICs data has been utilised for the car boot sale trip generation. Survey data is only from a weekend within the database so the applicant has applied a 50% reduction to the trip generation assumptions due to the conclusion that a weekday sale would generate less business. This is not agreed as it is not backed up with any evidence base.

It is unclear why surveys cannot be obtained for the existing uses to inform the base scenario.

Proposed Trip Rates

The use of the full breadth of the generic E Class uses makes determining appropriate trip rates for the commercial units difficult. An assumption has been made that the commercial units would be 2 retail and 2 café units. The class uses sought within the E Class planning category are not being constrained within the consent and therefore the Highway Authority question whether this represents a robust assessment regarding the potential trip generation and likely movements for larger vehicles. The applicant should consider whether given the location proposals to reduce the scope of E Class uses would be more appropriate. Sensitivity testing will be required in the absence of a reduced scope.

For the retail trip rates local shop assumptions have been utilised, and a 60% reduction has been applied to the rate on a linked trip assumption. Again, however this has not been evidenced. Survey searches in TRICs have been constrained to Monday and Wednesday reducing the number of returned sites, two of which are surveys from 2011 which may not represent current trip patterns. The Highway Authority have rerun the TRICs with the above-mentioned date range and returned 5 sites and this is returning a much higher trip rate. The applicant should further review the trip generation data and provide justification for the appropriateness of the data and the assumed reductions.

The café trip rates assumptions have been based on a restaurant which the applicant determines to be more robust as a restaurant would generate higher trip numbers. This is not agreed, and they would be considered comparable across the day. TRICs does offer surveys for a café use but surveys are

limited and in town centre locations. Again a 60% assumption has been applied based on a linked trip assumption which should be justified. Using the aforementioned date range not constraining the weekdays chosen or the study area within England trips rates are broadly in line with those presented. Given the limitations of the TRICs data local surveys may be beneficial to demonstrate the forecast trip rate for this use type.

For the flats a privately owned flat trip rate assumption has been used which is agreed appropriate. A 23% reduction factor has been applied to the weekend trip rate assumptions based on Nation Travel Survey data assumptions. It is unclear where in the Nation Travel Survey this assumption has been obtained, this should be clarified. Given the location of the site, it would be reasonable to assume daily trips are maintained without such a reduction.

Summary

A total trip generation assumption have been presented in table 4.12 of the Transport Statement with the net results shown in table 4.13. Given the Highway Authority are questioning assumptions in relation to this trip generation these are not agreed. Overall, however even with what are considered to be overly generous reductions in the trip forecasting the development would result in a net increase of trips across all days with only a minor reduction in the AM peak hour trips on a Wednesday.

The trip data presented also only accounts for vehicle trips and not trips by all modes. Given the requirements of LTP4 and NPPF a multimodal trip rate should be provided.

The Highway Authority have insufficient information to agree the trip rate assumptions presented. The additional information should be provided to agree the trip assumptions.

Traffic Distribution/Assignment

Given the peak hour assumed trip rates no assessment work has been undertaken on how trips land on the network. However, given that multimodal trip rates should be considered these should be distributed onto the network appropriately. Given the location and scale it would be appropriate to do so from the Beach Road roundabout only. This would inform however how the development can best direct its sustainable access provision considerations.

Travel Plan

A travel plan has not been submitted to support the development and it is agreed that given the scale of development the threshold for a travel plan has not been met.

Recommendations

The Highway Authority require additional information in relation to the suitability of the sustainable access and existing highway network to accommodate safe and suitable access to the site. There are also concerns around the suitability of the proposed access arrangement.

If the Planning Authority are minded to determine the application please contact me for our formal recommendation.
If you wish to discuss the application further please do not hesitate to contact me.

Yours faithfully,

Holly Drury
Principal Transport Planner – Highways Development Planning
Hampshire 2050

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