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Date	13 February 2025	Email	havantdc@hants.gov.uk

For attention of Mr Eaves

Dear Sirs

Re: APP/24/01010 At Interbridges Site, New Brighton Road, Emsworth

Proposed employment development, with associated access, parking, yards and landscaping Classes B2 (General Industry), B8 (storage & distribution) and Class Ec-g)

Thank you for your consultation on the above full planning application. The applicant has submitted a Transport Statement to support the application which has been considered by the Highway Authority. The proposals are for the construction of 14 Class E commercial units with a net floor area of 2,221.3m² along with two storage yards totally 1,098.6m².

The Highway Authority have reviewed the submitted information and wish to make the following comments.

Policy Status

The site has been subject to a previous consent which is understood to have lapsed (APP/16/00295). This consent secured via condition a signal junction access to the site due to the sightline constraints to access as a result of the two bridge structures. This also brought benefits of controlled crossing facilities across the B2148 New Brighton Road.

It is noted that the site is allocated within the adopted Havant Local Plan under site BD39 Interbridges East.

Site Location

The site is located in Emsworth on the B2148 between the A27 bridge to the north and the railway bridge to the south.

Deputy Chief Executive and Director of Hampshire 2050
Gary Westbrook

Sustainable Access

The Highway Authority note that the site is considered to be in a sustainable location given the proximity of the site to Emsworth Station and Emsworth itself. A WCHAR however should consider the suitability of the walking and cycling routes in the immediate vicinity of the site. The Havant LCWIP identified opportunities for improvement to the route on the A259 which directly benefits enabling cycling from the wider Havant area to the development site. The walking infrastructure from the bus stops identified should also be reviewed given the need to navigate the A259/North Street roundabout. Opportunities to prioritise walking from the site to the centre of Emsworth should be considered.

Personal Injury Accidents (PIA)

Accident data has been collected from Hampshire Constabulary for the period 01 January 2019 to 31 December 2023. The accident data is over a year out of date and should be updated. The Highway Authority have checked the accident history for the area and can confirm that to the 31 July 2024 there are no additional accidents on the B2148 within the vicinity of the site.

It is agreed that there is no current highway safety matters arising from the accident statistics which would require intervention as a result of the proposed development.

Site Access

An appropriate access to the site was previously consented under application APP/16/00295. Reference is made in the TS to the signal scheme being proposed due to previous consented uses for the site. However, this is not the case. The restricted visibility splays to achieve a suitable site access is what has influenced the consented junction design. The bridge structures, carriageway horizontal and vertical alignment and pedestrian guardrailling prevent appropriate visibility to access the proposed development. The use of a signalised junction means the visibility constraints can be overcome.

Notwithstanding the above position the applicant within the TS has presented a priority junction access arrangement which has been reviewed by the Highway Authority.

Speed surveys have been undertaken north and south of the bridges to ascertain speeds in the vicinity of the site. The surveys were undertaken on the 19 September 2023 and 25 September 2023. This has recorded speeds of 33mph southbound and 29.5mph northbound in dry weather. Flows on the B2148 are recorded at a 5-day average of 13,468 two way.

Reference is made to the AADT on the B2148 is 12,684 in section 5.9 of the TA however at section 5.11 a figure of 13,468 is referenced. The Highway Authority agree with the 13,468 figure from a review of the traffic survey data.

Visibility splays have been calculated based on the recorded speeds of 2.4*47m north and 2.4*42m to the south.

Drawing 6069/001 Rev E and 6069/002 Rev C have been provided for the site access. This shows the proposed bellmouth junction, relocated crossing point and visibility splays. Visibility from the site access to the south cannot be achieved and is obstructed by the existing pedestrian guard railing. Visibility here would therefore require a departure from standard which has previously been considered by the Highway Authority as unacceptable. The visibility to the south for vehicular traffic is further compounded by the vertical and horizontal alignment of the carriageway. Vehicles travelling north on the B2148 have constrained visibility of a vehicle existing the proposed access because of these alignment constraints and the railway bridge structure. No intervisibility extents have been shown on the drawing.

To the north visibility is less constrained however it is noted that the safety audit has identified differing lighting levels as an issue for the proposed pedestrian crossing. This equally applies in the highway authorities view for more vulnerable road users such as motorcycles and pedal cycles. This is suggested within the designer's response to be a matter for detailed design stage, however it frames the fundamental suitability of the site access and proposed visibility splays so should be assessed appropriately at this stage. The other audit items raised are agreed to be detailed design matters.

Swept path drawings have been provided reference 6069/201 Rev E, 6096/202 Rev D and 6096/203 for an 11.2m refuse vehicle and a large family car in accordance with our design standards as set out in TG2. This shows that due to the internal alignment the access to the site is constrained should a large vehicle enter the site and its unclear whether a car and the refuse vehicle could pass safely. Thee refuse vehicle should be shown tracked against a waiting car and intervisibility between the two vehicles should be clearly shown. Given the levels difference and heavy planting at the site access and the intended use of the site that there could be conflict between vehicles at the site access resulting in reversing movements onto the B2148 which would be unacceptable in terms of highway safety. No tracking speeds have been noted on the drawings and these should be confirmed.

Refence is made in the TS to comments in relation to the application and the tracking for a 6.5m long small tipper. However, the Highway Authority have not previously commented on this access proposal and therefore recall no discussions around this. The site access should be tracked for the expected delivery vehicle types to the sought use.

The relocation of the pedestrian crossing to the north is considered to take pedestrians away from the desire line to cross which is as close to the railway bridge as possible. The crossing is currently located in the most suitable location between the bridge structures and its relocation is not supported. In highway terms the relocation of the crossing provides no betterment to those

walking and cycling and fails to prioritise sustainable movements appropriately.

The site access itself also fails to prioritise cycle movements given that it severs an existing shared use provision. There are no details on how cyclists are managed through the proposed access arrangement nor how they rejoin the carriageway at any revised termination point. This should be clarified. The scheme currently only has a detrimental impact on those walking and cycling on the B2148 in a location next to a core transport interchange.

Trip Generation

TRICs analysis has been undertaken to identify the likely trip generation for the proposed development. This has shown a total daily two-way vehicular trip generation of 349 trips. Industrial estates have been used to generate the trip generation for the site as the applicant considers that this gives a most robust consideration of the likely uses of the site. However, the use classes applied for are much broader than an industrial estate and these trip rates would not cover all potential uses of the site sought under the E(c-g) classes requested.

Recent trip rate for industrial use for the Downley Road application were also significantly higher. The Highway Authority are unable to locate the TRICs data on the planning portal for the Interbridges application (appendix 13) and this should be shared for consideration.

A number of trip generation scenarios will be required to sensitivity test the proposed rates based on a broad industrial use against a more broader consideration of trip rates and the worst case assumptions for the use classes being sought for consent.

Traffic Distribution/Assignment

Distribution of the traffic from the site access has been based on the existing flows on the B2148 and this is agreed as appropriate. This concludes 42% trips northbound and 58% southbound in the AM peak and 56% northbound and 44% southbound in the PM peak.

Junction Assessments

Junction modelling has been undertaken of the proposed priority junction. The applicant states this is to identify whether a signalised junction is required. However as set out the need for the signalised junction is due to the constraints of the visibility splays not as a result of capacity need.

Therefore, the junction assessment work has not been reviewed in detail as it is not contested that a priority junction would not be sufficient for capacity demand.

Summary

Whilst the priority junction arrangement would not be considered acceptable due to the visibility constraints and the impact to the pedestrian and cycle

infrastructure, it cannot be assumed by the applicant that a signal-controlled junction would be suitable when considered against current vehicle flows. The Highway Authority would need to understand the operation of the signal arrangement against the current volumes of traffic and the impact on the B2148 before it would be able to comment on whether the junction form in this location is acceptable.

Parking Provision

Havant Borough Council as Parking Authority should confirm whether they agree the parking calculations for both vehicle parking and cycle parking provision. The Highway Authority request clarity is sought on the locations of the cycle parking as these are not shown on the site plan PNH-9173-HYP-00-DR-A-000010 Rev P09. Parking spaces should also be provided with an appropriate landing area and there are a number of spaces which are reliant on servicing bays or areas of landscaping for access to the space. Alternatively, the dimensions of the bays can be more generous to allow appropriate space for accessing the vehicles. Accessing parking via servicing bays is wholly inappropriate. No disabled spaces are shown on the drawing and it is assumed there would be a requirement for disabled allocation.

Internal Road Network

The internal road network is not considered to be the creation of a new street and therefore the Highway Authority consider this to primarily a matter for the Planning Authority. Notwithstanding however comments have been provided on the tracking of the road in relation to its interaction with the site access. Also, it is noted that access within the site for pedestrians is poor. The footways cross over loading bays and there is no continuous footway provision to Block B. The layout is considered to be designed on the assumption that workers and visitors would arrive by private car and park closest to the unit being accessed which is not agreeable. The design of the site should appropriate accommodate for pedestrian movements from the site access to all units.

Visibility splays for the internal crossing point of the access road have not been provided either at the site access or internally. These should be shown and given the boundary levels and vegetation a long sections should also be provided.

A lighting specification has been provided however given the site would remain private, any offsite lighting requirements of the highway would be dealt with at the S278 stage.

A topographical survey has also been provided for the existing levels. The proposed levels should be provided on an engineering drawing of the site layout.

A drainage strategy has also been shown however this does not cover the drainage provision for the proposed access and these details should be provided.

Travel Plan

This Travel Plan has been assessed using Hampshire County Council's (HCC's) evaluation criteria for the assessment of travel plans – "A guide to development related travel plans".

Reference should be made within the travel plan to the Planning reference for the site.

Plan – The travel plan should include a site plan for the proposed development which should show:

- Car and pedestrian site access
- Car parking locations
- Cycle parking/storage locations
- Internal highway design, including:
 - Roads
 - Footways
 - Cycleways
 - Guidelines used to inform them

A Baseline mode-share should be established using valid and site-specific data, sources such as TRICS or Census MSOA data. A minimum 10% reduction in single occupancy vehicles should be sought, including a breakdown of each mode-share biennially. A justification for why mode-share will increase / decrease will be necessary.

A clear timeframe for the start point for the Travel Plan coordinator (to be at least 3 months prior to occupation to ensure uptake).

There are some additional measures which should be considered for inclusion within this FTP. Some of these measures may be applicable only to residents or employees, or to both groups:

- Promotion of free health apps
- Formation of a Bicycle Users Group (BUG)
- Bike services stations (staff and visitors)
- Guaranteed ride home for staff in emergency situations
- Review of car parking policy and introduce a management strategy
- Review of the issuing of car park permits to ensure a fair system, based on agreed criteria e.g. operational need
- Establish car club for site users to include Allocated priority parking space to car sharers
- Review employee parking entitlement
- Provision of information to all, visitors and staff on how to access the site by means other than the car through a variety of methods, including:

- Notice boards / team meeting agenda
- News letters
- Information packs for new recruits to be updated annually
- Staff feedback sessions
- Advertising TP to staff through recruitment, e.g. how to get there for interview and on the website

The action plan should include estimated prices for each of the travel plan measures. These will be used to inform the value of the travel plan bond or deposit.

The travel plan should include a monitoring timetable as laid out below and include the following commitments:

	Baseline (Year 1)	Year 2	Year 3	Year 4	Year 5
Level of report	To be submitted one year after occupation. This will include the baseline survey results found in the updated Full Travel Plan and a monitoring report.	Monitoring Report	Full Surveys - Monitoring Report	Monitoring Report	Full Surveys - Monitoring Report

- Measures to ensure that this response rate is met, e.g., a voucher for supermarket or online retailer.
- Alternative method of survey if 35% response rate not achieved, e.g., ATCs/TRICS.
- Monitor the car park usage
- Keep records of participation in sustainable travel scheme and incentives
- Monitor number of car sharers
- Monitor number of bicycles parked on site

The Travel Plan should include a commitment to pay HCC's monitoring and approval fees

- Commitment to provide a Travel Plan Cash Deposit of equal value to travel plan measures
- Sanctions in the event of non-compliance

Travel Plan Summary

The travel plan should contain a closing section which concludes the travel plan. This should summarise all the key points from each section of the document.

The FTP will require further amendments as set out above before it can be considered acceptable for submission in conjunction with the proposed site.

Recommendations

The Highway Authority consider that the site access cannot achieve appropriate visibility due to the constraints of the existing rail structure. The

relocation of the uncontrolled crossing away from the design line is also considered to prioritise vehicular movements above those walking and cycling. The access strategy for the site is therefore not supported and should the Planning Authority be minded to determine the application please contact me for my reasons for refusal.

Yours faithfully,

Holly Drury

Principal Transport Planner - Highway Development Planning
Hampshire 2050