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Date	23 May 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 additional information submitted to support the application. This includes a response to our letter dated 13 February 2025, a revised Travel Plan and a WCHAR document. The Highway Authority have reviewed the submitted information and wish to make the following comments.

Sustainable Access

In response to our comments requesting a WCHAR considering the LCWIP route along the A259 and the routes to the bus stops identified within the Transport Statement (TS), the applicant has submitted a WCHAR assessment which has been reviewed. The assessment extents are agreed to be appropriate.

The WCHAR states that a review of the LCWIP does not identify any improvements relevant to the routes assessed however this is not agreed. The following are identified:

- 277.3.8 – improvements to cycling continuity through the Horndean Road/Southleigh Road junction including potential provision of a controlled crossing
- 277.3.10 – a dutch style roundabout at the New Brighton Road/Southleigh Road junction

Deputy Chief Executive and Director of Hampshire 2050
Gary Westbrook

The WCHAR itself identifies the following deficits:

- Lack of tactile paving on the side road junctions along New Brighton Road
- Footpath obstruction by overgrown vegetation on New Brighton Road (southern end)
- Tactile paving at the New Brighton Road/Horndean Road junction
- Tactile paving at the Woodlands Avenue and the Cotton Drive junctions with Southleigh Road
- Hedgerow maintenance on Southleigh Road
- Tactile paving at the King's Terrace junction.

However, the WCHAR has not considered the infrastructure against the healthy streets assessment tools or LTN1/20 and therefore is not forthcoming with meaningful improvements beyond tactile paving provision. The Highway Authority also note that reference is made to contributions towards improving walking and cycling access to this new employment space through CIL. This is not agreed an appropriate mechanism to meet the needs of ensuring the site is accessible by all modes.

The Highway Authority do agree that the New Brighton Road/Horndean Road junction is the most directly relevant location for a contribution to be made towards given its proximity to the site. However, the Highway Authority would be seeking a more ambitious improvement to the pedestrian and cycling provision around this core junction than simply providing tactile paving.

Site Access

The Highway Authority have reviewed the comments made by the applicant in the letter dated 14 March 2025 and have the following comments to make.

Site Access

Whilst additional information has been provided on several drawings it is noted that the footprint of the site access arrangement is not consistent across the drawing pack. A consistent GA should be provided for consideration.

The Highway Authority consider that the priority arrangement shown on drawing 6090/001 Rev F would take pedestrians away from the desire line and is therefore not supported. The priority give way arrangement shown also only gives priority to those vehicles exiting the site which is not considered appropriate. Vehicles waiting at the give way line would also sit across the priority arrangement if larger than a family car. A crossing should therefore be maintained on the desire line.

The width of the bellmouth should be confirmed. The crossing distance may require provision of a refuge island to support all users.

Regarding visibility splays, the Highway Authority note the drawings and evidence provided within the letter. However, it is felt that insufficient information is presented to enable the Highway Authority to agree with the

conclusions of the consultant and to address the concerns raised within the previous response.

The relocation of the crossing point also remains a point of concern, whilst the comments are noted from the applicant. Notwithstanding the deviation away from the desire line for access to the northern train station platform, the light issues identified within the audit report and accepted by the applicant remain outstanding. The designer's response states that this can be dealt with at detailed design stage however this is not agreed.

The letter also does not set out how the impact to pedestrians and cyclists is to be addressed through the design or how the cycle infrastructure will be altered.

Additional information should be provided as follows to demonstrate whether a safe and suitable access can be achieved in the form proposed:

- A visibility assessment should be provided within the vertical plane in addition to the horizontal assessment.
- Pedestrian and cyclist visibility should be shown from the uncontrolled crossing of the major carriageway in accordance with TG3.
- Amendments to the cycle path as a result of the access and therefore revised routing for cyclists to the train station should be clearly shown.
- Consideration of the effects of glare on the drivers passing under the bridge to the north and its impact on visibility of the pedestrian crossing. Appropriate assessment and consideration should be given and put forward for review to the LHA including a glare assessment and the forward visibility to users of the crossing given the glare considerations.

Notwithstanding the points of concern around the design, crossing the B2149 is difficult given the volumes of traffic and the signals whilst providing access to the site also addressed this crossing severance issue. Given the road safety concerns a standalone signalised controlled crossing may address the issues around the need to relocate the crossing to accommodate the proposed site access. This should be considered by the applicant.

Revised tracking drawings as requested have been provided at 10mph for vehicles expected to access the site and show a refuse vehicle passing a car within the internal layout and at the site access.

Trip Generation:

The applicant has submitted the request TRICS data to the response letter. This has been reviewed, and it is noted that sites within Wales have been included and this should be removed. There are also surveys undertaken during 2020 when COVID19 restrictions were in force and therefore the surveys should be removed from the data set.

Notwithstanding the above the resulting proposed trip rates equated to 28 movements in the AM peak and 23 in the PM peak. The applicant has also

undertaken a comparison to the Downley Road trip rates demonstrating for the B2 and B8 uses the resulting trip generation put forward by the applicant is higher than if the Downley Road trip rates were used pro-rata.

The applicant sets out that the Downley Road site is forecast to generate 34 movements in the AM peak and 39 movements in the PM peak as a result of its trip generation assumptions.

Whilst the comparison work may show that the TRICS assumptions for the mixed B2/B8 use are robust the proposed development site is more open in its use than the Downley Road site. In addition, the suitability of the access form is open to more specific considerations around whether it is safe and suitable. Therefore, the TRICS work required to ensure all operational scenarios are understood is key here.

The Downley Road site showed for example that the existing trip generation would have been 70 movements in the AM peak and 63 in the PM peak if all B2 use. Therefore, demonstrating that the type of use to come forward on the development does influence the overall trip rate.

This application sites total potential uses is greater in breadth with E class uses included, therefore as requested a comparison between the uses proposed for the development should be made to ensure the trip generation presented is suitable.

Junction Assessments

The applicant has not provided any further information or discussion points around the junction assessment work.

The junction assessment work has still not been reviewed in detail, but it is not contested that a priority junction would be insufficient for the needs of the site.

Summary

Whilst the priority junction arrangement design remains a concern the amendments to design standards means the Highway Authority are minded to reconsider the position given benefits to the B2149 through traffic. However suitable evidence must be provided to address the design concerns raised within this and the previous response and appropriate provision for pedestrians and cyclists that mitigate the need to cross the access proposals and divert away from the core desire line. The Highway Authority therefore welcome further engagement with the applicant to consider whether a bellmouth arrangement can operate safely in this location.

Parking Provision

No amendments have been made to the parking provision and the letter from the applicant simply states that Havant Borough Council as Parking Authority have agreed the parking requirements. There are however design considerations raised within our previous response and the Planning Authority

should give due consideration to these design points to ensure parking is safely accessible for users within the internal layout.

Internal Road Network

The Highway Authority made observational points regarding the internal layout design within the initial response to inform the Planning Authority in their decision making. The applicant has not looked to address the design issues raised and the Planning Authority are reminded of the points noted within that response which should be given due consideration.

Visibility splays for the internal crossing point of the access road have now been provided on drawing 6096/007. These should be shown and given the boundary levels and vegetation a long section should also be provided however no long sections have been included to ensure that these can be achieved with the levels of the site, in particular towards the site access. Visibility splays have been shown for this crossing at 1.5m*25m distance in accordance with Hampshire's TG10 guidance. However internally these visibility splays are obstructed by vehicle occupying parking spaces and therefore it is considered that the crossing point is poorly located within the internal layout.

Information has not been provided by the applicant on the following matters:

- A topographical survey has been provided for the existing levels however 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

A revised travel plan has been provided by the applicant. This has been reviewed using Hampshire County Council's (HCC's) evaluation criteria for the assessment of travel plans – "A guide to development related travel plans". 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

- Bike services stations
- Staff feedback sessions
- Advertising TP to staff through recruitment, e.g. how to get there for interview and on the website

The total costs for the Green Travel Voucher cannot be calculated due to the staffing levels being unknown at this stage of the application.

As we need to calculate a bond or deposit based on the value of the measures in the travel plan's action plan, the next revision should include a educated estimate of the total number of staff that would likely be working in the development. The alternative is the travel plan is secured with a bond

value of 110% the cost of the travel plan within any S106 should a positive determination be made on the site, with the bond figure confirmed at the full travel plan stage.

Recommendations

The Highway Authority remain concerned that the site access has not been demonstrated to be suitable in terms of operational safety and therefore would require additional information before an objection to the proposals could be withdrawn.

In the absence of the additional information and if the Planning Authority are minded to determine the application please contact me for our reasons for refusal.

Yours faithfully,

Holly Drury
Principal Transport Planner – Highways Development Planning
Hampshire 2050