

1 Stockheath Lane
Havant
Hants
PO9 3BU

31st July 2024

Dear Sir/Madam

**APP/24/00405: Hybrid application seeking inter alia full permission
for development of new pipelines etc.**

Objection

1. I should start by saying I support the proposals as an essential investment in meeting our future water needs and my objections and reservations set out in this letter are about specific details of the application as they affect me and, by implication, my immediate neighbours.
2. I believe these can be resolved and my objection withdrawn if the applicant can clarify certain information and is prepared to consider and adopt my suggested amendment for access to shaft 4.
3. I am objecting because:
 - there are inconsistencies between the reports I have read (those of most direct interest to me) including the peak number of workers on the pipeline,
 - there is a lack of clarity in respect of providing for workers parking,
 - the Travel Plan is inappropriate to this project and unlikely to provide any worthwhile benefit. It also omits measures included in the Construction Traffic Management Plan.
 - there is inconsistent information on the routing of hgv to and from Shaft 4.
 - The proposed access to Stockheath Lane is poorly sited and an alternative location would have less impact on nearby residents
 - There does not seem to be a justification for removing a further six on-street parking in Stockheath Lane for the duration of the project and I question both the need and the conclusions of the consultants parking survey.
4. I understand from the Phasing Plan document works in this area (Shaft 4, Stockheath Lane) are anticipated to commence in Q2/Q3 of 2025 with completion in Q3/Q4 2027, so a construction period of potentially up to two and a half years, a significant period of time for residents in an area in which a substantial number of homeowners are retired (and so usually at home during the day) and not always in good health. It should therefore be a matter of some importance that they are disturbed and inconvenienced no more than necessary.
5. I have some experience of the issues I am raising as for many years I was the manager at Portsmouth City Council responsible for advising the local planning authority on the

highways aspects of development control, contributing to and then leading a team assessing planning applications ranging from single dwellings to major developments including the redevelopment of the former Airport (Anchorage Park), Port Solent and Gunwharf Quays. I was also closely involved in the city council Local Agenda 21 initiatives in the late 1990s and into the twenty-first century, leading on measures to reduce unnecessary use of cars and encouraging and facilitating better use of public transport and cycling. In this role I developed and implemented the council's own (Green) Travel Plan subsequently working with the local Chamber of Commerce through the SignPOST forum to encourage major employers across Havant and Portsmouth to develop and implement their own Travel Plans.

Submitted Travel Plan

6. I commend the applicant for looking into the opportunities to reduce car use by workers but I believe, despite the inclusion of this document, the applicant does not believe the project is one where significant modal shift can be achieved and despite my support for travel plans in appropriate circumstances I think that is a fair and correct assessment.
7. The submitted Travel Plan indicates that during peak construction there will be 65 workers per day although the Construction Traffic Management Plan (Section 3 Table 1) refers to 125 working on the pipeline; which figure is correct needs to be clarified.
8. Of the 65, if that is the correct figure, it is anticipated that approximately 45 will be living or staying locally, in accommodation close to site and within travelling distance (?) and with the remaining 20 living away, originating from surrounding counties (paragraph 4.2). The nature of the project is that these workers will not be at a single location for the duration of the project but will move along the route as the pipeline progresses. This would make it very difficult in practice for individuals to rely on public transport to travel to the work site - as the work site changes so will the public transport options available including bus routes and proximity of train stations serving the various locations. Although cycling might offer an alternative to car use for some workers living locally with cycling levels in the UK of about 2% (<https://www.cyclinguk.org/statistics>) this would equate to a single cyclist. The real-life conditions and the relatively small number of workers (a peak of 65, or perhaps 125, possibly distributed over more than one location at any time) leads me to conclude that a workforce travel plan for this proposed development is unlikely to be meaningful or effective in significantly reducing car journeys by workers. I cannot see the incentives proposed by the applicant - paragraph 5.1 - resulting in any significant change and the small degrees of change anticipated - generally a 1% increase on "do nothing" levels - set out in paragraph 6.1 as CWTP targets support this view. The baseline modes are not known at this time but as an example if we were to assume 1 worker (1.5% of a workforce of 65 persons) would cycle (active travel) to the construction sites with the travel plan this would increase to 1.01 workers in year one and 1.02 workers in year 2, a meaningless increase. In a scenario where all 65 workers could, without intervention, drive alone to the sites, in year two under the travel plan this might reduce to 63 workers (97% of the base figure). This is a best case scenario of a reduction in two cars in year 2.

9. I conclude that even with the travel plan almost all, if not all, workers will travel to the various sites individually by private car irrespective of the suggested incentives and as such the travel plan is simply "greenwashing", committing a small sum of money to achieve probably nothing meaningful.
10. If we can accept that the reality of this type of construction project is that any foreseeable travel plan is unlikely to be effective and so simply a waste of resources the question then becomes:

"How do you mitigate the impact of workers cars on nearby residents and businesses"?

11. I suggest one "simple" answer would be to direct all workers to one or more nominated parking areas from where they would be transferred to the site(s) by company transport - a project specific park-and-ride scheme. Contracts of employment would require workers to use the park-and-ride scheme with penalties for non-compliance. In fact the Construction Traffic Management Plan Section 3 Table 1 does refer to a minibus to "shuttle staff to and from the CSS welfare facilities with the objective to "minimise the impact of staff travel on the local highway network" although this minibus is not referred to in the Travel Plan. But it is for the applicant to propose suitable measures for each construction site where worker parking might constitute a problem for local people and businesses and how to address this. On this matter the application is very quiet.
12. I feel in the circumstances of this development, taking into account the geographical spread of the works, the size of the workforce and the constraints on undertaking meaningful measures the applicant would have been better advised to have made the case for not submitting a Travel Plan than to submit one which I feel is unlikely to achieve any measurable effect and instead concentrate on how to manage and provide for workers' car parking to minimise impact on nearby residents and businesses.

Impacts on Stockheath Lane - access and worker parking

13. I raise an objection to the proposal for access from Stockheath Lane as currently shown in Figure 4 of the Construction Traffic Management Plan as I feel it unnecessarily and avoidably impinges on my ability to enjoy my own house and garden and to varying degrees conditions for my neighbours for the 2+years of the project.
14. I reproduce below part of Table 6: Pipeline Construction- Trip generation from the Construction Traffic Management Plan.

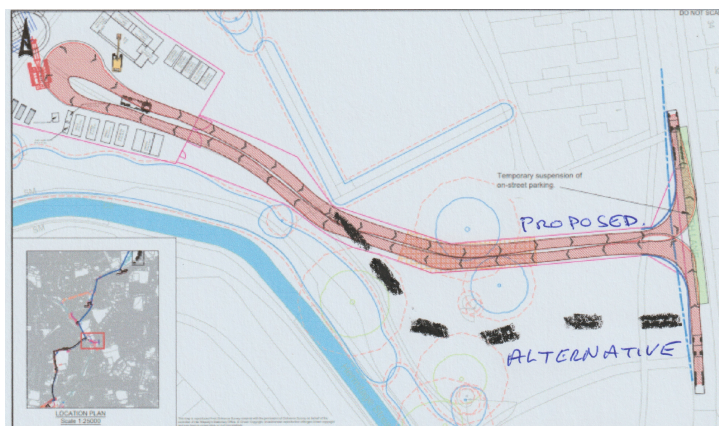
Route Element	Average HGV trips (two-way)	85 th Percentile HGV trips (two-way)	Maximum HGV trips (two-way)	Potential duration of HGV trips (number of days)
RE1	28	60	100	2
RE2	16	44	84	3
RE3	16	42	84	2
RE4	10	26	82	1

15. Stockheath Lane is accessed by RE3. Firstly I question how for a project of this nature lasting up to 30 months the final column can suggest there will be only 2 days where there are hgv trips; should this refer to “number of years”?
16. Secondly, the level of trips is not insignificant. Taking the 30 month figure for the construction of Shaft 4 from the Construction Traffic Management Plan and assuming no work on Sundays this is 780 days and on nearly 120 of these the two way flow on the access road will exceed 42 hgv (plus other unspecified vehicles).
17. I feel it is reasonable the applicant makes all reasonable effort to mitigate the impact this traffic will have on my family and our neighbours in our homes.
18. I do not question that the only reasonable access to construct Shaft 4 is from Stockheath Lane. However firstly I question why the vehicle tracking shows lorries approaching from Barncroft Way (New Road via Barncroft Way seems a sensible route) yet departing via Stockheath Lane and then Stockheath Road, Blendworth Crescent or Riders Lane all of which would take hgvs unnecessarily through residential areas and would be contrary to Section 3 Table 1 of the Construction Traffic Management Plan which says “Routing through Leigh Park for HGVs will be minimised unless necessary to reach a section of pipeline within this area and is to be agreed with the Highway Authority” and giving the reason “To ensure the principal road network is used where possible in the interest of road safety and to reduce the time period an impact may be experienced by the local population”, It is also not consistent with Figure 13, Main Pipeline Works Construction Route, of the same document.
19. Logically and in accordance with the stated principle the outbound route would be the reverse of the inbound route. This arrangement has not been tracked (plotted) and I ask why it apparently has not been considered.
20. I object to the decision to locate the vehicle access opposite 22-26 Stockheath Lane and the haul route so close to my property. This decision has multiple implications for residents:
 - a. My wife and I will be subject to unnecessary and avoidable noise and possibly unnecessary dust, pollution and vibration.
 - b. The houses opposite the access will have the noise and disturbance of hgvs and other vehicles slowing down, braking, accelerating and changing gear immediately outside their windows and the headlights of vehicles emerging from the access for at least part of the year will be shining directly into their living rooms.
 - c. Based on the tracking provided, to enable the turns to take place parking on the east side of Stockheath Lane will need to be suspended (banned) as far north as 32 Stockheath Lane - parking is already banned on the west side of the road. This will remove parking for people dropping off and collecting pupils at the Trosnant Schools, allotment holders and residents and their visitors (including health care workers; I have previously said many residents are elderly). Table 3 of the Construction Traffic Management Plan suggests the removal of 6 parking spaces for a period of 20 months and suggests average usage of these spaces as a single vehicle with a peak usage of 3 vehicles. These spaces are directly visible from my home and I dispute the accuracy of the survey(s) - at times the level of parking is such that this part of Stockheath Lane operates as a single track road with passing

spaces - not a situation consistent with there being 50% or less utilisation of the 6 spaces. (The parking capacity in Stockheath Lane was only recently reduced with the introduction of a parking prohibition covering the Stockheath Lane junctions with Riders Lane, Blendworth Crescent and St Francis Place).

- d. My experience is that parking surveys of this nature supporting planning applications have to be treated with caution. As an example a few years ago there were proposals to increase the pupil population of the Trosnant Schools by 50% (subsequently abandoned when the underlying estimates of growth in pupil numbers were found to be flawed). That application was also supported by parking surveys that indicated spare parking capacity in Chilcombe Close and Holybourne Road with about 80% utilisation at peak, despite the actually levels of parking being so high that condition were so bad that residents were (and continue to be) unable to get to and from their homes at school leaving times, with parking taking place on the prohibition of parking markings and across private drives. I recorded 120% utilisation using the Lambeth Parking Survey Methodology (an established methodology accepted by many if not all local highway authorities), a level of utilisation consistent with the observable problems. The signs erected in Chilcombe Close appealing to parents not to drive in and park in that road because of the safety issues albeit they are generally ignored.

21. **I propose the access is moved further south** to be opposite the fence to the garden to 20 Stockheath Lane (not opposite the building itself) and the hgv routing is confirmed as inbound and outbound via Barncroft Way/New Road. With these amendments these problems if not fully resolved are at least substantially mitigated - there are existing working day parking restrictions on the east side of Stockheath Lane as far north as the driveway to 20 Stockheath Lane so other than possibly extending restriction this to weekends no further parking restrictions should be necessary. The route can then pass through the southern break in the trees (rather than the northern one shown) increasing as far as possible the separation between the haul road and my house and garden. (I note the detail on one of the drawings of protection to tree roots which could be included with my suggested alternative alignment).



22. The proximity of the site access to the school entrance should not be an issue as the Construction Traffic Management Plan already includes a commitment that "All site traffic will be scheduled to arrive and depart site outside of school drop off and pick up times, with a banksman present at the gate upon traffic arriving to site" (Section 3, table 1). This arrangement could be extended at exceptional times by agreement between the schools and the contractor. This route also retains a more useful public open space area than the route shown, which bisects the land.
23. The Construction Traffic Management Plan says "Contractor parking area will be provided ... within the working areas (W1 – W8) , *where practicable* to ensure no parking on local residential streets". I am concerned at the use of "*where practicable*" as Stockheath Lane is narrow (barely 5.5m wide) and as already stated well used for on-street parking by residents, parents dropping off and picking up children attending the Trosnant Schools, allotment holders and those using the open space. This is in addition to its function as an important traffic route in the local area. Any additional use for parking by construction workers can only be to the detriment of those existing users. It is a matter of concern therefore that in the Construction Traffic Management Plan there is no indication of dedicated off-street parking for workers at Shaft 4 and in the absence of this the presumption has to be that workers will either park on-street in Stockheath Lane or informally on the verges and open space, neither of which can be considered acceptable. I therefore raise an objection in respect of lack of provision of off-street parking for workers at the Shaft 4 construction site leading to additional congestion and possible danger in Stockheath Lane.
24. This lack of clarity about workers parking, with its potential to have a major impact on residents own on-street parking opportunities, may apply to others sites as it does Shaft 4 and I believe is something that needs to be considered and agreed prior to the grant of planning consent rather than left until after consent is granted, even with conditions, when the LPA will have less leverage to secure appropriate provision or control. Insisting on a resolution now will bring focus to this issue.
25. Section 13 of the Construction Traffic Management Plan says "Vehicle Timings. No construction on the pipeline site shall take place outside the agreed working hours with the Local Planning Authority" but there are no proposals within this plan for working hours and days and therefore the public cannot comment on these. I feel working hours is again an important consideration for the public and should be agreed at the time of granting planning consent.
26. In conclusion, I am unconvinced of the value of Travel Plan for this type of development.
27. I formally object to the location of the access to Shaft 4 from Stockheath Lane and the route of the haul road so close to my property.
28. I object to the unnecessary loss of on-street parking in Stockheath Lane made necessary by the location of this access, the routing of outgoing hgvs to turn north for Stockheath Road, Riders Lane or Blendworth Crescent and
29. I object to the lack of identified parking facilities for workers at Shaft 4.

30. Finally I believe the proposed hours of working should be considered as part of the decision whether to grant planning consent in order that the public have an opportunity to comment.
31. I believe all these issues can be resolved, or at least mitigated, before planning consent is granted and, subject to the resolution of my objections, support the overall objectives of the scheme.
32. In the event that my objections cannot be resolved I would like to address the Committee on my concerns before the application is determined. Ideally this would be preceded with a site visit so that members can appreciate the problems caused by the proposed access and how my alternative can be safely and conveniently accommodated.

Yours faithfully

Paul Denyer