



Head of Development Planning

Havant Borough Council
Civic Offices
Civic Centre Road
HAVANT
Hampshire
PO9 2AX

*Economy, Transport and Environment Department
Elizabeth II Court West, The Castle
Winchester, Hampshire SO23 8UD*

Tel: 0300 555 1375 (General Enquiries)
0300 555 1388 (Roads and Transport)
0300 555 1389 (Recycling Waste & Planning)
Textphone 0300 555 1390
Fax 01962 847055

www.hants.gov.uk

<i>Enquiries to</i>	Chris Hirst	<i>My reference</i>	6/3/13/201
<i>Direct Line</i>	0370 779 0563	<i>Your reference</i>	APP/21/01010
<i>Date</i>	29 th June 2023	<i>Email</i>	Chris.Hirst@hants.gov.uk

For attention of Leanne Richardson

Dear Madam,

Re: Erection of 184 No. dwellings (no. of dwellings reduced from 194), means of access, public open space, play areas, associated infrastructure and landscaping | Land East of, St Georges Avenue, Havant

Further to the Highway Authority's responses dated 15th December 2021 and 2nd December 2022, the applicant has submitted a Highways Response Note (HRN) to address the latest round of comments.

Following a review of this document, the Highway Authority wish to make the following comments.

Policy

The Highway Authority consider that the policy position here is pertinent to the decision making in relation to this site, which is set out below for clarity.

The site was originally an emerging allocation within the now withdrawn Havant Borough Council Local Plan under policy H16. Within this policy, the site was to be allocated for 260 dwellings which included the Persimmon Homes development. The site was a single allocation which has been split by the land promoter between developers. Persimmon brought forward the first phase of development for 69 dwellings and the requirement to not fetter the pedestrian and cycle link to Emsworth Road was noted within the response from our agent dated 6th November 2018 under application reference APP/18/01033. Monies were also secured towards capacity improvements at Warblington Roundabout as part of a proportional contribution given the land constraints.

Director of Economy, Transport and Environment
Stuart Jarvis BSc DipTP FCIHT MRTPI

The remainder of the site is now proposed to come forward through this application which is noted to now complete the development within the allocation. The remaining matters from the original emerging policy remain as follows:

- *The application to be supported by a transport assessment and travel plan.*
- *That the site is developed comprehensively, or if this is not possible, the development of one part must not prejudice the development of the other part;*
- *The design and layout;*
 - *Does not prejudice the future delivery of A27 junction improvements to facilitate access arrangements to the Southleigh Strategic site to the north;*
 - *Creates a new pedestrian and cycle access to Emsworth Road in the south-west of the site; and*
 - *Provides or, at least does not prejudice a pedestrian and cycle link under the railway line to provide easy access to Warblington Station from Southleigh (Policy KP5).*

The H16 policy was reviewed by an inspector as part of the EiP for the now withdrawn local plan. There was no issue or narrative raised by the inspector in relation to this site which made up any reason for the Local Plan withdrawal. In reaction to the withdrawal of the Local Plan, Havant Borough Council issued their Housing Delivery Position Statement (HDPS) which provided an interim policy position for those sites within the withdrawn Local Plan which they support coming forward in the absence of the Local Plan. Within the HDPS, there are number of points pertinent to the decision making around this application.

Firstly, Decision Making Principle 2 of the HDPS sets out the need for compliance with the site-specific policies within the Development Plan and the Decision-Making Principles within the HDPS, in this specific case that is the requirements set out within policy H16. Paragraph 2.19 sets out that that applications wishing to depart from the planning requirements stipulated within those policies would need to justify that in the absence the development still complies with the remainder of the Development Plan and Decision-Making Principles and still constitutes sustainable development.

Decision Making Principle 5 of the Housing Delivery Statement sets out the need for the following:

- Provide infrastructure which is needed to make the development acceptable in planning terms, in line with the Council's Infrastructure Delivery Plan and Developer Contributions Guide
- Create new and improve existing pedestrian and cycle route linkages which connect to all parts of the development and facilitate easy and safe access to education employment, and the nature environment for all users.

Notwithstanding the above, NPPF clearly sets out that development should be sustainable in nature with a definition of sustainable at very high level being 'as meeting the needs of the present without compromising the ability of future generations to meet their own needs'. NPPF goes on to state that this includes having accessible services and moving to a low carbon economy and includes further requirements within paragraph 104, 110 and 112.

The requirement for the H16 policy items was established from the Local Plan consultation process with the Highway Authority and the recognised need for the connections in order to integrate the site with the wider community and overcome existing deficits which would exacerbate the current limitations of the existing cycle network. At the policy making stage, the proposed allocation was therefore only considered acceptable for allocation subject to the specific policy requirements which were agreed with Havant Borough Council and the land promoter at the time of the emerging policy. In the absence of such agreement, the Highway Authority would have considered the allocation unacceptable in terms of the reliance on sustainable infrastructure along St Georges Avenue and Castle Avenue and therefore inappropriate for the quantum of development.

Walking and Cycling

Within the Highway Authority's previous response, the applicant was asked to undertake a comparison of the distances to local facilities in the absence of a pedestrian and cycle link in the southwestern corner of the development.

The assessment identifies varying increases and decreases in the distances when comparing the routes between St Georges Avenue and the proposed southwestern link. Whilst locations such as the Emsworth Road bus stops and Emsworth were not considered in the original assessment, these are other facilities and locations which suffer from having a direct desire line removed in the absence of the southwestern link, with increases in distance reflective of this deficit. Destinations in Emsworth itself or consideration of Emsworth and its provision of key facilities have not been considered within the assessment, nor have the recreational draws of the facilities east of the A27 and these should be included within the TA to ensure a comprehensive assessment.

The HRN refers to the land constraint to the south-western corner remaining and seeks to justify the sustainability of the development in the absence of the link to Emsworth Road. Firstly, this assessment is biased by not considering facilities to the east of the site. Secondly the Highway Authority do not agree with the conclusion drawn. The measurement provided appears to be from the centre of the site which is not an accurate assessment of the impacts of providing or not providing the connection. Whilst it is acknowledged that the distance impacts are lesser for the in the northern area of the site, they are considerably greater for those living in the southern part of the development where distances to simply exit the site are circa 250m (500m return journey). This additional distance is sufficient to deter sustainable travel choices due to the return journey time impacts and it becomes quicker to utilise the private

car for such journeys. An assessment should fully consider the impacts across the site for all residents, which in turn downplays the implications of not delivering the southern route. This includes to the Primary School which has a journey time increase without the southern link. The journeys can be reduced below the 2km recommended absolute walking distances through a connection to the south. It is not agreed that the measurements shown within the TA are accurate for the route via the north with a more accurate measurement of 2.1km from the middle of the site.

It is also noted that the absence of the link has implications on the distance to frequent bus provision. The bus stops on Southleigh Road provide limited bus services to Emsworth and Rowlands Castle every 2 hours. However, the bus stops on Emsworth Road provide frequent services to Portsmouth and Chichester every 20 minutes, also stopping at Havant bus station. Given the frequency of these services, the Emsworth Road bus facilities are likely to be better utilised when compared to the infrequent services provided by the stops on Southleigh Road. In the absence of the pedestrian and cycle link, the distance to the eastbound Emsworth Road bus stops increases by over 400m to 850m, whilst the westbound stop is a 1km walk, again increasing by over 400m, when taking the distance from the southern side of the site. Again, this is likely to deter pedestrians from walking the bus stops given the circuitous nature of the route.

Furthermore, the Highway Authority understands that the land constraints preventing the southwestern link from being provided also apply to the vehicular access along with the pedestrian link which would be provided alongside this arrangement. Whilst the Highway Authority maintains its view that the southwestern link is required to make this development acceptable in planning terms (as identified within Havant Borough Council's previous emerging local plan policy), the applicant's inability to demonstrate any deliverable pedestrian and cycle connections at this point in time means that the site is currently unsustainable, and access cannot be achieved in the previously identified locations.

In the absence of confirmation on both of these matters, the Highway Authority is unable to amend its position set out within this and our previous planning responses.

Castle Avenue / Warblington Avenue / St Georges Avenue traffic calming measures:

The applicant continues to maintain that the existing infrastructure between the site and Southleigh Road meets LTN 1/20 standards and the HRN sets out the following reasons:

- The necessary features are provided to demarcate the transition from the shared use path on Southleigh Road to the on-carriageway route provided along St George's Avenue; and

- Recorded speeds are below 30mph, traffic flows are likely to be less than 2,000 daily PCU's and there are no recorded accidents along St George's Avenue.

The HRN goes on to note that the applicant is willing to provide a contribution towards a TRO to extend the parking restrictions along St George's Avenue and improve the surfacing across the junctions with Castle Avenue and Warblington Avenue. These measures would provide some benefit however, the Highway Authority disagrees with the analysis above regarding LTN 1/20 compliance of the existing facilities.

As the HRN states, LTN 1/20 Figure 4.1 indicates that a 30mph road with PCU flow lower than 2,000 a day which provides either mandatory or advisory cycle lanes would result in provision that is not suitable for all, excludes some potential users and may result in safety concerns. Irrespective of the status of the southwestern link, St George's Avenue will be utilised by children heading to school who may therefore fall within the criteria set out in Figure 4.1.

Appendix B indicates that the average daily traffic flow along St George's Avenue in 2018 was 199 vehicles. The original Transport Assessment supporting the current planning application forecast 12-hour vehicular trips of 1,280. Applying the forecast trip rate to the extant consent granted for 69 dwellings to the east of Castle Avenue results in a further 455 trips over a 12-hour period. Accounting for all of the above, and future traffic growth, the traffic flow along St George's Avenue will be over the 2,000 daily PCU's referred to within the HRN and whilst this does not change the categorisation within Figure 4.1, it does increase the risk of interaction between vehicles and cyclists and further demonstrates the need for a protected space for cyclists as a direct result of the development's increase in vehicular traffic along this route.

The increase in traffic flow and access to two new developments changes the nature of St George's Avenue into a primary street, where the likelihood of a vehicle and cyclist interacting increases significantly against the current recorded vehicular flow. Due to the presence of parked vehicles on St George's Avenue, the available carriageway width decreases to 3m in places, which is below the 3.2m – 3.8m width LTN 1/20 recommends avoiding for an ambiguous space for safe overtaking, but may still result in vehicles attempting to overtake a cyclist in narrow areas. St George's Avenue is also used by parents as a location to park and drop off and pick up their children in the morning and afternoon, increasing the frequency of parking and, in some cases, further obstructing access to the cycle slip at the junction with Southleigh Road. With additional traffic along the road, cyclists are likely to feel further squeezed against parked vehicles, exacerbating the issues noted above in terms of non-compliance with LTN 1/20 Figure 4.1, and the fact that the route is not safely accessible for all users.

These concerns are not only pertinent to future occupants of the site, but also for existing users, some of whom travel via St George's Avenue to access

Warblington School. The route from Emsworth Road, Castle Avenue and St George's Avenue is the signed cycle route to school and also features as a primary route on Havant's LCWIP. The straight east-west alignment of St George's Avenue will be extended through the proposed development, with drivers travelling at speed potentially unaware that cyclists may be turning out of Castle Avenue when travelling to school. Measures should therefore be introduced to raise awareness of cyclists turning out of the junction when following the signed cycle route along St George's Avenue and/or reduce vehicle speeds on the approach to the junction. These measures should be reviewed holistically with improvements along the rest of the road, taking account of the measures also identified within the LCWIP.

The Highway Authority therefore considers that there are a number of reasons why dedicated cycle infrastructure is required along St George's Avenue to facilitate safe access for cyclists both to and from the development, but also to ensure that existing users are safely catered for.

In light of the above, the Highway Authority maintains its position the applicant needs to explore LTN 1/20 compliant infrastructure along St George's Avenue.

Warblington Footbridge

As previously set out, Warblington Footbridge has a current funding shortfall, and it is considered that sites which are either reliant on the route on Southleigh Road to access services or the Railway Station itself should make a fair and reasonable contribution towards the funding deficit. This approach has been agreed for other recent development sites. Therefore, it remains the view of the Highway Authority that a contribution should be secured from this site towards sustainable transport improvements which includes the use of funds towards the Warblington footbridge scheme. The Highway Authority welcome further discussions to agree an overall mitigation package for this site.

Wayfinding

The wayfinding deficits referred to within the Highway Authority's previous response related to the Hayling Billy Line route, running in between School Lane and East Street, which would provide an alternative, off-carriageway walking route for school children. This route continues through Town End House Car Park to Grove Road/Lower Grove Road which may present a more attractive alternative for pedestrians and cyclists.

The HRN refers to the Persimmon Homes development which did not contribute towards wayfinding facilities. The current application is for 184 dwellings compared to the consented 69 dwellings and is located further from the identified schools. In the case of Bosmere Junior School, this places it closer to the maximum walking distance of 2km identified within the CIHT's 'Providing for Journeys on Foot' document.

The Highway Authority therefore considers that the request complies with all of the relevant planning tests. Specifically in terms of the adjacent Persimmon Homes site it should be noted that a contribution to mitigate its highway impact

through a financial contribution of £150,000 towards improvement works at the Emsworth Road/Castle Avenue junction was secured which was considered a fair and reasonable approach. The Highway Authority remain satisfied that the mitigation requirements set out in respect of the current application are proportionate.

Bus Service Infrastructure

It is noted that the applicant has agreed to the principle of paying a contribution towards improving local bus infrastructure.

This will be discussed in more detail with the applicant once the position around the provision of the southwestern pedestrian and cycle link has been finalised and a full mitigation package from the site can therefore be reviewed.

Internal Layout

The applicant has confirmed that pedestrian visibility splays of 2m x 25m will be available to the west of Plot 2 into the Persimmon Homes site. A splay of 19.9m is available to the edge of the red line boundary of the site but given that access is required in this location, a 25m splay commensurate with HCC TG3 guidance will be provided subject to the applicant overcoming the current land constraints.

To ensure that no planting encroaches into visibility splays, the Highway Authority will seek a planning condition which restricts the diameter of tree trunks to no more than 550mm.

Drawing number 041.0039.003 Rev E provides visibility splays throughout the site. It is noted that there are a number of instances where forward visibility is still only shown to 17m, with no speed reduction measures in place to ensure vehicle speeds are below the 20mph design speed required through HCC TG3 guidance to achieve a 25m forward visibility splay. This point has been raised previously for the applicant to address, with no amendments to the design. To progress this matter further, a Departure from Standards will need to be progressed. In order for this to be undertaken, the applicant is required to provide tracking drawings (undertaken at a 10mph track speed) for a family car passing a dot com delivery vehicle around each bend subject to the reduced visibility. The Highway Authority will then be in a position to advise whether the departure is likely to be accepted.

Crossing Points

The crossing point to the south of the play area has been located further away from the access into Plot 178 and drawing number 041.0039.006 Rev A confirms that sufficient visibility is available from the crossing point.

Footway/Cycleway

The footway link to the west of the open space has been widened to 3m for cater for both pedestrian and cycle movements. The path ties into the remainder of the 3m shared use route which runs along the western boundary of the site.

It is noted that all footways within the adoptable highway will be 2m wide, which is considered acceptable.

The Highway Authority had previously asked the applicant to improve pedestrian and cycle permeability between the proposed development and the Persimmon Homes site by providing a connection into the adjacent estate. The HRN states that there are no opportunities to provide such a link; however, there appears to be space between Plots 164 and 165, Plots 171 and 172 or Plots 176 and 177 to drop pedestrians and cyclists into a parking court. This would require the reorientation/amendment to the property types in these locations, but there does appear to be opportunities to provide additional links. The provision of an additional link would reduce walking distances and increase permeability between the two sites, reducing the need to walk/cycle to the far northern or southwestern boundary. The Highway Authority therefore maintains that this link should be investigated in more detail.

Future Southleigh Connection

Drawing number PLN-1-1101 Rev N has been updated to highlight two potential locations for a pedestrian and cycle link onto the Southleigh link road, should this come forward. These links connect into a shared use path provided along the eastern boundary of the development which provides onwards connectivity to the rest of the site. The previous reference to a potential vehicular access point has also been removed from the site layout drawing.

The Highway Authority are now satisfied that sufficient provision has been made for future pedestrian and cycle connections into the Southleigh link road if this were to come forward. The S106 agreement will need to enable provision for connections to be made in the future where there would be required works within the site which may not form part of the adopted highway network. Rights to pass and repass should also be appropriately secured for the public to prevent issues arising with connecting the site into wider network in the future.

SuDS Access

Tracking for a vehicle undertaking maintenance of the of the SuDS has been shown in drawing number 041.0039.010.

Whilst it is noted that the vehicle will need to undertake a number of manoeuvres to access the pumping station, it is acknowledged that this is an infrequent event and is therefore considered acceptable.

Tracking

The HRN notes that Appendix F provides the tracking for a refuse vehicle tracking through the site at 10mph; however, the plan included in Appendix F relates to the SuDS management only. The applicant is required to provide

the tracking for a refuse vehicle travelling throughout the site for the Highway Authority to review.

Junction Modelling

Following the withdrawal of HBC's emerging local plan, the applicant has questioned whether the commitment to provide an improvement scheme at the A27 dumbbell roundabout remains valid.

As the HRN notes, the Land North of Cooks Lane development secured a proportionate contribution towards this junction to offset the impact of the vehicular trips generated by the site. The modelling work undertaken through this planning application demonstrated that mitigation was required when taking account of the future year modelling scenario and the additional development trips.

The junction modelling undertaken within the original Transport Assessment supporting the current planning application did not provide the RFC's across the roundabouts; however, given the position set out above, it is assumed that the trips generated by this site would further demonstrate the need for mitigation.

The wider work undertaken through HBC's previous emerging local plan is therefore slightly superfluous to the current considerations given that individual developments have demonstrated significant harm at the junction which requires mitigation. Any further work through future local plan modelling will need to take account of allocated developments to ensure that the identified mitigation scheme is suitable for accommodating the additional trips on the network, alongside any recently consented developments.

The proposed improvement scheme should therefore be classed as committed in terms of identifying a suitable scale of improvement to manage the highway impacts, unless this can be offset by alternative high quality sustainable transport provision to further reduce the reliance on the private car and therefore mitigate the development's impacts. In the absence of such provision, the Highway Authority will require a contribution towards the identified improvements at the Warblington junctions. Similarly, to the bus infrastructure contribution, the Highway Authority will engage in agreeing the contribution value once outstanding matters have been agreed.

Recommendation

There remains a number of matters set out within this response which needs to be addressed before the Highway Authority can make a recommendation on the application. If you are minded to determine the application in advance of this additional information Then the Highway Authority considers that the applicant has failed to satisfactorily address the previous comments. The Highway Authority would therefore recommend refusal for the following reasons:

Sustainable Transport Opportunities

In the opinion of the Planning Authority the proposal involves development that cannot be reconciled with the National Planning Policy Framework in that it would result in users of the development being unable to make use of sustainable transport opportunities. This would result in an overreliance on the private car which will create a severe impact on the local transport network and the environment and is contrary to NPPF 104, 110, 111, 112 and Hampshire County Council's emerging Local Transport Plan 4.

Travel Plan

In the opinion of the Planning Authority the proposal involves development that cannot be reconciled with the National Planning Policy Framework in that there is insufficient provision of, or support for, sustainable transport options. This will create a greater number of trips via private car which will create a severe impact on the local transport network and the environment and is contrary to NPPF 104, 110, 111, 112 and Hampshire County Council's emerging Local Transport Plan 4.

Access

In the opinion of the Planning Authority the proposal involves development that cannot be reconciled with the National Planning Policy Framework in that the proposed access are inadequate to accommodate the development safely. This would result in an unacceptable impact on the safety of users of the developer and adjoining highway contrary to NPPF 111.

Location

In the opinion of the Planning Authority the proposal involves development that cannot be reconciled with the National Planning Policy Framework in that it would result in a development that results in significant movement being located in area poorly connected to the sustainable transport options leading to an overreliance on the private car and is contrary to NPPF 104, 110, 112 and Hampshire County Council's emerging Local Transport Plan 4.

Vehicular Impact

In the opinion of the Planning Authority the proposal involves development that cannot be reconciled with the National Planning Policy Framework in that the significant movements generated could not be accommodated adequately on the existing transport network which would result in a severe impact on the road safety and operation of the local transport network which is contrary to NPPF 111.

I trust that the above is clear. Should you have any queries, please do not hesitate to contact Chris Hirst on the number noted above.

Yours Faithfully,

Gemma McCart – Transport Team Leader, Highways Development Planning.