

From: Hirst, Chris
Sent: 07 April 2021 14:30
To: Haywood, Daphney
Subject: RE: APP/21/00200 - Neighbourhood response to 'HCC Highways Consultee Response'

Hi Daphney,

Thank you for forwarding on the attached note.

You will note that the Highway Authority has queried the traffic distribution, overall level of traffic generation and requested junction modelling within our formal response. I understand that the discrepancies around the distribution are down to a typographical error within the TA which will be corrected by the applicant in any follow up transport documents.

The applicant has also been asked to review the on-site permitted uses to understand the existing levels of site operation which will help to inform the level of trips to be net from the proposed development. Once clarification has been provided on all of these points, the Highway Authority will be in a position to review the impact of the proposed development on the local road network.

I note the concerns regarding the rat-running of vehicles to the south of the site. To address the potential for rat-running, the Highway Authority would request that any permission should be subject to a planning condition for the applicant to supply an Operational Management Plan to restrict traffic movements to the south of the site and therefore rendering any vehicular routing to the south a breach of planning and an enforceable matter.

I hope that the above is helpful. Please feel free to give me a ring if you would like to discuss.

Kind Regards,

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1 Introduction

This document is a response to the Hampshire County Council Highways consultee response to planning application APP/21/00200, 32 New Lane. The HCC Highways document is an eight page letter, dated 24th March 2021 and written by Chris Hirst, which addresses in some depth some of the deficiencies displayed in the Transport Statement submitted with the application and authored by 'vectos.'

While I agree with much of the HCC response, it ignores the significant risks and impact of the 'intended occupier's clear intention to use existing residential 'rat-runs' for the routing of a significant volume of commercial traffic on a seven day a week basis.

This document addresses my immediate concerns with the HCC Highways response, including graphical representations of the traffic loading at key points in the network, using the best available data in the application document set.

In particular, it highlights five additional road junctions which must be considered, not just for the wellbeing of the residents but also for the safety of the many pedestrians and cyclists that use these same streets during peak hours. Aerial views of these key junctions are included towards the end of the document.

This document should be read in context with the HCC Highways document.

2 Comments in detail

2.1 Employment Figures

The failure to give any 'New Employment' figures in section 18 of the Application Form is probably deliberate. Noting that the HCC Highways response includes 'car' movements as well as 'LGV' and 'HGV', the document below shows **all** vehicle movements, showing the arrival and departure of on-site shift workers and fleet van drivers.

We can expect the applicant to make a last minute announcement of at least 1,500 jobs at the site, 650 of which will be site based workers on a three shift pattern (TA 4.6) and 850 delivery van drivers.

While this will be presented to Havant Borough Council as 'Good News', the confirmation of an additional 3,000 vehicle movements adds dramatically to the traffic predictions and **cannot** be ignored. While the circa 2,500 HGV and LGV traffic movements per day will severely impact the town centre traffic, it is probably not an exaggeration to state that the addition of 3,000 personal commuting vehicle movements will completely cripple it.

2.2 Hourly traffic distribution

There appears to be only a single source of data which can be used with reasonable accuracy to predict the impact of site freight traffic on the local road network. That data is the 'Occupier Traffic Data' at Appendix F of the Transport Statement, based on the 'Approved Sites' at Appendix G. This data, which gives the only clear reference point for freight traffic predictions, is re-displayed in the table in Section 5 of this document.

Staff personal vehicle movements are not included in the Transport Statement and can only be assumed from other data. Clearly the 866 delivery vans each need a driver, whose arrival and departure adds a further 1,732 traffic movements to the day. The shift workers in the warehouse we can assume occupy the 208 parking spaces, giving rise to a further 1,428 traffic movements at the site gates. These 3,160 'personal commuting journeys' must also be taken into account, especially when regarding the 'rat run' driving issues discussed in this document.

The Hampshire County Council Highways 'Consultee response' describes a pre-application agreement of the 'total trip generation' over a 'Peak Hour', the definition of which I cannot find. The combined traffic data shown in charts at 3.1, 3.2 and 3.3 below, shows two clear three-hour peak periods. This data shows an AM peak from 06:00 - 08:59 and a PM peak from 16:00 – 18:59. Reducing this data to a single undefined AM hour and a single undefined PM hour is unhelpful for anyone trying to understand the actual likely impact on the network.

Equally misleading is the lack of any clear admission that this would be a seven day a week operation, if not immediately then certainly shortly afterwards given that is the 'direction of travel' of the last mile proposition.

2.3 Routing discrepancies

In the Transport Statement, the Operational Vehicular Distribution percentages given in Tables 5.7 and 5.8 are at variance with each other and this has also been recognised at page 8 of the HCC Highways Consultee response. This is just one example of incomplete analysis in a document that clearly looks rushed for marketing rather than scientific purposes. The statement *"The occupier proposes to use the site as a 'last mile' distribution centre, where parcels are delivered via small vans to customers in the local area"* is deliberately misleading, repeated no fewer than three times throughout the document despite the fact that 95% of the deliveries will be outside of the local area. (See Transport Statement table 5.6)

It appears that Table 5.8 was inserted to cover points raised by HCC during the pre-application stage, while Table 5.7 betrays the real intention of the intended occupant. That intention is clear from the very description of the operation as a 'last mile delivery' hub.

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Van drivers will be incented to ensure that the quickest routing is taken in order to meet the business' 'delivery promise' to their end customers. Parcels must be delivered within the time slot given. To do this, particularly from a site landlocked on all four sides by residential property and starting from a location that at peak times can often be a significant journey time from the major arterial roads, the A27 and the A3(M), means that delivery drivers will inevitably route through residential 'rat-runs'.

This point is actually reinforced by the Transport Statement at section 5.2, which states *"In reality, vehicle distribution will be dictated by local demand and current traffic conditions which will cause route choices to vary day to day"*.

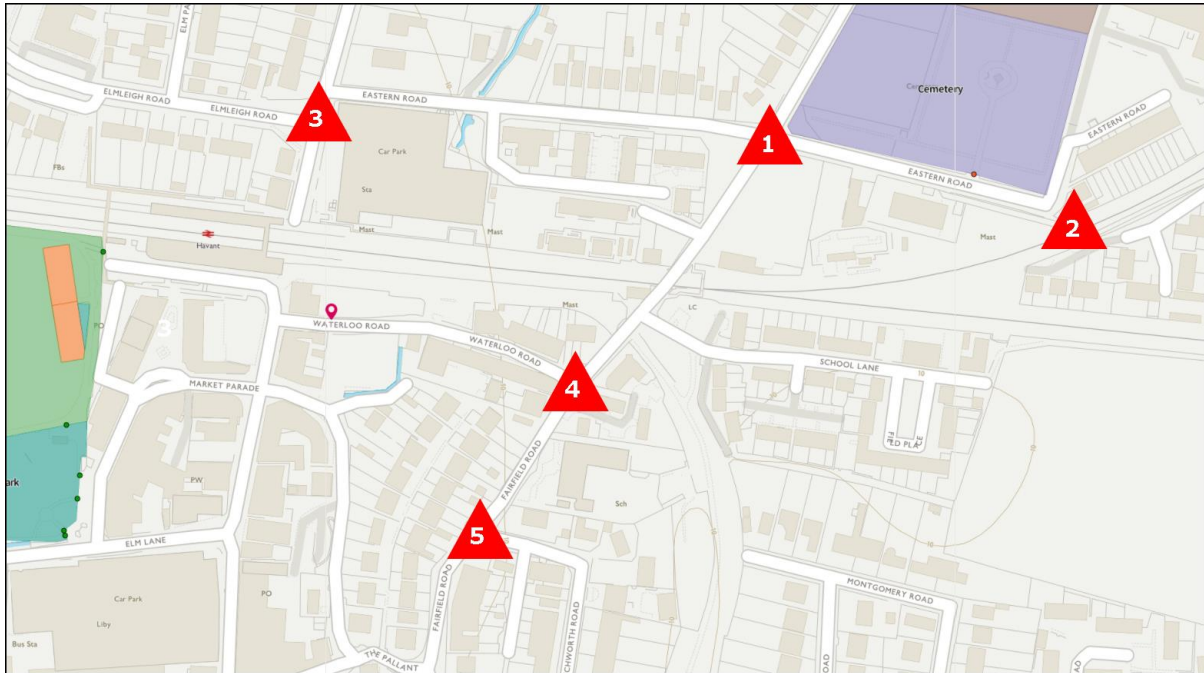
The rat-runs are well known by the residential population of Havant, as a matter of necessity given the inability of the town's main road infrastructure to handle peak time traffic conditions. While this is well known to the resident population, **it is probably insufficiently understood by Hampshire Highways or the external consultants employed by the agent to produce the Transport Statement.**

It should also be noted that over the period during which this assessment has been put together, traffic levels observed in the area have, due to Covid-19, been far from representative of normal conditions.

Recognising that the practical operation of such a site in the New Lane location will require exploitation of local rat-runs to meet customer expectations, it is notable that the list of additional junctions identified by HCC during the pre-application stage as the source for table 5.8 does **not** include the significant junctions covered at 2.4, below.

2.4 Junctions missing from analysis

None of the following junctions have been considered for detailed analysis of either the traffic or the risk of personal injury:



1. New Lane / Eastern Road junction
2. Eastern Road / Third Avenue / Kenwood Business Park junction
3. Eastern Road / Leigh Road / Elmleigh Road junction
4. Fairfield Road / Waterloo Road junction
5. Fairfield Road / Beechworth Road junction

Annotated aerial images of these junctions and the two 'rat runs' on which they occur are included at Section 4, below.

2.4.1 New Lane / Eastern Road – Junction 1

At this junction, Eastern Road has priority but New Lane has the predominant flow. As personally witnessed over the past thirty years, use of this junction has changed completely. Thirty years ago, when the Kenwood Business Park was a fully functioning manufacturing facility, the predominant peak time flow was along Eastern Road for manufacturing staff accessing the factory via the southern entrance to the Kenwood site. The New Lane entrance was restricted to 'management and visitors' only.

Today, the eastern side of this junction is effectively a cul-de-sac. The only commercial vehicle access needed is to the Network Rail materials storage site, with only a handful of movements in any one week.

Most recently, opening of the Station View apartments on the former Wessex site has removed virtually all commercial traffic from this junction.

2.4.2 Junction 2 - Eastern Road / Kenwood Business Park / Third Avenue

At the end of the cul-de-sac, the Kenwood Business Park entrance has not been in use for many years. There are a number of residents' vehicles feeding into this junction from Eastern Terrace, but the significant traffic is the **high volume of pedestrian and cycle traffic** making use of the ramped bridge from Third Avenue as their direct route to Havant Station, to the local schools, and to the National Cycle trails. While not specifically a 'junction' for this analysis, it is nevertheless a significant source of pedestrian and cycle traffic into Junction 1 at 2.3.1.

This pedestrian footfall and cycle traffic represents a high risk of accident, particularly given that cycle traffic assumes, correctly, that they have priority over New Lane vehicular traffic whereas southbound New Lane 'rat-run' traffic does not expect this volume coming from their left.

The cul-de-sac also provides the only vehicle access to the town cemetery and to the Holocaust memorial.

2.4.3 Junction 3 - Eastern Road / Elmleigh Road / Leigh Road junction

This staggered 'dog-leg' junction is extremely busy throughout the peak periods from 06:00 - 09:00 and from 16:00 – 19:00. The northern pedestrian entrance to Havant Station and the vehicle entrance to the two-decked Station Carpark is from the southern side of Leigh Road. The northern side of Leigh Road services the Oak Park medical facilities, also accessible from Crossland Drive.

The staggered nature of the east/west route between Eastern Road and Elmleigh Road results in vehicles regularly cutting what, in the case of Eastern Road, is a blind corner. Cars waiting to pick up passengers from the station regularly use the eastern kerb of the junction to park temporarily, further impacting east west flow through the junction. In times of normal traffic, large articulated multi-axle trucks travelling to the New Lane premises following sat-nav rather than the advisory signage, or simply avoiding the traffic lights on the Petersfield Road, attempt to negotiate this dog-leg with difficulty.

2.4.4 Junction 4 - Fairfield Road / Waterloo Road

South of the New Lane level crossing, the carriage width at the Waterloo Road junction is very narrow, with a blind, acute angled turn into Waterloo Road. This whole area is very heavy with parents and small infants during peak school hours accessing Fairfield Infants School. The junction is dangerous for vehicles at all times of the day given the poor visibility and the need to cross the centre line of Fairfield Road during a turn in from Waterloo Road.

2.4.5 Junction 5 - Fairfield Road / Beechworth Road

The turn from Fairfield Road into Beechworth Road has limited visibility in both directions, and at peak times is heavily used 'illegally' parked passenger vehicles pickling up and dropping off children to both Fairfield School and Glenhurst Nursery School.

2.5 Traffic Modelling

2.5.1 Relevance of TRICS data

Given the nature of Havant Traffic and the unique constraints of the town's road system, I question the applicability of TRICS traffic modelling to aid predictions of loading. I note that the author of the Transport Assessment also acknowledges that *"There is no suitable information available in the TRICS database"* for a 'last mile' business model on this site. This, however, does not prevent the author from continuing to present as fact, content in tables derived from TRICS.

2.5.2 Comparison with APP/19/00660 – 'Buttericks' site

I also raise concern with the statement on Page 7 of the HCC Highways Response that *"comparison has been drawn against the distribution agreed through the nearby planning application at 38 New Lane (APP/19/00660). It is noted that the distributions are comparable..."*

While the two sites are near neighbours on the site, the traffic movements associated with the businesses operating from those sites would bear no comparison.

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3 Analysis of freight and staff vehicle movements

In this table:

'Goods vehicles' data is taken from Transport Assessment (TA) Appendix F, 'Occupier Data'

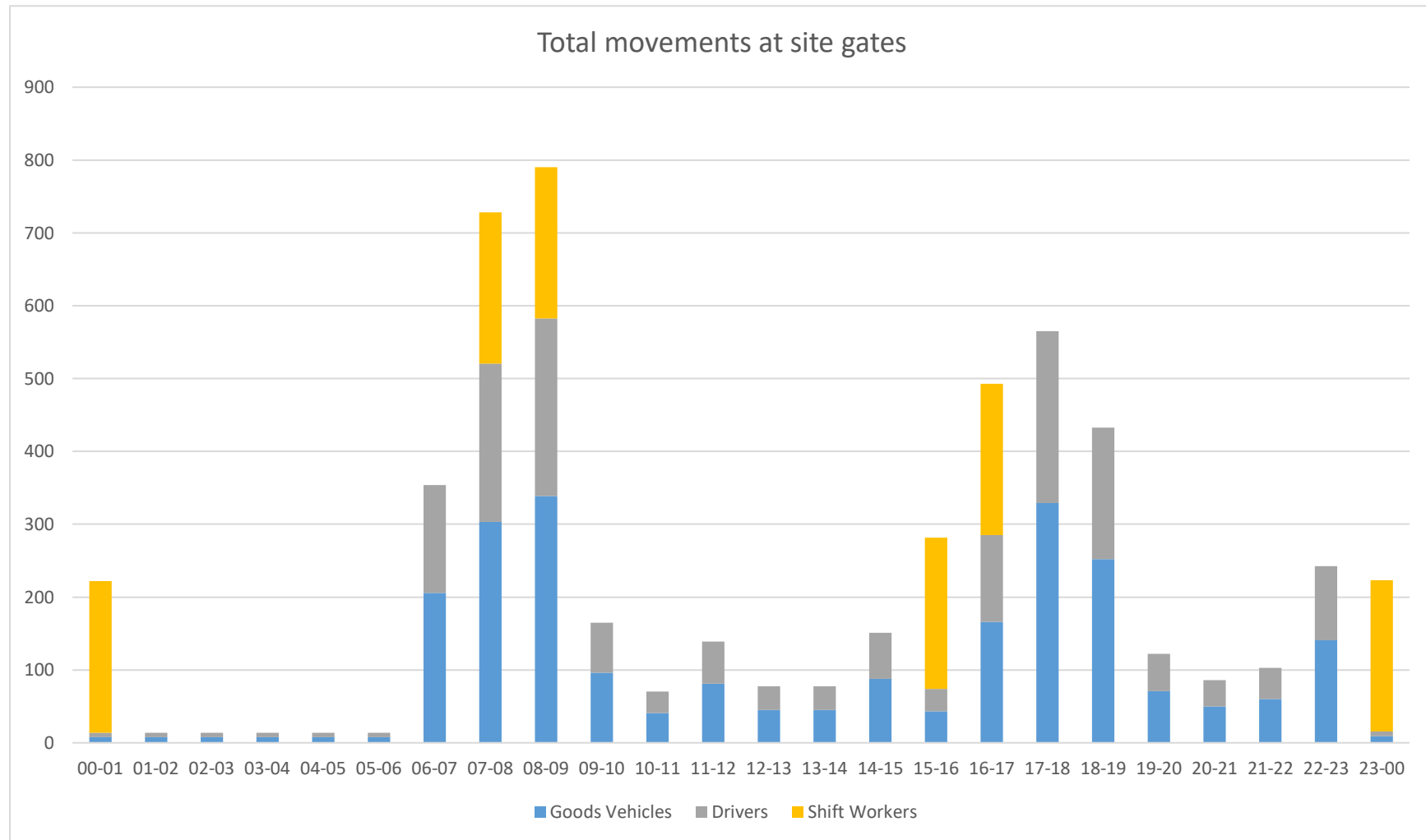
'Drivers' assumes 866 drivers arriving for duty and returning home, spread according to supplied Goods Vehicle movements

'Shift Workers' assumes 3 shift pattern (TA 4.6) and 208 workers per shift. Drivers park their own vehicles in van storage area (TA 4.7)

Hour	Goods Vehicles	Drivers	Shift 1	Shift 2	Shift 3	Shift Workers	Movements at gates	29% Movements	70% Movements
00-01	8	6	0	208	0	208	222	64	155
01-02	8	6	0	0	0	0	14	4	10
02-03	8	6	0	0	0	0	14	4	10
03-04	8	6	0	0	0	0	14	4	10
04-05	8	6	0	0	0	0	14	4	10
05-06	8	6	0	0	0	0	14	4	10
06-07	206	148	0	0	0	0	354	103	248
07-08	303	217	208	0	0	208	728	211	510
08-09	339	243	0	0	208	208	790	229	553
09-10	96	69	0	0	0	0	165	48	115
10-11	41	29	0	0	0	0	70	20	49
11-12	81	58	0	0	0	0	139	40	97
12-13	45	32	0	0	0	0	77	22	54
13-14	45	32	0	0	0	0	77	22	54
14-15	88	63	0	0	0	0	151	44	106
15-16	43	31	0	208	0	208	282	82	197
16-17	166	119	208	0	0	208	493	143	345
17-18	329	236	0	0	0	0	565	164	396
18-19	252	181	0	0	0	0	433	126	303
19-20	71	51	0	0	0	0	122	35	85
20-21	50	36	0	0	0	0	86	25	60
21-22	60	43	0	0	0	0	103	30	72
22-23	141	101	0	0	0	0	242	70	170
23-00	9	6	0	0	208	208	223	65	156
	2413	1732	416	416	416	1248	5393	1564	3775

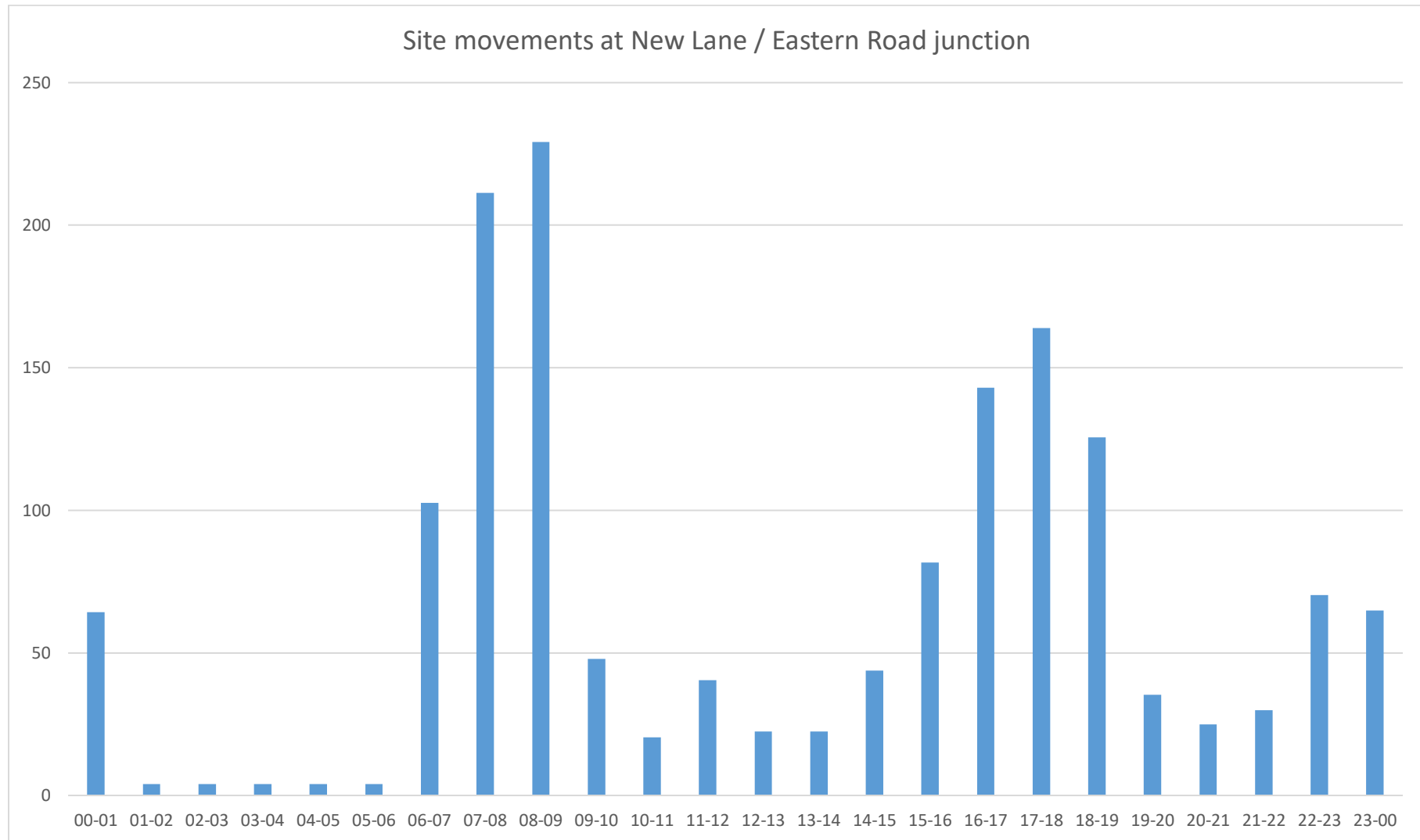
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3.1 Traffic movements at site entrance over 24 hour period.



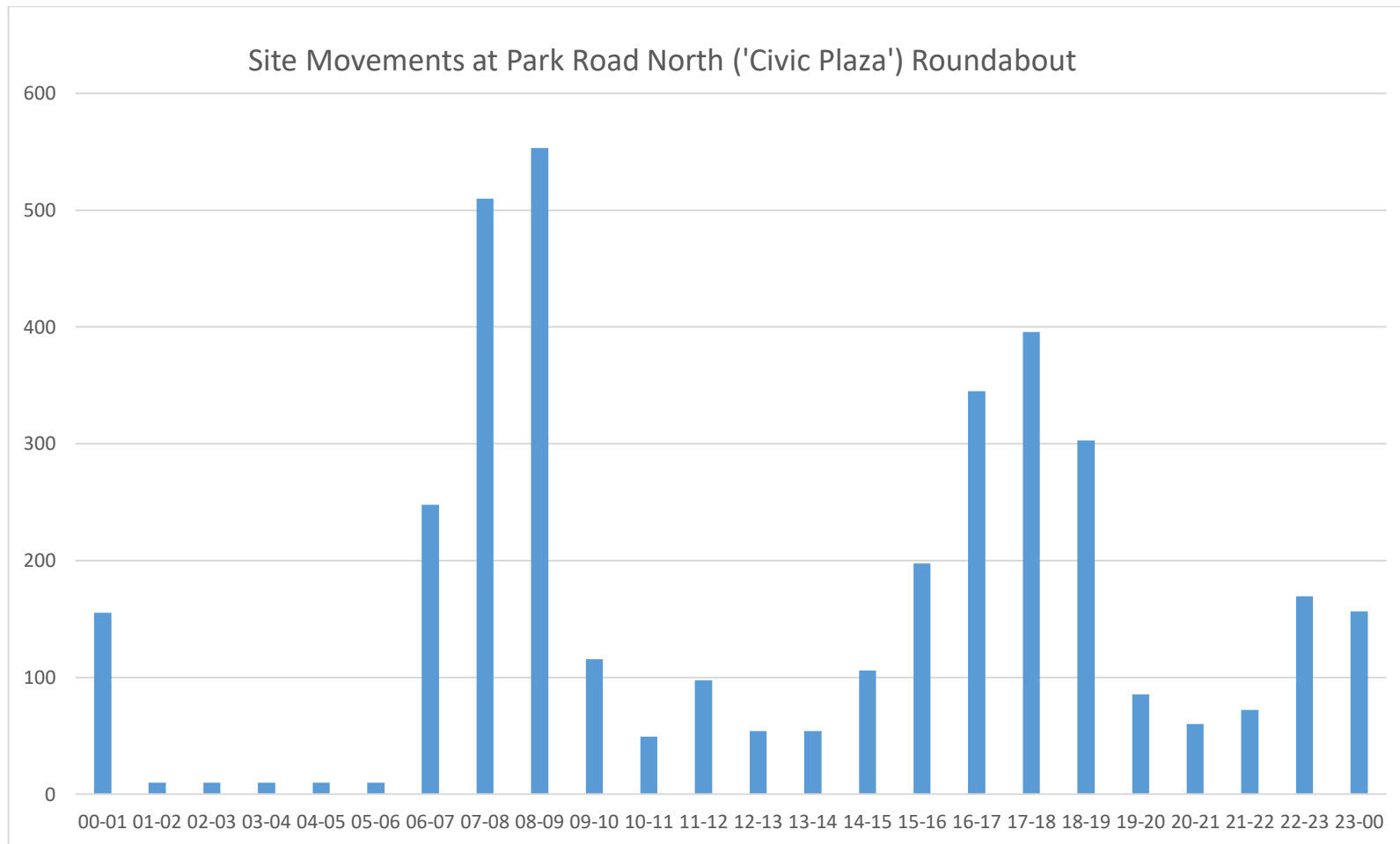
3.2 Site traffic expected through New Lane / Eastern Road junction

Assumes routing at 29% of loading at site gates – From Transport Statement table 5.7



3.3 Site traffic at Park Road North – Civic Plaza Roundabout

Assumes routing at 70% of loading at site gates – From Transport Statement table 5.7



4 New Lane site – 'Rat-run' context

Because of its 'landlocked' geographic context, the New Lane employment site inappropriate for a business which demands quick access to the major arterial roads. For northbound vehicles, exit is likely to be via Bartons Road toward Whichers Gate and the A3(M) at J2. For drivers heading east of Chichester, the route via Funtington and East Ashling will avoid the A27 Chichester roundabouts while for either A27 direction, if the New Lane level crossing is open, the Warblington interchange will be used rather than joining the queue at Park Road North.

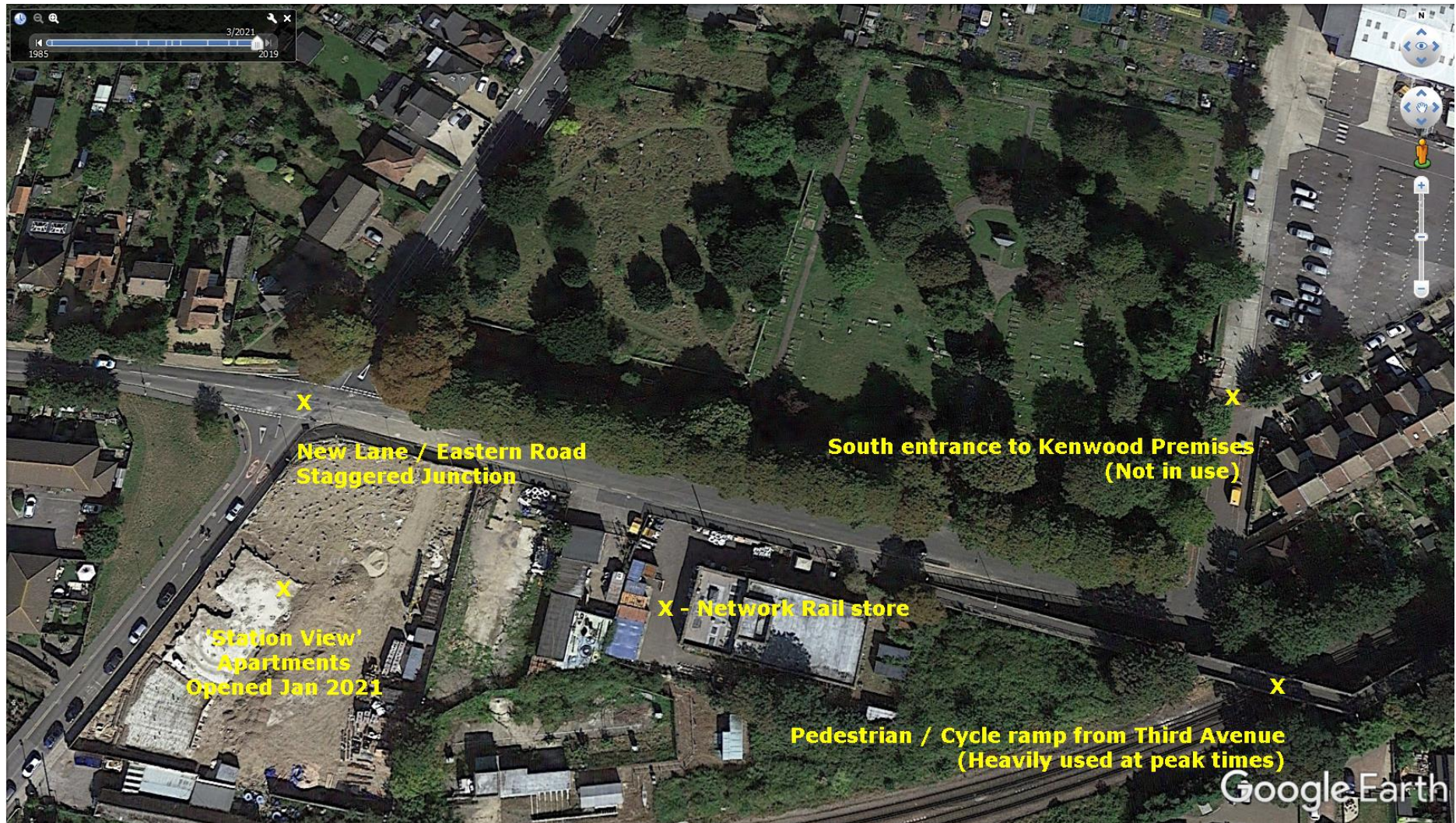


4.1 New Lane South, Eastern Road, Elmleigh Road, Park Road North

This rat run has been in regular use for many years, reinforced by the set of five traffic signals on the B2149 Petersfield Road. While it may understandably alleviate the pain for private car drivers, its use by commercial drivers should be actively discouraged by weight restrictions and traffic calming measures. Traffic from the employment business sites should be conditioned away from this route and the long standing B2149 / Park Road peak traffic issues must be addressed.



4.2 New Lane / Eastern Road junction – towards the Eastern Road cul-de-sac and foot/cycle ramp to Third Avenue



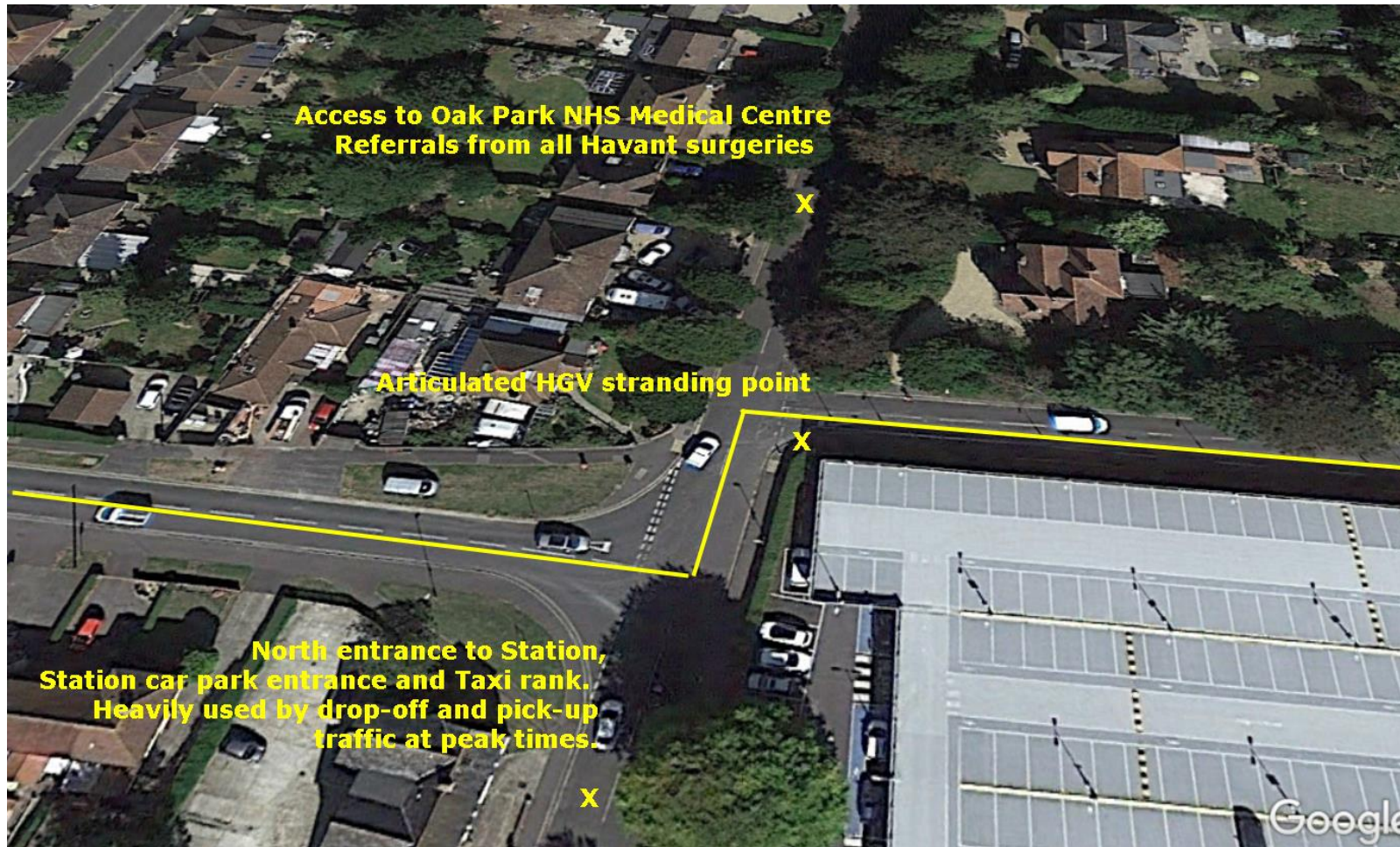
4.3 Heavily used pedestrian bridge with cycle ramp from Third Avenue to Eastern Road

This route, while a vehicle cul-de-sac, is heavily used by pedestrians and cycles, being the major rout into the town centre from the large Denvilles residential population.

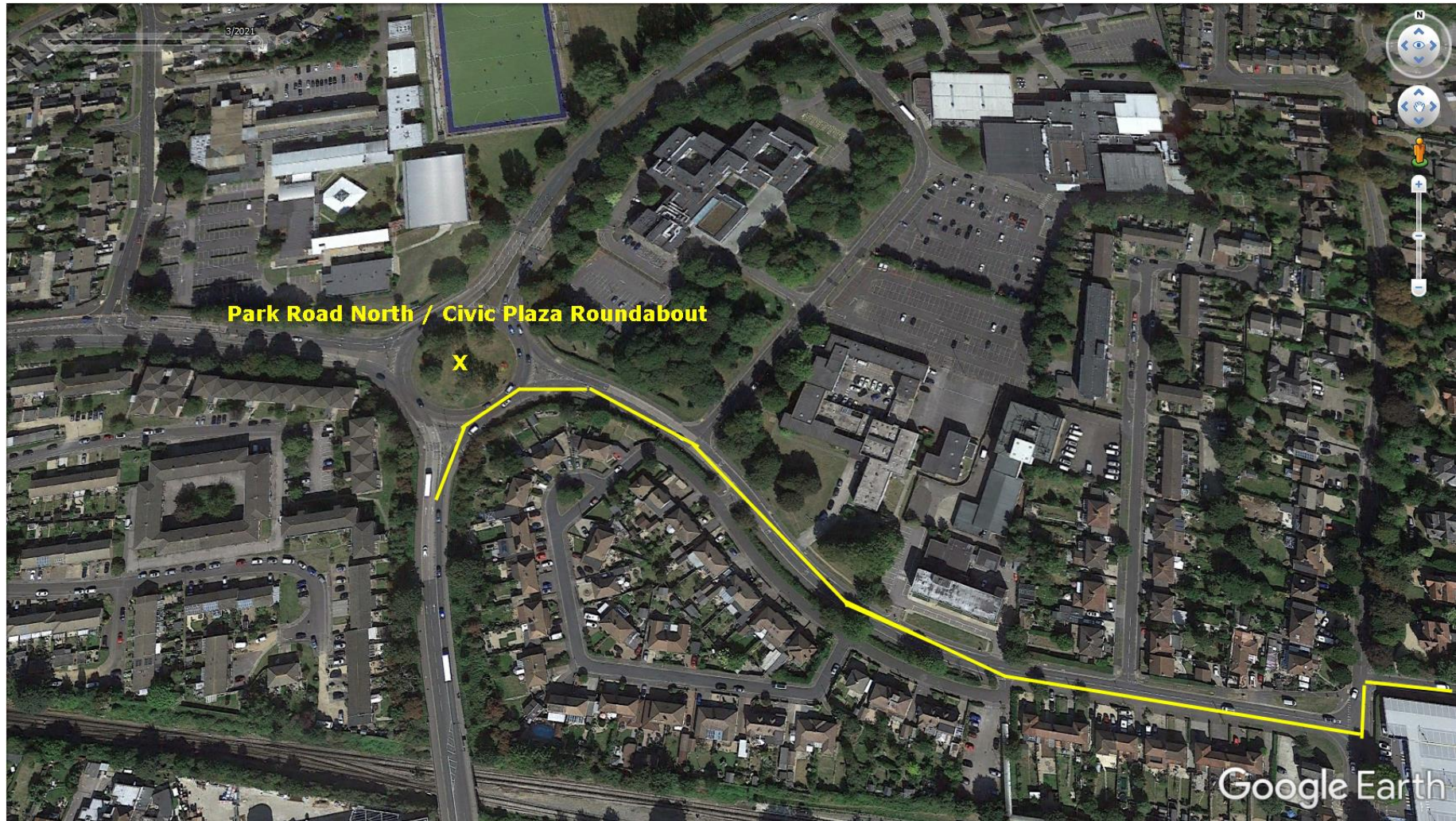


4.4 Eastern Road – Leigh Road – Elmleigh Road staggered junction

This junction is notorious for near misses and poor driving behaviour. Particularly for continental multi axle articulated vehicles which regularly enter this route through sat-nav direction. Much better signage is required at the Park Road North roundabout to divert such traffic back to Crossland Drive.



4.5 Elmleigh Road – Park Road North at the Civic Plaza Roundabout



4.6 New Lane Level Crossing, Fairfield Road, Beechworth Road

The route across the New Lane level crossing runs past both Fairfield Infants School and Glenhurst Nursery School. In doing so, it crosses the Hayling Billy track, a popular walking route and a national cycle trail.



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East Street, Emsworth Road, A27 East and West

