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Enquiries To Alistair McMurray

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Date 9 April 2021

My reference 031419

Your reference APP/21/00189

Email havantdc@hants.gov.uk

Dear Lesley ,

Brockhampton West, Harts Farm Way, Havant

Outline application for the development of new employment units to provide up to 29,000 sq m (gross internal area) for flexible use across use classes E (light industrial), B2 and B8 with ancillary offices, car parking, service yards, drainage works, landscaping and associated works to prepare the site for development. All matters are reserved except the primary means of access to the site.

Preamble

The above proposal forms an outline planning application with all matters reserved other than for means of access.

The application is supported by a Transport Assessment (TA) (Vectos – February 2021). In line with this, the following comments relate solely to the principle of the proposal as based upon the contents of the submitted TA and means of access only.

Internal layout and all other matters will be subject to relevant reserved matters application(s) coming forward should any planning permission to this outline proposal be granted by the Local Planning Authority (LPA).

This proposal has been subject to pre-application discussions with Highways Development Planning (HDP) in its role as representatives of the Local Highway Authority (LHA). The applicant submitted a Transport Scoping Note (TSN) in

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September 2020 and a response was subsequently provided by the LHA on 6th October 2020.

Pre-Application Response

Prior to the application coming forward, the application team engaged in pre-app discussions with the LHA and subsequent to the submission of a TSN a response was provided which included the following salient information:

1) Footway/Cycleways

The applicant was advised that any future TA would need to consider how any future development would tie into the existing PROW. The existing PROW is considered to be a good quality sustainable travel connection between the site and the residential area of Bedhampton and that the applicant should engage with HCC Countryside Services to determine how any future development could improve this route.

It was considered that any future application would need to consider an additional pedestrian/cycle crossing point of Harts Farm Way which would avoid the need for pedestrians and cyclist to cross at the junction of Harts Farm Way and the strategic network of the A27.

Footway/Cycleway provision was not included on pre-app plans for the northern flank of Harts Farm Way and the applicant was required to consider how this could be accommodated within any development proposal coming forward.

It was considered that the scheme presented at pre-application stage was lacking in sustainable travel provision and not aimed at providing a particularly high or even good quality of pedestrian/cycle accessibility and that pedestrian activity arriving from the east would have to travel a significant length of Harts Farm Way in order to access the site.

2) Public Transport

It was identified that access to public transport provision was at the upper reaches of comfortable pedestrian access and it was requested that any future Transport Assessment identifies measures in which to promote and encourage the use of sustainable transport facilities in the local area.

In addition, a walking and cycling audit was required to be undertaken to establish where deficits in local infrastructure could prevent sustainable travel to and from the site.

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3) Car Parking

An assessment of parking was requested for both B1(c) and B2 uses if these were to come forward above the assessment of B8 given the higher quantum associated with these use classes. Depending upon the results, the Highway Authority may request at TRO along Harts Farm Way in order to prevent any overspill upon the public highway network.

4) Site Access

Following assessment of the access provision presented at pre-application stage it was conformed that any application coming forward would need to fully assess proposed access dimension, junction radii, include a Stage 1 Road Safety Audit and appropriate Designer's Response, vehicle tracking for two pantechicons passing at the eastern access, tracking for the most onerous vehicle sizes utilising the western access (including estate cars passing) along with speed surveys in compliance with HCC's Technical Guidance Note 3 in order to inform actual vehicular visibility requirements.

5) Trip Generation

Trip rates and associated methodology were agreed at pre-application stage and two-way trip rates of 117 and 82 movements in the AM and PM peak hours respectively were agreed in regard to B1(c) land use with 124 and 82 movements respectively for the AM and PM peaks for the proposed B2 use.

Importantly, it was noted that any B1 office provision that was stated as being ancillary to the main use had not been accounted for in the above trip rates and as such this had not been agreed and any assessment coming forward would need to appropriately consider this use.

6) Traffic Distribution

The distribution of traffic from census data was from Havant 018 MSOA was proposed and in order to ensure that the data was specific to the site location it was stated that Havant 018F MSOA should be utilised.

Detailed trip assignment/distribution diagrams were stated as being required in order to fully assess impact upon local junctions for the routes identified in the Transport Scoping Note.

7) Traffic Assessment

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Given the flexibility of the land use(s) as presented within the TSN, it was confirmed that the worst-case scenario utilising B2 trip rates were required for junction modelling.

It was noted that given the possible changes to trip assignment it was not possible to fully confirm which junctions should be subject to operational assessment, however from the broad trip assignment presented within the TSN this would include the A3/A27 “Teardrop” junction along with the “Rusty Cutter” roundabout.

It was also stated that given the COVID-19 situation at the time (October 2020), traffic surveys were/are being approached on a site by site basis.

It was stated that whilst traffic flows had been steadily increasing, it was uncertain whether recent government announcements would reduce traffic flows again.

It was therefore considered that traffic surveys should be undertaken at Harts Farm Way, the A3/A27 teardrop junction and Rusty Cutter roundabout to understand the current flow levels.

Sensitivity testing could then be applied to each of these junctions by considering data from the Forty Acre Farm application (planning reference APP/18/00450) and uplifting these flows with TEMPRO data.

Should the traffic survey flows be similar to the TEMPRO uplifted data then they could be considered robust, otherwise the flows may need to be uplifted to match the TEMPRO data.

It was stated that once traffic surveys had been undertaken and the flow levels agreed, modelling should be undertaken for the aforementioned junctions.

The Highway Authority would expect to see the following scenarios modelled:

- 2020 with and without development traffic;
- 2025 with and without development traffic; and
- 2030 with and without development traffic.

With both the ‘with and without development’ scenarios provided it would be possible to ascertain the development impact at both of the junctions.

It was considered that this approach may need to be taken to further junctions if the revised distribution assessment required it.

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Application Site and Context

The application site is located to the south-west of Havant and Bedhampton on vacant land reclaimed land previously utilised for refuse/waste landfill purposes.

Access to the site is currently taken from a simple priority junction with Harts Farm Way broadly to the centre of the site.

Three separate illustrative site layout plans have been provided, however regardless of internal layout options, all three share the same proposals for means of access.

The local highway network to the site consists of the Harts Farm Way to the 4-arm roundabout junction to the east forming a junction with Brockhampton Road, Brookside Road and Southmoor Lane, along with the strategic network of the A27 and A3(M) which junctions with the A2030 Havant Road and Bedhampton Hill at the “Rusty Cutter”/Bedhampton Roundabout.

Site Accessibility

Currently there are two forms of pedestrian access to the site, firstly via the existing vehicular access and secondly via the footbridge to the north across the A27 which runs through the site and links up with the existing vehicular access in a generally northeast to south westerly direction.

Externally to the site, a dual footway and cycleway is provided along the southern flank of Harts Farm Way and runs the entire length of the site and beyond to both the north and the east.

This shared provision links up with a dedicated informal pedestrian crossing point of Harts Farm Way at the “tear drop” junction with the A27 to the west of the site and to the further commercial/industrial area to the east.

At this crossing point a small section of footway leads to the north and northeast along the northern flank of the site. There is no pedestrian/cycle footway provision along the northern flank of Harts Farm Way to the south and west of the site.

Wider to the site there are footways and cycleways which link the site location to the residential area of Bedhampton to the north across the A27.

The application site is not considered to be particularly well served by footway/cycleway provision in the context of the site being development for the intended use.

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In addition to this, the application site is not considered to be particularly well served by public transport services with the nearest bus stop being circa 1km walk distance away situated upon the A2030 Havant Road to the northwest of the site, however a number of peak hour services are available at an equal or better than 2 services per hour provision to significant local areas.

Walking and Cycling Audit

An audit of six agreed walking and cycling routes to/from the application site has been undertaken. The audit has not identified any deficits.

The Highway Authority however does consider that the existing pedestrian crossing at the western portion of Harts Farm Way is potentially inadequate not sufficient to serve the proposed development of this size and that persons will have to travel and unreasonable and unlikely distance to cross at this point.

The proposed development is required to undertake further review of this provision and to propose improvements in this regard.

The proposed development is not also considered to have adequately assessed how the proposal will link and tie into the existing PROW (route 30). The application is expected to offer assessment and improvements to what is considered to be a significantly important pedestrian linkage to the site from the Bedhampton residential area

PIA Data

Personal Injury Accident (PIA) data has been obtained from Hampshire Constabulary for the most recent 5-year period available at the time of publication of the submitted TA (May 2015 – May-2020).

The results of the data are presented in tabular format within the TA and the raw data obtained is provided within Appendix D.

Whilst the data does confirm a not insignificant volume of accidents, the information would suggest that there were no specific clusters in proximity to the application site or any apparent causal factors cited in regard to the public highway network.

That being said, the PIA assessment should plot the accident data onto a relevant highway plan or order for this office to fully appraise the data. This should be provided within a TA addendum for appropriate review before it can be considered that there are no existing accident trends that this proposal would likely exacerbate.

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Proposed Development

The outline application puts forward three illustrative layouts for one-, two- or three-unit schemes resulting in the following:

- One Unit Scheme – 28,392sqm (GIA)
- Two Unit Scheme – 27,985sqm (GIA)
- Three Unit Scheme – 27,471sqm (GIA)

Policy Compliance

The submitted TA is provided with a Policy Context review which includes for the National Policy citing the NPPF and NPPG.

Regional Policy includes for the Hampshire Local Plan 3 and Local Policy relating to the Havant Borough Core Strategy, The Havant Borough Local Plan (Allocations) and the Draft Havant Borough Local Plan along with the Havant Borough Council Parking Supplementary Planning Document which dictates HBC's adopted parking standards as appropriate for this development proposal.

The Policy Context review alludes to the proposal being policy compliant at national, regional and local levels and is demonstrated as such within the submitted TA.

Following review, it would be concluded that the proposal does broadly fall under a policy compliant scheme noting that within the Havant Allocations Plan, the site is allocated for 23,400sqm of new manufacturing or warehousing floorspace and whilst the proposal would fall above this quantum the changes for the Inspector to consider as part of the Examination of the Local Plan state that the allocations should be set as "about" rather than maximum or minimum levels of floorspace.

Access Strategy

Irrespective of development quantum, all three illustrative schemes provide two points of vehicular access to the site with the primary access servicing the operational facility to the east on off of Harts Farm Way with a secondary access to the west.

The existing access to the site will be removed as part of this proposal which is supported.

Regardless of the three illustrative schemes presented, the submitted assessment provides an appraisal of vehicular visibility within the body of the TA demonstrating that visibility splays of 2.4m x 43m can be achieved at the primary site access in line with

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the guidance as set out within Manual for Streets (MfS). This corresponds with the Appendix B of the plans submitted with the pre-application enquiry.

The corresponding plan however as presented within the TA at Appendix E is contrary to the body of the TA where it provides vehicular visibility splays at both the eastern and western accesses of 2.4m x 59m and 67m based upon an anticipated speed of 35mph and 38mph respectively.

The above visibility splays however are not referred to within the body of the TA. Section 4.7 of the submitted TA states that "Following discussions with HCC it was agreed that the required visibility splays should be provided in accordance with observed speeds on Harts Farm Way".

This is considered to be inaccurate and insufficient in terms of assessment. The provided pre-application response is explicit in its guidance that speed surveys were required to be undertaken in compliance with HCC Technical Guidance Note 3 in order to inform the visibility requirements for the proposed accesses.

This is missing from the assessment and the applicant is required to undertake suitable speed surveys in order to determine 85th %ile wet weather speeds for vehicular visibility requirements.

Given the current Covid-19 pandemic and its impact upon traffic volumetric and speed data, the required speed survey methodology would need to be discussed and agreed with the Highway Authority prior to the surveys taking place.

Notwithstanding the above further significant concerns in regard to the proposed access strategy are raised. In line with the requirements of HCC Technical Guidance Note 18 and explicitly referred to with the corresponding pre-application enquiry, any application coming forward was/is required to be supported by a Stage 1 Road Safety Audit and corresponding Designer's Response.

The required Stage 1 RSA is missing from the assessment and the applicant is required to have this undertaken in line with TG18 and this along with the appropriate Designers' response should be submitted for review.

In regard to the access strategies as proposed, the submitted TA is supported by vehicle tracking swept path analysis at Appendix F.

Vehicle tracking has been provided for the access, service yard and car parks for illustrative options.

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Drawing 205465/AT/A01 revC provides tracking for a max legal 16.5m articulated vehicles traversing the site access for both ingress and egress manoeuvres for left turns and this has been demonstrated as being able to be achieved in a safe and efficient manner.

Drawing 205465/AT/A01 revC also demonstrates internal traverse manoeuvring and turning with associated HGV bays which again is considered to be acceptable.

Drawing 205465/AT/A02 revC demonstrates vehicle manoeuvres for a standard design vehicle of 4.8m in length for access, egress and turning and parking within the site.

Whilst considered to be acceptable on face value, the pre-application enquiry response required an estate car to be tracked and as such this vehicle tracking should be provided with a design vehicle of at least 4.9m in length.

Similar vehicle tracking for the additional illustrative site layouts is provided in Drawings 205465/AT/A03 revC, 205465/AT/A04 revC, 205465/AT/A05 revC, 205465/AT/A06 revC, 205465/AT/A07 revC and 205465/AT/A08 revC.

These are considered to be broadly acceptable subject to the details above for design vehicle however there are some notes of concern which are required to be addressed.

It is noted that no tracking has been provided for max legal 16.5m articulated vehicles for right turns into and out of the site and this is required.

Drawing 205465/AT/A08 revC shows an HGV parked adjacent to a row of perpendicular car parking spaces. It is questioned with an HGV in this position as to whether a vehicle could park in these bays in a safe and efficient manner. Clarification is required in this regard.

Parking Provision

Given that the application is provided as outline with access only to be considered detailed parking provision comments are provided as illustrative only based upon the illustrative layouts as presented within the TA.

HBC will need to determine in their capacity as local parking authority that the level of parking provision proposed falls in line with adopted standards, however a review is provided below:

For the purposes of the TA, parking provision has been based on a development which is for solely B8 use and would fall broadly in line with minimum adopted standards.

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Clearly any reserved matters applications that come forward in the future post any planning permission that may be granted will be required to provide parking standards fully in line with HBC adopted standards and any departures from standards would need to be stringently assessed along with any proposals to prevent parking on the public highway, specifically Harts Farm Way.

Servicing

Given the outline nature of the proposals, servicing has already been covered in these comments in regard to vehicle tracking.

Parking provision requirements for max legal 16.5m HGV vehicles will be required in line with HBC adopted standards.

Travel Plan

A framework Travel Plan has been provided at this stage which is considered to be broadly acceptable given the outline application status.

A suitably worded condition will be attached to any planning permission that may be granted requiring a full Travel Plan to be provided in accordance with a full development quantum application for reserved matters and would be subject to review by HCC's Travel Plan Team.

A full Travel Plan would be expected to set targets for achieving a reduction in single occupancy car trips and robust monitoring procedures, however, is likely to be flexible in its design given any potential future restrictions imposed by the UK Government of the time in relation to Covid-19 or other similar situations.

Early engagement with HCC in that regard would be recommended.

Traffic Generation

In order to determine likely traffic generation, the submitted TA utilises a "worst case" scenario of 29,000sqm (GIA) broken down by trips associated with the potential land uses being E, B2 and B8.

B1a has been omitted citing its ancillary use to the above and assumed to be included within TRICS.

In order to determine trip rates, the TRICS database has been interrogated to form an appropriate data set for extrapolation of trip rates for E and B2 uses.

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The TRICS data has been reviewed and is considered to be sufficiently representative for E and B2 uses and would equate to the following:

- Use Class E – 146 two-way AM Peak and 102 two-way PM Peak
- Use Class B2 - 155 two-way AM Peak and 102 two-way PM Peak

In regard to B8 trip rates it has been deemed that TRICS does not provide sufficiently representative sites for comparison and as such a specific single site has been surveyed (TNT Dartford) given its similar characteristics to the proposed development.

Whilst it is not considered to be completely comparable, assessment of TRICS for sites available would point to the trips rates being generally representative and as such is considered to be acceptable for use within the assessment on face value.

A concern does exist however, that whilst utilising a development Quantum of 29,000sqm as a worst-case scenario, three potential options have come forward as illustrative layouts and the traffic generation of the assessment does not directly reflect this in that the TA would suggest the likelihood of a mixed use site coming forward.

With that in mind, the following comments are based upon the information as submitted within the TA, however for assessment purposes at outline stage the assessment is considered to be deficient, and a TA Addendum should be supplied that provides a traffic generation sensitivity assessment that a range of development quantum of the proposed land uses.

This is considered to be a more appropriate approach to determining likely development quantum impacts.

A further concern is provided in regard to the assessment of any B1 being ancillary to the overall quantum. The amount of B1 floorspace will ultimately be a determining factor as to whether its is considered ancillary to the overall quantum or not.

As such the above required sensitivity test also needs to include for a range of B1 floorspace for each illustrative option.

Clarification as to whether the site is available for parcel distribution services will also be required by the applicant. If this is to remain a possible option it may well require its own assessment in line with the sensitivity tests defined above owing to the differences in trip rates throughout the day/24 hour period and not just AM Peak/PM Peak/Daily trip rates.

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Trip Assignment and Distribution

In order to derive trip assignment across the local highway network, 2011 census origin-destination data has been utilised within the TA.

This was provided at pre-application stage using MSOA Havant 018, HCC advised that traffic should be assigned by using LSOA 018F given that this reflects the actual site location.

Investigation by the applicant suggests that the lower layer data is not available and given the route choose queries provided at pre-application stage, census data for the neighbouring Havant 014 has been used.

In principle this is considered to be acceptable given that Havant 014 does contain Langstone Technology Park and Solent Retail Park, however in the required TA Addendum a further sensitivity test against the trip assignment utilised should be provided giving a comparison between the differences for trips assigned using Havant 018 and Havant 014. This can then be reviewed and confirmed as being acceptable to the Highway Authority.

In line with the assessment of this proposal throughout, the following operational assessment review comments are based in-principle against what is provided within the TA for trip assignment across the network.

Operational Highway Assessment

Highway Network of Interest

The submitted TA determines that the highway network of interest forms the following junctions:

- A27/Harts Farm Way (Teardrop) Roundabout;
- Rusty Cutter Roundabout
- Proposed Site Accesses

As detailed above, based upon pre-application discussions and the trip assignment exercise provided within the TA this is considered acceptable in principle, however this would need to be finally determined based upon the results of a trip assignment sensitivity test to be provided with an Addendum TA.

Baseline Data

Given the existing Covid-19 situation the submitted TA has determined that it is not possible undertake traffic surveys that would be representative of “normal” traffic

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conditions prior to the pandemic and as such has utilised baseline data from the consented Forty Acres Farm development to the northwest of the site.

Whilst in-principle this may be considered acceptable, the Highway Authority confirmed at pre-application stage that survey data was/is being considered on a site-by-site basis and it was considered that traffic surveys should still be undertaken upon the highway network of interest in order to understand current baseline traffic levels.

Sensitivity testing could then be applied to each of the junctions by considering baseline data from the Forty Acres Farm development and uplifting these flows with TEMPRO data. Should the uplifted data be similar to the surveyed data then they could be considered to be representative and robust.

Once these surveys had been undertaken and flow levels agreed, modelling could then be undertaken.

This approach appears not to have been followed and the assessment simply identifies the Forty Acres network peak and has applied the proposed development peak to the same timeframe.

This is not considered to be a fully robust methodology and in order to fully assess the baseline data the above approach still needs to be followed. Again, this will need to be undertaken and covered within an Addendum TA.

Similarly, in line with the assessment of this proposal throughout, the following operational assessment review comments are based in-principle against what is provided within the TA for baseline data and comments are provided on face-value in this regard.

Traffic Growth

Caveated against the baseline data methodology deficiency identified, traffic has been growthed using TEMPRO from the survey year (stated as 2016) to a base year of 2020 and future base years of 2025 and 2030.

Clarification from the applicant is required as to the base year of 2016 given that the Fort Acres Farm application utilised data from 2015 and 2017, however it is assumed that 2016 has been chosen to extrapolate between the two dates.

Assessment Years/Scenarios

The following assessment scenarios have been derived:

- 2016 Observed

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- 2020 Base
- 2020 Base + Development
- 2025 Future Base
- 2025 Future Base + Development
- 2030 Future Base
- 2030 Future Base + Development

The scenarios derived above are considered to be appropriate, however a concern exists in regard to methodology in that the scenarios are based upon the “worst-case” one unit scheme of wholly B2 use.

Whilst this is considered to be appropriate in-principle there is a discrepancy between what is determined as the “worst-case” scenario given that the highway operational assessment is based upon a wholly B2 use yet the parking provision is based upon a wholly B8 scenario.

Whilst not directly affected with the operational assessment, good practice should dictate that the defined “worst case” scenario should be consistent throughout the assessment and this should be reflected within the future work to be submitted.

It should be noted that whilst the modelling outputs have been reviewed on face value, the future TA addendum to be provided should be supported by design drawings marked up illustrating the relevant dimensions utilised for the models for review.

Primary Site Access

The primary site access has been modelled only for the “with development” scenarios which is appropriate and has been modelled using PICADY (**P**riority **I**ntersection **C**apacity **A**nd **D**elay).

Based upon the information presented within the TA in regard to traffic flows and trip assignment and trip rates the results demonstrate the following:

The primary site access in isolation assessment demonstrates that the junction is predicted to operate well within theoretical capacity limits with a maximum Ratio of Flow to Capacity (RFC) of 0.34 with an associated maximum queue length (MaxQ) of 0.5 passenger car units (pcus) occurring on the site access arm of the junction during the 2030 base + development scenario during the PM peak hour.

Primary Site Access with Secondary Access

With both primary and secondary accesses in operation the primary site access would be predicted to operate well within theoretical capacity limits with an RFC of 0.14 with

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an associated MaxQ of 0.4pcus occurring on the Harts Farm Way (westbound) arm of the junction during the 2030 base + development scenario during the AM peak hour.

Secondary Site Access with Primary Site Access

With both primary and secondary accesses in operation the secondary site access would be predicted to operate well within theoretical capacity limits with an RFC of 0.38 with an associated MaxQ of 0.6pcus occurring on the site access arm of the junction during the 2030 base + development scenario during the PM peak hour.

A27/Harts Farm Way Teardrop Roundabout

The Teardrop roundabout is partially signalled and has been operationally assessed using LinSig (**L**incolnshire **S**ignals).

The modelling results would predict only a minor impact upon the operation of the junction.

LinSig modelling predicts the ratio of demand to capacity for each phase of traffic passing through the junction. This is considered as the Degree of Saturation (DoS) with a value of 90% indicating an arm is operating at its practical capacity.

Practical Reserve Capacity (PRC) is calculated from the above DoS and is a measurement of what level of additional traffic can pass through the junction as a whole.

The Mean Maximum Queue (MMQ) provides an estimation of how the overall junction performance may impact adjacent junctions on the network.

The results of the operational modelling demonstrate that during the 2030 Future + Base scenario the junction would experience a DoS of 92.4% occurring on the A27 Link Road arm (ahead) during the AM peak hour with a PRC of -2.7%.

This is compared to the 2016 observed flows illustrating a DoS of 72.3% and a PRC of 16.1% and the 2020 base scenario of 77.1% and a PRC of 10.8% when associated with similar junction phases.

The 2030 base + development scenario compared to the 2030 base only scenario demonstrates a negative PRC which would indicate that the junction begins to operating over capacity as a whole during the AM peak hour.

Given the links contained on the junction for the strategic network, Highway England will need to assess this modelling once a TA addendum with updated information comes forward.

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Rusty Cutter Roundabout

The Rusty Cutter Roundabout is also partially signal controlled and has been operationally assessed using LinSig.

Again, the modelling results would predict only a minor impact upon the operation of the junction.

The results of the operational modelling demonstrate that during the 2030 Future + Base scenario the junction would experience a DoS of 91.0% occurring on the A3 southbound off-slip road entry lanes) during the AM peak hour with a PRC of -1.1%.

This is compared to the 2016 observed flows illustrating a DoS of 75.8% and a PRC of 17.8% and the 2020 base scenario of 81.0% and a PRC of 11.0% when associated with similar junction phases.

The 2030 base + development scenario compared to the 2030 base only scenario demonstrates a negative PRC which would indicate that the junction begins to operating over capacity as a whole during the AM peak hour.

Given the links contained on the junction for the strategic network, Highway England will need to assess this modelling once a TA addendum with updated information comes forward.

Summary

Given the comments provided, whilst there continues to be no in-principle broad objections to a scheme of this nature coming forward at this site in highways terms there have been a number of concerns raised in regard to both the assessment and aspects of the assessment methodology to date.

A number of items have been highlighted as requiring further assessment, redefined assessment, and sensitivity testing.

With that in mind the Highway Authority raises a standing objection to the proposal pending submission of the further highlighted information for review.

Yours sincerely,

Alistair McMurray

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