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<i>Date</i>	2 nd September 2020	<i>Email</i>	Chris.hirst@hants.gov.uk

For the attention of Ms L Wells

Dear Madam

Outline planning application with all matters reserved except access for the development of up to 120 dwellings and associated improved site access, landscaping, footpaths, SuDS and other associated works on land to the west of Hulbert Road, Havant.

Thank you for consultation on the above planning application which seeks outline planning permission for the development of 120 dwellings to the west of Hulbert Road.

The Highway Authority has previously held pre-application talks with the applicant to discuss the transport implications of the proposed development. The applicant has submitted a Transport Assessment (TA) following these discussions, although it is noted that the majority of comments raised at pre-app have not been addressed. Our comments on the application as it stands to date are set out below.

Existing Conditions

The proposed development is located to the west of Hulbert Road between the Purbrook Way/Hulbert Road roundabout to the south and the Dunsbury roundabout to the north. Hulbert Road is subject to a 40mph speed limit with no existing pedestrian provision.

Hulbert Road is lined by woodland to the east and west and does not benefit from any street lighting. Any status of this woodland or ownership is unknown and should be clarified in order to understand the limits of the offsite improvements that can be achieved.

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

Site Accessibility

To understand the accessibility of the proposed development to sustainable modes of transport, the National Travel Survey (NTS) has been referenced. The NTS identifies that pedestrians are willing to make journeys on foot up to 3.2km away. Similarly, the survey states that the maximum distance people are willing to cycle is 8km.

The Highway Authority does not agree with these assumptions and instead acknowledges the findings within the CIHT's 'Providing for Journeys on Foot' document which identifies that the preferred maximum walking distance is considered to be 2km, whilst the maximum cycling distance is 5km. The NTS data acknowledges that the proportion of journeys above these distances by these modes is significantly less than those within these distances. Therefore, the view remains that sustainability assessments should be based on the CIHT data. These parameters have not been replaced within the NTS document.

Walking and Cycling Access

Hulbert Road does not currently benefit from any footway provision. The existing footway provision terminates to the north of the Purbrook Way/Hulbert Road roundabout which features controlled crossings on the multiple arms and circulatory.

Table 3.3 identifies local facilities in the area and the approximate distance from the site to reach them. Taking 2km as the preferred maximum walking distance, it is noted that locations such as Crookhorn College (2.1km) and Bedhampton Rail Station (2.3km) sit outside of this distance and are therefore unlikely to be accessed by foot.

Similarly to pedestrian infrastructure, Hulbert Road does not benefit from any off-road cycle provision. Shared use facilities are provided along Purbrook Way to the south west of the site, which also forms part of the National Cycle Network, and around the Purbrook Way/Hulbert Road roundabout.

To the north, off-road shared use facilities will be constructed by Portsmouth City Council from the Dunsbury Roundabout through the Dunsbury business park to Woolston Road.

Through pre-app discussions, the Highway Authority identified the requirement to provide pedestrian/cycle connectivity to the south to connect into the existing provision at the Purbrook Way/Hulbert Road roundabout. This is a necessity given the lack of existing provision along Hulbert Road to connect the development into nearby facilities. The proposals at pre-app detailed a 3m wide shared use path from the southern boundary of the site down to the existing provision; however, this has been reduced to a 2m wide footway in drawing number A096474-SK02 with no justification. The applicant should provide justification why the link has been reduced from what was previously shown and how safe cycle access to the development can be achieved to the

south in accordance with the advice received at pre-app. It is noted that LTN 1/20 has been released since the pre-app advice was provided. The design hierarchy should be considered by the applicant when determining appropriate cycle access provision to the south.

The application also proposes a footway link to the north to connect into the Dunsbury roundabout, should a link be provided into Dunsbury Park from the roundabout. Portsmouth City Council are currently undertaking design work to provide a shared use path from the business park down to the Dunsbury roundabout. It should therefore be investigated whether the northern link can be provided as a shared use footway/cycleway to provide a continuous route between Dunsbury Park (in conjunction with Portsmouth City Council's works at this location) down to the Purbrook Way/Hulbert Road roundabout. This matter should be discussed further with the Local Highway Authority and Portsmouth City Council to ensure required improvements are cohesive with the PCC design.

Bus

The nearest bus stops to the proposed site are located circa 700m away on Purbrook Way, to the south of B&Q. The stops on both sides of the road consist of a shelter and timetable, providing services to Havant and Portsmouth every 30 minutes and wider destinations such as Petersfield every hour.

Rail

As noted above, the nearest rail station to the site is located within Bedhampton which is 2.6km away and is considered more conducive for cycle trips rather than walking trips. The station provides trains every 20 minutes into Havant and every hour to wider destinations such as Portsmouth and London Waterloo.

Personal Injury Accident Data

Personal Injury Accident (PIA) data has been gathered for the local highway network between 2014 and 2019 from Crashmap.

The Highway Authority does not accept the use of Crashmap accident data and instead requires the most recent accident data to be gathered from Hampshire Constabulary, along with an update to the supporting analysis of the recorded accidents which also comments on the location of each accident.

Development Proposals

Outline permission is sought for the provision of 120 dwellings with access taken from Hulbert Road. The applicant has not specified what the mix of private and affordable dwellings is likely to be, nor have they detailed what the parking strategy for the site will be.

A proposed site layout has been provided in Appendix C, but it is noted that the plan is currently vague and does not provide any details for the Highway Authority to comment on. Should outline planning permission be granted for

the site, the applicant will be required to produce a detailed masterplan with confirmation on the mix of dwellings, parking & refuse servicing provision and proposed internal layout for consideration at reserved matters.

At present, it is unclear whether the internal layout will be offered for adoption by the developer. To facilitate road adoption, the Section 38 process will need to be undertaken in addition to any planning approval that may be granted by the Local Planning Authority, the details of which can be found via the following link -

<https://www.hants.gov.uk/transport/developers/constructionstandards>.

It is recommended that the developer engage with the S38 team at their earliest convenience. Developers should also be made aware of the Advanced Payment Code (APC) that will be required by the Highway Authority. Details of this can be found via the following link -

<http://documents.hants.gov.uk/transport/APCProcessGuidancedocumentforwebsitev22018-04-02.pdf>.

Vehicle and Cycle Parking Provision

As mentioned above, it is not currently possible to comment on the layout of the proposed vehicle and cycle provision until the site proposals have been developed further at reserved matters.

It should be noted that the quantum of vehicle parking will be for Havant Borough Council to address in their capacity as the local parking authority. It is noted within the submission that parking will meet the required parking standards and therefore subject to an agreeable layout at reserved matters stage the highway authority have no further comment at present.

Trip Generation

To understand the vehicular trip generation from the site, the TRICS database has been utilised. The 'mixed private/affordable' category has been selected as a 'worst case scenario' for trip generation which notes that two way trip rates would be 0.495 in the AM and 0.446 in the PM, resulting in vehicular trips of 59 in the AM and 58 in the PM.

The Highway Authority disagrees that this would be a worst-case assumption for the site as this would assess sites under the 'houses privately owned' category only. The trip rates should be revisited to ensure that a robust assessment has been carried out given that the current split of private/affordable dwellings is unknown.

Trip Distribution

The applicant has distributed vehicular trips from the site based on the existing traffic flows recorded along Hulbert Road in February 2019. These traffic surveys indicate that existing flows along Hulbert Road are 58% northbound and 42% southbound in the AM and 48% northbound and 52% southbound in the PM.

The Highway Authority does not agree that this assessment is representative of the expected distribution from the proposed residential development. The trip assignment is likely to differ from the site given that there are currently no existing residential developments on Hulbert Road and the route is a direct route to access the A3(M) at junction 3 for a large residential area. Trips from the site are likely to be guided by the location of work-based destinations. Census data for the relevant MSOA should therefore be analysed and trips from the site assigned to the local highway network on this basis.

Baseline Traffic Data

To understand the existing speeds and flows along Hulbert Road, the applicant undertook an ATC survey during February 2019. The results on the speed survey indicated that the 85th percentile speeds were 49.2mph both northbound and southbound, nearly 10mph greater than the signed speed limit on Hulbert Road.

The applicant has not presented any measures to reduce speeds along Hulbert Road. The introduction of a new access on Hulbert Road could introduce a new safety concern on the Highway without suitable mitigation. The applicant should therefore consider forms of mitigation in conjuncture with the site access proposals.

Vehicular Access

Vehicular access into the site is proposed via a new ghost island right turn lane from Hulbert Road which is shown in Drawing number A096474-SK01.

Junction modelling has been undertaken for the new right turn lane arrangement into the development. The access has been modelled to a 5-year future scenario which shows the highest Ratio of Flow to Capacity (RFC) of 0.15 on the site access arm of the junction in the AM and a maximum queue of 0.2 PCUs. While the modelling work may need to be revisited once the trip rates have been agreed for the site, the access is still considered likely to be working within operational capacity.

As part of pre-app discussions on this site, the Highway Authority have previously provided comments on the proposed access arrangement which have not been addressed in the TA. It is unclear why a right turn lane into the site is required as there is no existing safety issue in this area, nor is there is a need in capacity terms, which is corroborated by the junction capacity analysis above. It is noted that the carriageway will need to be widened on the eastern side of Hulbert Road to provide the right turn lane, impacting on the existing ditch and tree belt which has not been noted by the applicant. The status of this tree belt has not been explored and we believe the wooded area on the eastern side of Hulbert Road does have protected status. This should be investigated further by the applicant.

The speed surveys undertaken on Hulbert Road also confirm that the 85th percentile speeds are greater than the signed 40mph speed limit, but no comment has been made with regards to the impact of the right turn lane on

these speeds. This matter should be investigated further through a Road Safety Audit.

To fully assess the proposed access arrangement and requirement for a right turn lane, the applicant is required to provide the following information:

- The radii and dimensions included on the access drawing.
- Tracking drawings for a family car, refuse vehicle and pantechnicon are required for the new access. Tracking for the refuse vehicle should be shown while a car waits at the stop line of the access.
- The Highway boundary should be shown to demonstrate the visibility splays can be achieved within the extent of the highway. Given the level of vegetation in the area, a topographical survey should be provided to confirm the level of tree removal required to achieve the vis splays.
- An arboriculture report which addresses the impact of the tree loss to accommodate the right turn lane.
- A Stage 1 Road Safety Audit.

The Highway Authority would welcome further discussions regarding the vehicular site access arrangement.

Traffic Impact Assessment

Junction modelling has been carried out for the site access only. It is considered the junction modelling at this stage should be extended to cover the Purbrook Way/Hulbert Road and Dunsbury roundabouts to understand the development's impact at this location. However, on agreement of the distribution, the requirement to consider other junctions may become apparent. It should be noted that Hampshire County Council already hold Linsig models for the Purbrook Way/Hulbert Road roundabout which can be utilised at a cost should this be required. The Highway Authority would welcome further discussions with the applicant should they wish to acquire these model files.

Framework Travel Plan

The current framework travel plan is considered inadequate. The following changes should be made:

- A 5% reduction in SOV use is not considered SMART (Specific, Measurable, Achievable, Realistic, Timely). For a site of this description we would expect a minimum target of 10% reduction in SOV use over the five years monitoring period.
- The existing action plan should include all measures listed in the measures section, below is a suggested layout. Please note that estimated costs **must** be included.

Objective	Measure	Start Date	Due Date	Responsibility	Mode affected	Cost Estimate	How to measure success

Table 4 - Example Action Plan

- The existing measures section is not considered adequate. A non-exhaustive list of measures we would expect in a site of this description can be found below:
 - Promotion of safe local walking routes, including:
 - The provision of route maps
 - Improvements to (and maintenance of) the walking network and signage
 - Promotion of free health apps
 - Coordinate with schools to organise walking to school events
 - Sustainable travel voucher
 - Improvements to (and maintenance of) the cycle network
 - Provision of cycle route maps and improvements to signage
 - Secure, well lit, covered cycle storage with pumps
 - Formation of a Bicycle Users Group (BUG)
 - Provision of clear public transport information (available direct from the local operator)
 - Collaboration with local public transport providers to improve services, negotiate discounts and trial initiatives
 - Review of car parking policy and introduce a management strategy
 - Provision of information to all occupants, residents, visitors and staff on how to access the site by means other than the car through a variety of methods, including:
 - Personal travel planning
 - Notice boards / team meeting agenda
 - News letters
 - Hold events
 - Focus groups
 - Introduction of a personalised journey planning scheme
 - Promote home delivery services
 - Provide good quality broadband services
 - Promote home working, where possible
- The existing monitoring strategy is unclear. We would expect, as a minimum, a monitoring strategy similar to below:

	Baseline (Year 1)	Year 2	Year 3	Year 4	Year 5
Level of report	To be submitted one year after occupation. This will include the baseline survey results found in the updated Full Travel Plan and a monitoring report.	Monitoring Report	Full Surveys - Monitoring Report	Monitoring Report	Full Surveys - Monitoring Report

- Please note that surveys require a minimum response rate of 35% to be considered statistically significant. This should be noted within the travel plan. Measures should be in place to ensure this response rate is met i.e. vouchers.
- An example survey must be included within the travel plan.
- There should be a paragraph explaining the role of the Section 106 agreement including the value of the Travel Plan Cash Deposit (where applicable)
- Commitment to pay HCC's monitoring and approval fees
- Commitment to provide a Travel Plan Cash Deposit of equal value to travel plan measures

Recommendation

The Highway Authority requires additional information to address a number of concerns held with the current development proposals, this relates to the following:

- Updated PIA Data from Hampshire Constabulary;
- Site access;
- Investigation into speed reduction measures on Hulbert Road;
- Further investigation into the northern and southern pedestrian/cycle connections;
- Updated TRICS assessment;
- Updated trip distribution assessment;
- Junction modelling for the Purbrook Way/Hulbert Road and Dunsbury roundabouts; and
- Updated Framework Travel Plan.

I trust the above is clear. Should you require further clarification, please feel free to contact Chris Hirst on the number noted above.

Yours Sincerely,

Gemma McCart – Transport Team Leader