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Date	11 th December 2018	Email	holly.drury@hants.gov.uk

For the attention of Lewis Oliver

Dear Sir

**Former BAE Systems, Waterloo Park, Elettra Avenue, Waterlooville:
Outline planning application with all matters apart from access reserved
for subsequent approval for the erection of Class B1(c)/ B2/ B8/
development and Class B8 Trade Counter use, Class A1 Retail, Class C1
Hotel, Class D2 Leisure and Classes A3 and A5 Drink/Food
Establishments.**

Thank you for the opportunity to comment on the above application.

Proposed Development

The site is for development of mixed use across two parcels within the site. It is understood from the Transport Assessment that these are as follows:

- Parcel 1: B1c/B2/B8/B8 Trade Counter across a total of 29,820sqm
- Parcel 2: A1 Retail and A3/A5 use/D2 Leisure and A3/A5 use / A4 Public House and C1 Hotel across a total area of 10,288sqm.

Clarity is sought from the applicant on whether these floor space areas are net or gross.

Existing Conditions

The proposed site is currently vacant within the Brambles Business Park. Permitted development within the wider development plot having been constructed and operational in the form of a McDonalds restaurant and Lidl store. The proposed development would occupy the remainder of the site.

Pre-Application Advice

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

Pre-application discussions were held with the Highway Authority in December 2017. This advice has been appended to the TA in appendix B. It is noted within this advice that a number of elements have not been addressed within the TA. These relate to the following:

- Insufficient assessment has been provided relating to the identification of the peak hour assessment needs.
- Funding towards a crossing on Hambledon Road has not been acknowledged within the TA although this was set out within our pre-application response.
- No evidence has been provided on discussions with the bus companies regarding rerouting services to Elettra Way to serve the development more directly. There is also no narrative relating to the commerciality of the route and whether subsidisation is required.
- Engineering details of the service access arrangements have not been provided.
- Previous comments relating to the proposed improvements to the Elettra Avenue approach to the Milton Road roundabout have not been addressed within the TA.

Personal Injury Accident Data

Personal injury accident data has been provided for a suitable area around the site. This data has been assessed within the TA and notes that there are no safety issues apparent as a result of personal injury accidents to be aware of within the study area. The junction has previously triggered review by our Safety Engineering Team. However, at present there are no remedial measures proposed to address the current accidents at the junction.

Sustainable Transport Accessibility

Bus & rail travel

The site is not directly served by a railway station and therefore no assessment of this has been undertaken within the TA.

With regards bus travel, the site is served by a frequent service number 39 and 7. Route 39's nearest bus stop is located on Milton Road and is approximately a 5 minute walk via the existing crossings on the northern Hambledon Road arm of the roundabout and then crossing uncontrolled on Elettra Avenue. Alternatively, it is estimated to be a shorter distance via the new McDonalds link and crossing of Hambledon Road and therefore it is considered that this would be a stronger desire line. This will therefore need to be considered within the walking and cycling assessment to the site.

The Star 7 route also serves the site from the crossing on the southern arm of Hambledon Road. Again, this requires crossing the dual carriageway to enter the site and this matter should be fully considered within the TA.

Walking and Cycling Accessibility

A high-level walking and cycling assessment have been undertaken which is insufficient to support an application of this size. The assessment has failed to identify a number of missing links in the area to the development site. The nature of the proposed development will encourage a significant amount of additional walking and cycling trips which have not been considered within this review.

The main site access is proposed to remain from the Elettra Avenue roundabout. Whilst it is noted that a recent footway has been installed, this does not provide suitable cycle access to a site which will generate significantly more demand.

With no proposed internal layout, there are no suggestions to date of additional pedestrian and cycle access points to the site. These should be considered and locations for these identified and secured through any outline planning consent.

There is also evidence on site, and through our pre-app response, of an un-catered desire line specifically to the development. This connects from Milton Road to the recently implemented pedestrian link to the McDonalds area of this site. Any further development of a retail/employment type will further increase demand on this desire line. There is currently no safe crossing point on Hambledon Road in the vicinity of the new desire line. The existing uncontrolled crossing has been reviewed as a concern site by the Casualty Reduction Partnership after a number of complaints. This has concluded that there is a need to provide controlled crossing facilities to cater for this movement across the dual carriageway in light of the current use and forecast additional demand as a result of further development. The scheme is currently in the design stages and is proposed to be forward funded by HCC and HBC ahead of further development of BAE. This development is therefore expected to offer a contribution towards this infrastructure which is necessary to support sustainable access to the site.

Access to the site from further north on Hambledon Road is also convoluted with no direct footway/cycle path to the site. This matter should also be reviewed further.

Generally, a more detailed assessment is required, reviewing desire lines to the site and establishing supporting infrastructure. Currently the highway authority is not satisfied that sufficient pedestrian and cycle infrastructure is in place to provide the level of walking and cycling access required to a development of this scale.

Car Parking

Details of car parking requirements will be responded to by our Agent at Havant Borough Council. However, to ensure that suitable provision is made and in order for us to assess the impact of any parking some commitments are required at this outline stage regarding the level of parking to be provided for each proposed use.

Site Access

Site access is proposed via the existing 4 arm roundabout on Elettra Avenue with no changes proposed to the roundabout to accommodate the site. Modelling has been provided and this shall be reviewed further within this response.

Additional accesses are also proposed indicatively within the application on the western boundary of the site, with these being a secondary access or servicing access points. Details of these must be provided at this outline stage if they are considered necessary in order to support the development. Reference is also made within the TA regarding access for servicing and staff parking via Silverthorne Way. Again, if additional accesses are proposed details of these should be provided. Tracking of the existing access points and details on servicing access are required at this outline stage in order to ensure appropriate measures are put in place within any outline consent to provide safe and efficient access to the site.

Vehicular Trip Generation

A number of options have been considered within the TA relating to the proposed development mix. Section 6 of the TA sets out further floor space allocation within the site. The total suggested floor spaces do not accord with the proposed scale of development set out within the application. Clarity is therefore sought on the exact gross floor space being applied for.

Section 6 of the TA assumes the following:

Parcel 1 – Employment floor space comprising a maximum of 14,771sqm of b1(c)/B2/B8/B8 trade counter use (of which no more than 2,787 sqm would be B8 trade counter)

Parcel 2 – Leisure/retail type uses comprising the following options:

- A maximum of 4000 sqm of A1 Retail (non-food) plus A3/A5 use (a maximum of 334sqm); or
- A maximum of 4000 sqm of leisure plus A3/A5 use (a maximum of 334 sqm); or
- A maximum of 640 sqm A4 public house and 100 bed C1 Hotel.

Confirmation is required that restrictions within the planning consent will be applied to limit the development as set out above.

It is noted that all trip rates have now been provided consistently for the gross floor area. Trip rates have been derived using TRICs data for the various floor space uses. The worst-case scenario for trip generation is provided within the TA. However, this cannot be agreed until confirmation regarding restrictions on use within any planning approval have been confirmed.

The number of trips generated by similar floor space usage has been assessed within transport assessments submitted for previous applications

(APP/13/00893 and APP/15/00770) at the former BAE site. These assessments also derive trips based on gross floor area and are therefore directly comparable to the assessments undertaken for this application. Given that these trips have previously been accepted, they should be adopted and considered by this application to provide a robust and comparable assessment of what has previously been approved.

The highway authority therefore require that the aforementioned planning references are investigated to ascertain the trip rates that have previously been agreed. These rates should then be applied to this application to maintain a consistent approach to calculating trip rates for this site.

Trip Distribution

Vehicular trips have been distributed on the network for employment uses utilising census data for the middle super output area, Havant 003. The census data assesses the likely destination of work-based trips from the relevant output area. Havant 003 output area covers the BAE site and therefore provides a robust assumption for employment generated trips. A breakdown of this assignment is provided in Table 10 which reflects the output data provided in Appendix H.

The retail and food uses have been distributed utilising the methodology agreed for the Block E, discount food store and drive through restaurant applications. This is based on ward level census data and the catchment area for the development remains unchanged within the retail assessment making this methodology still appropriate.

Committed Development

It was agreed at the time of the pre-application discussions that there were no other significant developments other than the Waterloooville MDA which needed to be considered to support any application. Post this meeting in 2018 an application has been made for 264 flats within Waterloooville town centre. This development site needs to be considered as committed development and the impact of any additional traffic generated accounted for within the technical assessment.

Base Traffic Conditions

Traffic surveys were undertaken in June 2017 and November 2017. These surveys are dated given the level of development growth in the area as a result of Waterloooville MDA. The TA sets out that the difference in occupied development has been taken into consideration however it does not clarify at what point in time this assessment was undertaken. Appendix K refers to 394 occupations on the northern site and 319 on the southern site. However I believe the site is currently in excess of this. Distribution diagrams have been provided demonstrating the flow from the MDA within appendix J are illegible and therefore this could not be reviewed. The relevant information should be sent through in a legible manner so a full assessment can be undertaken regarding the establishment of a suitable base scenario.

The TA acknowledges that in June 2017, when the turning count was undertaken at the Hambledon Road/Elettra Avenue roundabout, Lidl was not operational. No approved distribution diagrams have been provided and these should be included within the TA to the Highway Authority can be satisfied that these have been applied as agreed within the permission.

Peak Hours

It is acknowledged that the development peak may differ from the traditional morning and evening peak hours depending on the make-up of the development. It was therefore requested within our pre-application discussions that an assessment was undertaken. Further ATC data has been provided from Elettra Avenue and Hambledon Road.

The traffic count data has been provided along with junction flow diagrams within appendix L. The diagrams have not been labelled however in a manner which allows the highway authority to interpret the numbers. The diagrams should be clearly identified for the time period they cover and a key should be provided for the diagrams relating to the 2 columns of numbers. Once this clarity is provided a view can be made on the most appropriate assessment periods. This should be based on the time in which the combination of existing traffic and development related flows are at their highest.

Background Traffic Growth

No details have been provided on how wider background traffic growth has been applied. TEMPRO should be reviewed to ensure against the assumed committed development to determine whether additional growth to 2023 is required.

Traffic Impact

Assessments have been undertaken at a number of nearby junctions including:

- Site Access
- B2150 Hambledon Road/Milton Road Roundabout

No detailed comments can be provided relating to the modelling results until details relating to the forecast demand and background growth have been concluded. It is noted that an improvement has been proposed for the Elettra Avenue arm of the roundabout. It is considered that this scheme would not result in any significant changes to the capacity of the junction on the ground. The approach from Elettra Avenue is already 2 lanes and the extra width does not provide any additional vehicle capacity on the approach to the roundabout.

Consideration was also requested within the pre-application comments regarding the potential need to improve crossing facilities on this arm to aid with access to the McDonalds pedestrian link to the development site. This should be viewed holistically when reviewing suitable mitigation measure to accommodate traffic from the proposed site.

Travel Plan

The Framework Travel Plan (FTP) has been assessed using Hampshire County Council's (HCC's) evaluation criteria for the assessment of travel plans – "A guide to development related travel plans". This FTP was formulated by David Tucker Associates and encompasses the development of Parcel 1 (29,820sqm of Trade Counter B1c/B2/B8) and Parcel 2 (10,288sqm of A1/A3/A5/D2/A4/C1), on behalf of Hargreaves Properties Limited. The FTP currently does not meet the minimum standards found within HCC's guidance. These areas will need to be addressed before it is accepted as part of the proposed development.

Background

It is noted that the DETR's 1998 'A New Deal for Transport: Better for Everyone' and DfT's 2009 'Good Practice Guidelines: Delivering Travel Plans through the Planning Process' are included as policy context. We would expect current planning guidance to be used as a basis for travel plan policy context. The following policies are a non-exhaustive list which you may wish to include within the travel plan:

- National Planning Policy Framework (NPPF) 2018 – <https://www.gov.uk/government/collections/revised-national-planning-policy-framework>
- Planning Practice Guidance 'Travel Plans, Transport Assessments and Statements 2014 – <https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements#travel-plans>
- Hampshire County Council's 'A Guide to Development Related Travel Plans' 2009 – <https://www3.hants.gov.uk/guide-to-travel-plans-january-2010.doc>
- Havant's Parking Policies and Procedures – <https://www.havant.gov.uk/parking-policies>

As part of the background, it is expected that a comment from the developer outlining their own policies on travel plans and sustainable travel is included. This may be in the form of:

- A statement from the developer
- A quote from the developer's website

Consultation and partnerships

As part of the framework, we would expect the following commitments to be made:

- To consult site users
- To liaise with local public transport operators before occupation
- To liaise with local cycle shops before occupation
- The site's TPCs to work with other local businesses and their TPCs

Site Audit

The site plan (Figure 1) will require work before it is considered acceptable. The following is a list of recommended improvements to be made:

- Use an updated map of the area
- Include a copy of the figure within the text
- Highlight the areas of Parcel 1 and Parcel 2. A large star is not an adequate descriptor of the site's extent, especially when there are other employers within the site boundary. For example; there is mention of a McDonalds site within the Public Transport section, where is this on the map?
- Update the key. For example, there is no description of what the shaded areas on the map denote
- Inclusion of the key trip attractors in the area which are within walking distance of the site that staff may use. For example:
 - Shops
 - Leisure
 - Public transport

We would expect these attractors to be labelled on a map with walking isochrones. It is advised that these isochrones use CIHT's expected walking distances;

	Local Centre (m)	Commuting/School/Sight-seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1000	800
Preferred Maximum	800	2000	1200

Table 3: CIHT Guidance for Providing for Journeys on Foot

- It would be useful to number each bus stop. This will help to explain which services run at which bus stop within section 3.3. If the same service stops at all bus stops in the immediate area, this should be mentioned.
- As well as a local map of the vicinity, include a high-level map of the area. This helps when referencing, for example Denmead (3.2.6).

It is noted that walking and cycling provisions for the site are included. It would be useful to include a brief description of the footways and cycle paths, for example widths and surface type. In the past, photos have been used to good effect.

In addition, cycling routes beyond the vicinity of the site which may be used for staff to commute to and from the site should be highlighted. In the past, travel plans with similar specifications have included Sustrans' National Cycle Network – <https://www.sustrans.org.uk/ncn/map/route/route-2> and other such resources. For example, National Route 222 runs through Waterlooville at a close proximity to the proposed site.

It is recommended to include a description of the walk to the most relevant bus stops. This should include whether the way is street lit as well as a description of what is found at the bus stop (cover, live updates, seating etc.).

It is understood that the site is not located 'close' to a train station. However, there is no reason to not include the closest station within the travel plan. Multi-modal trips should be actively promoted. For example, walking to a bus stop – getting the bus to Cosham Station – getting the train to a final location. For this reason, destinations to / from the station should be included.

As part of the site assessment the following should also be included to meet Hampshire's guidance:

- Proposed site infrastructure
- Current site infrastructure
- Operational hours (where applicable)
- Visitor / Delivery movements (where applicable)
- Appropriate travel data to inform the travel plan

Targets

"As this is a new development and no current travel patterns exist, specific targets for modal shift cannot be set". At the framework stage, we would expect measurable targets. Background modal data can be sourced through either the latest travel to work data (census 2011 – <https://www.nomisweb.co.uk/census/2011/qs701ew#>) or through TRICS, which would usually be found within the Transport Assessment. In addition, a specific target breakdown for all modes should be listed as well as an explanation as to why they have been chosen. A general aim for SOV reduction over a 5-year period is 5%. This will allow for a Specific, Measurable, Achievable, Realistic and Timebound target to be set.

Should the baseline surveys contradict the expected figures, then the target may be adjusted through discussions with Hampshire County Council.

Measures

The measures currently outlined in the action plan are not considered adequate. At the framework stage we would expect the travel plan to include all relevant measures within its action plan, regardless of whether the responsibility will at some point fall to the occupier. Should you require guidance on the types of measures to include, Appendix E in 'A guide to Development Related Travel Plans' <https://www3.hants.gov.uk/guide-to-travel-plans-january-2010.doc> contains a non-exhaustive list.

In addition, all measures included within the action plan will require an associated cost. At the framework stage these will be estimates, to be built upon within the relevant full travel plans. A timeframe for each measure should also be included; with a start, duration and end date where applicable.

Roles and responsibilities

The current role of the site wide TPC is unclear. Will this position be in place after the individual occupiers have appointed their own TPC? Will the site wide TPC act as the bridge between the entire site and HCC? This should be elaborated upon.

In addition, there should be a breakdown of the amount of time each TPC will spend working on the TP per week and in turn their overall cost. It is insufficient to not provide a budget for these roles at this time.

It is noted that a TPC will be implemented for each of the uses for a minimum of 3 years. This is insufficient. The TPC should be in place for the length of each travel plan, 5 years. Toward the end of the TPC's posting, the role should be handed to relevant stakeholders – for example an employee travel group.

There should be commitment for the TPC details to be provided to HCC upon appointment.

Monitoring

It is mentioned that both a staff and visitor survey will be used. Only the staff survey is provided in the appendices. This is of good quality. However, we require an example of the visitor survey too.

There should be a measure in place to ensure that there is a 35% response rate to surveys. Examples of previous initiatives have included entering respondents into a prize draw for an online retail voucher (it should be noted that the voucher should not be related to sustainable travel).

For a site of similar specification, we would expect the monitoring to follow a timeline similar to:

	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

It would also be useful to conduct snapshot surveys during years where full surveys are not expected.

Whilst we aim to respond to all monitoring reports within one month, this is not always feasible. For this reason, section 6.2.2 will need to be removed.

Delivery and enforcement

As part of the travel plan, the means for enforcing the travel plan should be included. This may be a simple line outlining the role of the S106 and the travel plan bond. In addition, there should be commitment to pay Hampshire's travel plan fees, as outlined on Hampshire County Council's website - <https://www.hants.gov.uk/transport/developers/travelplans/assessment>.

It is welcomed that discussions will be held should targets not be met.

Travel Plan Summary

The TP will require further work, as set out above, as it does not meet the minimum standards set out in HCC's "A guide to development related travel plans". The issues raised should be addressed in a new revision of the TP before it can be considered acceptable for submission in conjunction with the proposed residential site.

A cover sheet identifying where changes have been made must be provided.

Recommendation

As set out above, there are a number of matters that require additional information to demonstrate that the site would not result in a severe impact on the local highway. Additional information is sought from the applicant relating to the following:

- Consideration of matters raised within the highway authority's pre-application response;
- Funding towards the controlled crossing on Hambledon Road;
- Detailed walking and cycling assessment of the anticipated desire lines from the site;
- Further information regarding the proposed additional accesses to the site;
- Updated trip rates taking account of the assessments previously undertaken and approved for this site;
- Updated committed development assessment;
- Provision of the approved Lidl distribution diagrams;
- Legible copies of the Waterlooville MDA flows in Appendix J;
- Further details regarding Appendix L;
- Review of TEMPRO to understand the levels of background growth to be considered;
- Consideration towards an updated improvement scheme at the Elettra Avenue/Hambledon Road roundabout; and
- Updated Travel Plan.

If you are minded to determine the application before this additional information is submitted, I would request that you contact me for reasons for refusal.

I trust that the above is clear but I would ask you not to hesitate to contact Holly Drury should you wish to discuss anything further.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Ben Clifton', with a stylized, flowing script.

Ben Clifton
Team Leader

CC Peter Marshall, Development Engineer, Havant Borough Council