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<i>Date</i>	10 th May 2018	<i>Email</i>	Holly.drury@hants.gov.uk

For the attention of David Eaves

Dear Sir

Wellington Way and, 95-101A London Road, Waterlooville – Demolition of existing shopping parade and redevelopment of the site to provide a nine storey building consisting of 264No. 1 bed/studio build to rent apartments and associated amenity facilities, a D2 gym and A3 café, together with associated parking and landscaping.

Thank you for the opportunity to comment on the above application. The development proposes the redevelopment of 1530sqm of retail space to provide 264 residential studio units set over 9 floors, with some ground floor space provided for D2 gym (100sqm) and A3 café (62sqm) use. Associated car and cycle parking has been proposed alongside the development.

Policy Background

The policies noted and addressed are considered acceptable. However, no mention has been made to the Draft Havant Borough Council Local Plan to 2036 which references all allocated sites for residential and employment development.

The site itself is not allocated within the plan, but is referenced under 'KS2 Waterlooville Town Centre' which mentions the potential for 'high density residential development including more innovative housing product' in this area. This should be referenced in the transport assessment.

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

Existing Conditions

Currently, the site comprises a 2 storey shopping centre within Waterlooville town centre.

As a result of the site's central location, public transport infrastructure links are in close proximity to the development with the nearest bus stop to the site an approximate 70m walk on Hambledon Road.

Both the Wellington Way and Rockville Drive car park lie in close proximity to the site and provide the option for residents to park (assessment of which is provided in the parking review).

Personal Injury Accident Data

A summary of PIA data has been carried out for the most recent 5 year period spanning until 31st October 2017. It is noted that 3 accidents have occurred within the immediate vicinity of the site, of which none can be attributed to safety issues within the highway. As a result of the low accident frequency, no further action is deemed necessary.

Sustainable Transport Accessibility

Bus & rail travel

As previously mentioned, the nearest bus stop to the site lies approximately 70m away on Hambledon Road, where a total of 3 stops are located. These stops provide access to a number of bus services with varying frequency, ranging from the Star 7, operating every 10 minutes, to the 37 which is an hourly service. A table demonstrating the available services is below:

SERVICE	ROUTE	WEEKDAY FREQUENCY
D1	Waterlooville – Hambledon The Gardens	Every 30 minutes
D2	Waterlooville – Denmead Green	Every 30 minutes
Star 7	Portsmouth – Waterlooville – Wecock Farm	Every 10 minutes
Star 8	Portsmouth – Waterlooville - Clanfield	Every 15 minutes
37	Havant - Purbrook – Waterlooville - Cowplain – Horndean – Clanfield - Petersfield	Every 60 minutes
39	Wecock Blackbird Close – Waterlooville – Purbrook – Bedhampton – Leigh Park – Havant Bus Station	Every 12 minutes

The star 7 and 8 route runs across the day with the services starting at around 5.30am and running till midnight Monday to Friday. Saturdays, Sundays and Bank Holidays have a similar level of service although starting later in the morning with the latest start time being 7.59am on Bank Holidays.

The Star 7 and Star 8 routes both serve Portsmouth QA hospital with a journey time of approximately 25 minutes.

The D1 route runs between Waterloooville and Hambledon. This route is only hourly and runs between 7am and 5pm. This is similar for the D2 route which runs between Waterloooville and Denmead. Currently, routes D1 and D2 are subsidised as a result of the Berewood development contributions, however this will end in January 2019. Given ongoing talks regarding the funding for buses, it cannot be assumed that funding for this service will be found after this time or that the route will be commercially viable. Discussions with the operators should be had to determine whether measures can be taken should the route not be considered commercially viable.

Route 37 runs between Petersfield and Havant and provides an hourly service. It does however provide a connection between Havant town centre and Waterloooville precinct between 7.30am and 7pm. Route 39 is a more frequent service which also provides access to Havant town centre and South Downs College.

Cosham rail station has been identified in the transport assessment as the most suitable location for multimodal trips via bus and rail despite its distance. However, no assessment has been carried out regarding the journey time for this route, this should be established.

Bedhampton and Havant rail stations are closer to the site but still considered some distance for cycling. An assessment should be undertaken of the cycling route and any measures required to encourage cycling identified in order to support sustainable travel to the site. In order to confirm the ability of the stations to accommodate additional cycling the number of cycle parking locations available should be ascertained along with the level of use.

Cycle Accessibility

Wellington Way is situated between a local and national cycleway which provide a continuous route into Waterloooville and other nearby locations. Provision of cycle infrastructure to link to these existing routes should be identified to both promote cycling from the site to key destinations and improve the safety of those choosing to cycle.

Walking Accessibility

Given the site's central location within Waterloooville town centre, walking distances to key amenities are low. Pedestrian crossing facilities currently serve Hambledon Road and provide a direct route through to the ASDA store located to the east of Maurepas Way. A signalised pedestrian crossing is provided across the A3 for those wishing to access Sainsburys or the wider business park.

Other key locations are included within the TA, demonstrating that walking distances are low and therefore acts as an attractive method of travel to a number of locations around Waterlooville.

Car Parking

Car parking is proposed for 18 spaces on-site, with a further 50 permits available for residents to purchase for local car parks (Wellington Way and Rockville Drive car park). Generally parking matters are dealt with by Havant Borough Council. The Highway Authority only comment on the impact of any parking on the safe operation of the highway.

Within the application no justification has been provided as to the number of parking spaces proposed or the way in which these parking permits will be allocated. The permits would be available to allow parking within the allocated car parks between 18:00 and 08:00 hours. There is no guarantee of a parking space however at this time. Parking charges in the area are currently only charged between 08:00 and 18:00 hours Monday to Saturday. The permits will therefore have limited value without additional parking charges being applied. There is a restriction during the charged times to a maximum stay of 3 hours. With this restriction in place on a Saturday clarity is sought from the applicant on the proposed parking arrangements for residents outside of these permit hours including on a Saturday.

Whilst it is noted that car ownership is considered by the applicant to be lower for the location and type of development, the number of spaces proposed cannot be agreed until justification has been provided as to the number of spaces, and also the way in which these permits will be allocated. Census data has been assessed within the application and demonstrate that car ownership for the area and development type to be 0.56 cars per dwelling which equates to 148 vehicles.

It is vital to establish how resident parking will be managed outside of the permitted times and how the development can ensure that there is no negative impacts from overspill parking.

Cycle Parking

265 cycle parking spaces are provided for residents of the development and a further 6 short stay spaces are proposed for visitors of the gym/café. A rental cycle system is also proposed, which will be available from the building management team. Details of how this will be managed and secured in the long run should be provided. This provision must also be supported by good cycling connectivity and this should be reviewed and evidenced to support the application.

Car Club

Two interested companies have made proposals regarding a potential Car Club for the development, with bays to be provided on site to accommodate for this. Similarly to the rental cycle system being proposed, details of how this will be managed in the long run should be included to ensure this ongoing

service is maintained. Details are also required relating to the number of vehicles which will be stored onsite as this will impact on the number of car parking spaces required.

Site Access

Vehicle access to the site is only expected for those working at or servicing the building. It will also access parking spaces for the car club. It is proposed to maintain the existing service access to the site although with changes to make it shared space. Additional information is required regarding this arrangement including expected number of pedestrian/cycle and vehicle movements. A clear drawing showing the arrangement here should be provided.

Swept path drawings have been provided for a super large refuse vehicle and a 10m rigid lorry. These demonstrate that with the access arrangement as proposed there is limited space for a vehicle of this type to pass a pedestrian or cyclist. The design should be amended to allow two cars to pass each other and sufficient space for a large vehicle to pass a pedestrian/cyclist.

Trip Generation

Trip rates for the site have been derived from the TRICS database. Two way AM peak hour vehicular trips are proposed at 49 and 52 in the PM, with daily vehicle trips totalling 520.

The data provided however cannot be considered to be representative of the type of development proposed. The rates obtained are for 'Affordable/Local Authority Flats' and not for privately owned/rented properties. In addition the range selected is for development smaller in scale and the data is outdated with the range being between January 2009 and January 2015.

The sites themselves can also not be considered to represent the Waterloo area. For example Wellington Road in Brighton is within a 20 minute walk from a Brighton railway station and Brighton city centre. The same can be said for the site in Winchester. None of the developments within TRICs are of a similar size or scale.

The trip generation data therefore must be reviewed in order to ensure a realistic estimation of trip generation can be established.

No additional trips have been assessed for the proposed gym and café. An assessment of the level of trip generation from these sites should be provided as they have the potential to be trip attractors.

Trip Distribution

Distribution of trips from the site has been derived via travel to work census data and proposes that the majority of people travelling to work will either go to Havant (39%) or Portsmouth (30%). 12% of the total residents work within the Waterloo area. This equates to 29 people. Given the central location

of the development it is acknowledged that these people are more likely to walk or cycle to work.

There is a potential for travel to Portsmouth to be undertaken via the Star bus services from the stop on Hambledon Road.

However there are still going to be vehicle trips on the network and these have not been assessed and the distribution established to understand the impact on the highway network. This work should be undertaken to support the assumptions within the application.

Traffic Impact

The impact of the development must be carefully considered. Whilst it is acknowledged that the presence of the Star services creates an attractive transport mode based on the evidence provided to date there will still be significant vehicle movements from the development. Whether these are by privately owned cars, taxi's or from the car club these trips will still be new to the immediate network. Consideration must be given therefore to the impact of the development on the surrounding highway network.

Travel Plan

The Travel Plan (TP) supports a residential-led mixed use development of 264 studio apartments as part of the redevelopment of Wellington Way Shopping Centre, Waterloo. It is understood that the TP is in support of an application for full planning consent, and hence the document should be entitled 'Travel Plan', 'Interim Travel Plan' or 'Residential Travel Plan', rather than 'Framework' Travel Plan.

The travel plan has given some thought into the measures which seek to maximise the potential of sustainable travel opportunities. Notwithstanding this there are omissions in the TP which need to be addressed for it to be acceptable:

- The measures are quite narrowly reliant on the provision of cycle parking, reduced car parking and car club promotion. Evidence should be provided of liaison with local cycle shops, bus companies and measures to encourage walking and public transport.
- Work is also required to demonstrate that the TP will be marketed effectively to residents and prospective buyers.
- Although they have been defined as outside the scope of the TP, this is a good opportunity for the applicant to commit to cycle parking for the café and gym. It is reasonable to assume a proportion of trips to these facilities will be external to the development.
- Management and funding of the Travel Plan needs further consideration and detailing, particularly in terms of an indicative budget for measures and Implementation Plan items and consultation with residents.

Introduction

The introduction must be amended before the TP is acceptable.

Since the TP is in support of an application for full planning consent, this should not be titled as a 'framework' Travel Plan, but 'Travel Plan', 'Interim Travel Plan' or 'Residential Travel Plan'.

A small gym and café are included on the ground floor of the development for the use of residents and public. The TP states that trips to these facilities are likely to be internal from the development and hence the TP focuses on the tenants of the residential element of the application. This is considered acceptable, but it is suggested that the TP (and Transport Assessment) offer a good opportunity to encourage sustainable access to these developments for the proportion of non-internal trips.

In addition, it would be beneficial to see a clear statement of the motivation for the TP. This could refer to maximising the site's potential for sustainable access, or supporting the relatively low level of car parking proposed. Provision of likely construction and opening dates would also be helpful.

Policy and Best Practice

This section is welcomed and is acceptable – reference to HCC's 'A Guide to Development Related Travel Plans' (January 2009) would however be beneficial.

Summary of the proposed development

This section is considered acceptable – a good description of the site is provided, with a focus on parking and access, and a ground floor layout plan is attached in Appendix A.

Sustainable Transport Infrastructure

This chapter is considered acceptable. An appropriate level of detail is provided on bus, train and cycle connectivity, together with a location plan, cycle and bus routes.

Base Position

This chapter needs firmer dates and targets. Modal share has been extracted for Waterlooville from the National Census Method of Travel to Work Data. This is helpful in establishing a baseline for the Travel Plan and interim targets. Commitment is made to undertake TRICS-compliant travel questionnaire surveys after occupation. The following points should also be included:

- A realistic timescale for implementing the survey. This could be based on a % occupancy which should be stated.
- A % response rate to be achieved and measures to meet this target.
- A management strategy for the Travel Plan should be set out, through for example a TP steering group/ resident's forum. Such a forum has good potential given the low level of parking provided and a potential demographic of younger residents. Establishment of a forum should be added to the TPC's responsibilities and the Implementation Plan.

Travel Plan Objectives, Benefits and Measures

This chapter is not acceptable. The over-arching aim of the TP is however clearly stated and supported by six appropriate objectives. The range of benefits the TP will give to residents and the wider community is also set out.

Baseline Data

Given that the baseline data shows car drivers to account for 68% of employed adults and only 25% parking provision is provided for the units, there is considerable work to do in terms of modal shift and this should be reflected in a range of measures. This will also help minimise the potential for informal parking in the area.

Travel Plan Coordinator

Commitment is made to appoint a Travel Plan Co-ordinator (TPC) prior to occupation of the site to act as a point of contact for residents, develop and implement Travel Plan measures, promote the Travel Plan, monitor progress against agreed targets and report to HCC officers. No commitment to fully fund the Travel Plan by the developer is made however and a budget for the TPC work should be provided and be reflected in the Implementation Plan section. Indication should also be provided on the time commitment being made for the TPC role.

In addition to the duties outlined for the TPC, there is an opportunity for a wider consultation with residents on the TP. Information from such a consultation would help inform the TP measures and targets.

Walking

Walking is identified in the Travel Plan as offering good potential. No specific measures are however suggested to encourage this mode. It is recommended that a plan showing key local facilities and their walking times is provided in the Welcome Pack.

Car Sharing

As described in the TP, there is good potential for car sharing at the site. Whilst the developer has committed to providing car club credit to each tenant, use of a car club by residents can be bolstered by a firm commitment on the number of car club spaces to be provided at the development.

Cycling

Rental bicycles will be made available for residents, together with 265 secure parking spaces and a further secure cycle parking area for visitors. Cycling offers a potential for modal shift at the development and should be enhanced by:

- Promotional material, discounts and offers from local cycle shops
- Access to cycle parking for users of the gym and café

Public Transport

There is also the potential for access by public transport. It is recommended that the consultant approach local bus service operators to obtain promotional

discounts for residents, such a measure should be appealing to prospective buyers given the lack of parking spaces for most residents.

In addition:

- No information is provided on encouraging smarter working measures.
- There needs to be mention of the 'My Journey Hampshire' journey planner <http://www.myjourneyhampshire.com/> in the TP as this is a useful and free resource which could be publicised.
- The development sales suite should promote the TP as part of the sale of the residential units. People looking to move should be able to see the TP and the TP measures as an asset to the development – particularly given the low parking provision.
- Provision of welcome packs upon first occupation is welcomed, however what information will be provided to residents further down the line? The following should be considered and committed to where appropriate:
 - Newsletters
 - Website
 - Messaging
 - personalised journey planning
 - notice board
 - travel plan forum

Monitoring and Targets

This section is acceptable. The TPC will monitor the TP through surveys undertaken one year after implementation and every two years subsequently for 5 years which is acceptable.

Preliminary annual modal shift targets are provided, starting with the baseline census data. Some justification is provided on how these targets have been developed with regard to existing travel behaviour and realistic potential for modal shift.

Action-type targets have been provided within an Implementation Plan as described below.

On-going Implementation, Monitoring and Review

This section is not acceptable. An implementation plan is provided which includes key actions for the TPC and other stakeholders.

Actions to be undertaken if the TP targets are not being met are set out. The following issues need to be addressed:

- The occupancy threshold for TP implementation and first travel survey should identified.
- In line with HCC Guidance, a summary of survey information needs to be provided to the Council on a standard form. An on-line survey facility is available via the County Councils Travel Plan monitoring system – iTrace. The Developer should contact the County Council's Travel Plan Adviser for further information.

- Indicative costs should be provided alongside the Implementation Plan measures to give comfort the costs of the Travel Plan have been understood and agreed by the developer.
- The Implementation Plan should be updated in the light of other recommendations on TP measures and management as set out in this review

Summary

This TP is currently not acceptable and it is our recommendation that the above comments are addressed prior to the acceptance of the TP. Further detail needs to be provided, particularly in terms of the TP management, consultation with residents and funding. A wider consideration of hard and soft measures is required if the interim TP targets are to be considered appropriate. Additional 'soft' measures are required to ensure that the TP will be effectively marketed to residents and potential buyers. Please refer to individual sections of this report for more details.

When responding to the above comments in a revised travel plan, the applicant must make reference to the sections and paragraphs of the travel plan where each specific point has been addressed.

Recommendation

Additional information is sought from the applicant relating to the following:

- The Site Access
- Sustainable travel routes
- Car parking
- Car and Cycle Club details
- Trip Generation
- Trip Distribution
- Traffic Impact
- Travel Plan

If you are minded to determine the application before this additional information is submitted, I would request that the application is refused for the following reasons:

- In the opinion of the Planning Authority the proposal involves development that cannot be reconciled with the National Planning Policy Framework in that the significant movements generated could not be accommodated adequately on the existing transport network. This would result in a severe impact on the road safety and operation of the local transport network contrary to the NPPF and DM12 of the Havant Borough Council Core Strategy.
- In the opinion of the Planning Authority the proposal involves development that cannot be reconciled with the National Planning Policy Framework in that proposed access(es) are inadequate to

accommodate the development safely. This would result in an unacceptable impact on the safety of users of the development and adjoining highway contrary to the NPPF and of the Havant Borough Council Core Strategy.

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

Ben Clifton
Team Leader

CC Peter Marshall, Development Engineer, HavantBorough Council