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<i>Date</i>	05 June 2018	<i>Email</i>	Anna.Li@hants.gov.uk

For attention of David Eaves

Dear Mr. Eaves,

Mixed use development comprising up to 100 new homes, including up to 40% affordable, 2860 sqm of employment floorspace and improved access onto New Lane and Martin Road. On-site parking for residential and employment uses will be provided. (full details to be submitted at a later stage).

Thank you for the opportunity to comment on the above application. The applicant is seeking an outline planning permission with all matters reserved. Following a review of the Transport Assessment (TA) and associated information submitted in support of the application, the Highway Authority wishes to make the following comments.

Policy Review

The Transport Assessment (TA) states the policy background to the proposals, and provides a summary of national, regional and local policies and supplementary planning documents referred to when the TA was prepared. The HA considers that the policies being referred to are appropriate and sufficient for assessing the highways impact of the proposed development.

Existing Conditions

The existing transport conditions were reviewed within the TA. Routes and frequencies of buses and trains were summarised in the section. In terms of the condition for walking and cycling, the TA has stated footpaths/ footways, cycle routes near the site and locations of local amenities and their distance to

the site and shown these on Figures 3.2 and 3.3. However, the details of existing crossings for pedestrians and cyclists have been omitted, as it failed to recognise the current unsatisfactory situation of the following:

- No crossing linking the access on Martin Road to the footpath around West Leigh Skatepark, St Alban's Church and the footpath on the western side of Martin Road;
- No crossing near the site access on New Lane to connect with the existing footpath & cycle route on New Lane;
- No direct and safe crossing on Bartons Road to link the site with the footpath leading to Sharp Copse Primary School; the TA failed to spot that the existing crossing on Bartons Road is not on the desire line for the proposed development site, hence it is unlikely to encourage the pedestrian and cyclists to use it.
- No cycle way along Bartons Road near the site frontage to connect the site into the existing cycle network on New Lane and proposed onward connections to be delivered through permitted development within the area.

All these issues should be clearly identified and addressed in this section.

Site Access

The submitted masterplan (Drawing No.A090070-182(ST1)51 Rev A) shows a total of three vehicular accesses are proposed for the site. Two accesses for the residential part of the development are proposed from Martin Road and one access for the employment aspect is from New Lane. It is stated in the TA that both the Martin Road and New Lane accesses will provide adequate space for refuse and emergency vehicles however neither detailed plan nor refuse vehicle tracking has been submitted.

Based on the masterplan, all three accesses appear to be in the same locations as the existing accesses. The HA does not object to the provision of vehicular accesses in the existing locations, however we would not support the application should the access arrangement be changed to directly onto Bartons Road, due to this road being main distributor road and the proximity of New Lane and Martins Road. The access locations will therefore be required to be secured through conditions on the application.

It is noted that the site access is a reserved matter for detailed consideration at full planning application stage. However, the highway authority recommends that additional information is provided at this stage to adequately demonstrate that the access points proposed provide safe and suitable

access. To that end, it is recommended that visibility splays supported by speed survey and tracking analysis for refuse vehicles is provide now so that the location of the access points can be approved now.

Walking and Cycling

The master plan shows that footways would be provided at all three vehicular accesses. Additionally, pedestrian paths are provided within the site for both residential and employment areas.

The HA does not object to the provision of footways and paths but considers the width for the internal paths should be designed to allow shared use between pedestrians and cyclists.

Furthermore, the master plan shows a path would be provided to link with the southern side of Bartons Road opposite the path linking to Sharp Copse Primary School on the northern side of Bartons Road. The developer should take the opportunity to provide a crossing that is suitable for both pedestrian and cyclists to cross Bartons Road safely. This improvement would be required to cater for increased pedestrian and cyclist movements.

The change in use of this site will result in an alteration in the type of walking and cycling journeys undertaken. The applicant must consider this with regards to the facilities within the area and additional infrastructure requirements as a result. There is an existing segregated cycle route on Petersfield Road to the west of the site and proposals under permitted development for a shared use path between the garden centre and New Lane. Connecting the proposed development with this infrastructure will need to be considered and appropriate infrastructure improvements secured.

Personal Injury Accident Data (PIAs)

Personal Injury Accident data for the period from 01/11/2011 to 31/10/2016 has been analysed in the TA for sections of Bartons Road, Martin Road and New Road near the site. It is stated in the TA that no accident have subsequently occurred in the study area in 2017. However records show that one more accident occurred at 18:25 on 17/01/2018 at the bend of Martin Road opposite West Leigh Business Park. This accident was classified as a “serious” accident and occurred due to driver lost control.

Based on the TA study, during this five year period, there were a total of 15 recorded accidents. 4 of these were classified as “serious” accidents with the remainder of the accidents being classified as “slight”. No fatal injuries have occurred. The majority of accidents recorded were attributed to factors such

as loss of control and poor driver judgement/error rather than any identified deficiency in the road layout itself.

However there have been three accidents which took place at New Lane junction involving interaction between cyclists and cars. This pattern could be mitigated through formal crossing for cyclists on Bartons Road. Should the applicant agree to widen the footway adjacent to the site, and provide a crossing suitable for both pedestrians and cyclists, it would improve the safety of this right turn movement.

In summary, the data presented within the TA indicates that it is unlikely that the development and associated traffic generated by the development will significantly worsen the existing highway safety of the surrounding highway network if the improvements to the walking and cycling infrastructure as described above are delivered.

Trip Generation and Distribution

The TA presents the proposed vehicular trip rates that could be expected for the proposed development during both the AM and PM weekday peak periods (0800-0900 and 1700-1800). The HA is concerned that vehicular trip rates estimated for the affordable housing are too low. For robustness, these should be the same as the vehicular trip rates for private housing.

Trip distribution is obtained based on the existing flow proportions which were derived from the manual classified traffic counts surveys at each junction.

The HA is concerned about this method due to the fact that the northern end of both Martin Road and New Lane are not currently dominated by residential developments, therefore the surveyed traffic data is unlikely to represent the residential trips distribution correctly. The applicant should use a different method i.e. the census data “journey to work trips” (2011) to obtain the distribution for residential trips and to validate the distributions obtained from the survey data.

Traffic Impact Assessment

The TA assesses future year 2023 traffic condition for both AM peak (8:00-9:00) and PM peak (16:00-17:00). It's worth noting the time defined for PM peak here is different from the one defined in the earlier section of “Trip Generation” which is (17:00-18:00). This needs to be clarified.

Based on the TA, traffic surveys were carried out during school term time on 8th March 2017 to obtain vehicle turning movement data at following junctions near the site.

- Martin Road/ Bartons Road
- New Lane/ Bartons Road
- Martin Road/ Site Access
- New Lane/ Site Access

The growth rate figures for this area were then applied to the surveyed data to estimate the level of traffic flows in the network in 2023. Using the “growth” surveyed traffic data, junction modelling was undertaken to assess the traffic impact at the above four junctions for 2023 with and without development traffic.

The HA is concerned that traffic impact assessment has not been carried out to the requirements of HCC or guidance of NPPF which clearly states that *“The assessment years should consider person trips from all committed developments that would impact significantly on the transport network, particularly where they substantially overlap, such as at the same junctions and/or on roads as the proposed development. The committed developments will typically include development sites that have extant planning permission as well as development plan allocations in an adopted or approved plan.”*

Based on this guidance, traffic impact assessment should also include the following two committed developments and the two additional junctions.

Junctions:

1. Bartons Road/Comley Hill/ Emsworth Common Road
2. Bartons Road/ B2149 Petesfield Road

Committed development:

1. Approved developments at land south of Bartons Road (APP/15/01435)
2. Approved development at Land north of Bartons Road (APP/14/00863)

The applicant is required to undertake modelling tests for all six junctions for following scenarios:

- Existing traffic at base year 2018
- 2023 Base traffic + traffic of committed development
- 2023 Base traffic + traffic of committed development + proposed development

Traffic Modelling

Base year AM peak modelling work has been reviewed. It appears that some of the geometry data has been put in the model incorrectly. In order, to understand how the geometry data was measured, the HA recommends that the applicant submits the drawings to show the measurements of the geometry data.

Travel Plan

The Framework Travel Plan (FTP) supports a development of 100 dwellings and 2,860 sq.m. of commercial floorspace. The FTP is clear and concise, but there remain a number of omissions which should be addressed at the framework stage. The headline improvements that are required are as follows (with additional comments and recommendations in the body of the report):

More information on the type of uses on site and the illustrative master plan should be included to ensure the right measures are brought forward.

- Detail on the walking route to the local centre on Somborne Drive should be provided, highlighting any gaps or deficiencies, as this will be key to increasing pedestrian modal share.
- Indication should be included on how much time the TPC will dedicate to this particular development and a clear commitment to marketing the Travel Plan and communicating with users through a website should be made.
- Interim modal shift targets have been set for an increase of 50% on the cycle mode share baseline. Additional measures to encourage cycling will be required to achieve this target.
- An Action Plan is required to clearly set out what will be undertaken by which time, and who will be responsible.

Introduction

The introduction must be amended before the FTP is acceptable.

Whilst the name of the developer responsible for Travel Plan is provided, along with suitable objectives which reference wider community benefits, there is no reference to the developer's policies on travel plans/sustainable travel.

In addition, it would be beneficial to see a clear statement of the motivation for the TP. This could refer to improving access to the site or making use of nearby bus and cycle routes. Provision of likely construction and opening dates would also be helpful.

Existing Conditions

This section is not acceptable. There are some key omissions relating to walking and there is almost no detail of the likely uses on site.

Good location plans are provided as well as sufficient information on bus services and train services. Bus services in particular offer potential as the stops are within 400m of the site entrance.

A good summary of the local facilities within walking distance of the site is provided. A plan showing the locations of these facilities should however also be provided in the FTP to ensure the potential for this mode can be adequately determined. As many of these facilities look to be in the local centre on Somborne Drive to the west of the site, a description of the walking route from the development should be included in the FTP along with any gaps or inadequacies identified.

Whilst this is a Framework Travel Plan for an outline application, no information at all is provided on the type of dwellings or commercial space to be provided. Even basic details such as whether apartments or houses are proposed and whether the commercial space will be B1, B2 has an important role in shaping the plan. Section 3.18 notes that there is an illustrative master plan – this should be provided as an appendix to the FTP. The proposed number of parking spaces, parking policy and any demand management for parking should be included in the FTP.

Proposed Travel Plan Measures

This section is not acceptable. Stronger commitment is required on a website for the Travel Plan, and additional measures are required for cycling.

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. The TPC will be a specialist external consultant, funded by the developer, working part-time, and will be appointed at least three months prior to occupation. Indication should be provided on the time commitment being made for the TPC role as part of the FTP.

Provision of Information

The proposed provision of information is acceptable. The proposal for a steering group to allow residents and employers to provide regular feedback to the TPC is to be welcomed. Mention is made of 'a regularly updated website to inform and engage with residents and businesses; and attendance at local community and workplace groups by the TPC'. The language of the FTP needs to be strengthened here to commit the developer to such a website. This will ensure the continued provision of information and feedback following the initial Welcome Packs.

The full Travel Plan should include provision of a noticeboard in addition to the website.

The full Travel Plan should include mention of the 'My Journey Hampshire' journey planner <http://www.myjourneyhampshire.com/> as this is a useful and free resource which could be publicised.

Walking

Further measures to encourage walking should be considered .

Cycling

As noted in the existing conditions section, National Route 22 can be accessed via Bartons Road and provides access to the centre of Havant. Measures to improve the cycling network on Bartons Road need to be considered. Furthermore, as referenced in the National Census data, cycling makes up 4% of residential trips and 5% of employee trips in the area. The FTP should be clearer about the nature and volume of cycle parking for residents and employees. In addition to cycle parking, showers, lockers and changing facilities should be provided for employees on the site. Consultations with a local cycle store should be initiated as part of the FTP.

Public Transport

Measures to encourage use of public transport are should be considered further. The full Travel Plan should specify the time period and value of the bus vouchers proposed for residents and employees. Consultation with the local bus operator can be detailed in the full Travel Plan.

Car Sharing

Measures to encourage car sharing are considered acceptable. The full Travel Plan needs to be mention of the web address for the Hampshire car sharing network www.hants.liftshare.com in the measures section.

No information is provided on encouraging smarter working measures which include Working from Home, Flexible working times, relocation closer to work, on-site creche, shop etc. These should be covered in the full Travel Plan.

Monitoring and Targets

This section is partially acceptable. The TPC will monitor the TP though surveys which will be undertaken 3 months after 50th occupation of the dwelling, and then annually for five 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. With the existing residential modal share of bicycle at 4% and considering that the site is located within a well-developed locality with easily reachable destinations, a 2.5 % increase in the share seems ambitious but possible as long as additional measures to encourage this mode are provided, as noted above.

Similarly, since the site is a mixed-use development, there would be ample opportunities for residents and commercial users to share their journeys on a regular and/or infrequent basis. As such the car sharing target of 11.5% seems reasonable.

In terms of walking targets, enough evidence is lacking in the TP to understand the quality of footpaths/ safe crossings as explained earlier. At the moment, the proposed 2.5% increase seems unrealistic unless further information is provided.

No Action Plan has been provided in the TP. An Action Plan should be provided detailing mode-wise action targets and methods of monitoring covering all the sustainable modes of walking, cycling, public transport and car sharing. The action plan should include funding and responsibility for each action, which is a required element. The action plan must be revised in line with the comments noted above. The measures in the action plan need to be spread throughout the life of the travel plan as well as at initial occupation in order to ensure that the targets are met.

Commitment is made to undertake travel questionnaire surveys after occupation at certain intervals but their compliance with TRICS is missing and should be included.

The inclusion of remedial measures is acceptable and is welcomed.

Whilst a section on funding is included, an indicative budget should be included in the FTP, and detail on how the various measures will be funded throughout the five-year span of the plan. This detail should also be reflected in the Action plan.

Recommendation

This FTP is currently not acceptable and it is our recommendation that the above comments are addressed prior to the acceptance.

Of particular note is the need to provide more details of the proposed uses on site, parking and cycle parking. An Action Plan is also required to clearly set out when measures, monitoring, liaison with HCC and appointment of the TPC and steering group will be undertaken. The Action Plan should state who is responsible for each action and include an indicative cost.

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.

Transport Contribution - Section 106 Agreement

As mentioned earlier, trips generated by the committed developments should also be included in the traffic assessment within this TA. Should the results of the assessment show that the impact to the local transport network is significant, the applicant is required to mitigate such impact caused by the proposed development via entering into a S106 agreement with the HA. The change in use of this site will result in an alteration in the type of walking and cycling journeys undertaken. The applicant must consider this with regard to the pedestrian and cycling facilities within the area and additional infrastructure requirements as a result.

Recommendation

Having regard to the above, the highway authority would recommend a holding objection until further information is submitted and the above concerns are addressed satisfactorily. However, if you are minded to determine the application prior to receiving the required further information, please do contact the highway authority for the refusal reasons.

I trust that the above is clear but please contact Anna Li on the above number should you need further information.

Yours faithfully

Ben Clifton
Team Leader – Highways Development Planning

Cc: Peter Marshall