



Hampshire County Council

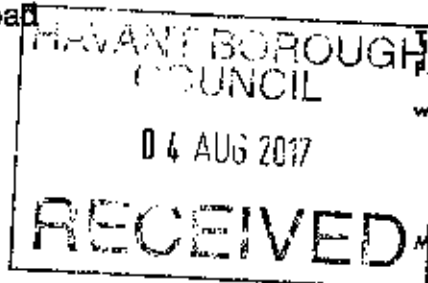
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Enquiries to

Holly Drury

My reference

HD 6/3/13/184 (APP1469)

Direct Line

01962 826996

Your reference

APP/17/00656

Date

1st August 2017

Email

Holly.drury@hants.gov.uk

For the attention of L Oliver

Dear Sir,

Land South of Manor Road, Hayling Island: Erection of a discount foodstore with associated parking and landscaping and new vehicular and pedestrian access to Manor Road.

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

The application is for a 2186sqm discount food retail store on Greenfield land to the south of Manor Road and west of Church Road, Hayling Island.

Traffic Data

Automatic traffic counts were undertaken on Manor Road between Wednesday 16th November and Tuesday 22nd November. The findings of the survey have been summarised but the raw data has not been provided for review. This should be submitted in support of the application. The distribution observed from the recorded traffic flows of 59% of movements eastbound and 41% of movements westbound has been applied. This methodology cannot be agreed however without a review of the data collected. Due to the tidal nature of traffic flows on the A3023 at peak times there is the potential that this split may not be appropriate during the assessed peak hours.

Parking

Matters relating to the internal layout and parking are dealt with by our Agent at Havant Borough Council. A separate response on these matters will be provided to the Planning Authority.

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

Trip Generation

In order to determine an appropriate trip rate for the site TRICs data has been assessed for the weekday peak periods. A survey of an existing store in Wokingham has been used to determine the Saturday peak flows. There however is no detail on the stores, discussion on why they are suitable comparisons or robust reasons for why different methodologies have been used for the Friday and Saturday peak periods. The proposed store in Hayling Island is in a fairly unique location and robust consideration of the trip generation given the sensitivity of the A3023 is required.

The TA refers to the Saturday local peak hour flows being greater than the weekday peaks however the survey data has not been provided to establish whether this is agreed. The network also experiences a peak at school collection times which can be greater than the evening peak in some locations. So that peak periods requiring assessment can be identified the survey data will need to be provided to the highway authority.

The Retail Assessment acknowledges that a discount food store does not have the same offer as the larger retail areas, yet the Transport Assessment assumes that 69% of trips will be pure transfer and not new trips on the network. This is not considered robust by the Highway Authority. Whilst some of the retail value of the trip will be transferred to the new store additional or chained trips will occur to other food retail stores who offer complimentary facilities to Lidl. The proposed figures for pass-by and transferred trips relevant to this particular site need to be justified further against an evidence base. The current evidence reviewed is dated and the percentages shown within the reports cannot be generically applied as they have been here. Site specific justification is necessary. The remaining trip generation after agreeing a suitable percentage for pass-by and transferred are then naturally considered to be new on the network. Network diagrams demonstrating the assumptions made will be necessary to support the application.

Finally there have been no trip generation proposals for staff and this should be considered and set out within the TA.

Background Traffic Growth

To account for background traffic growth a forecast year of 2021 has been applied. This is not acceptable since the application has been made in May 2017 and therefore the forecast year should be 2022 to meet the 5 years post application requirement.

In addition given the sensitivity of the A3023 for unallocated residential applications we have required sensitivity testing of the network to 2036 and assumed all housing allocations within Havant's Local Plan Housing Statement for robustness be manually added to TEMPRO forecast traffic growth. The same approach would need to be undertaken at this unallocated site when assessing the transport implications. Details on the selection criteria for TEMPRO and the manual assumptions will need to be provided to support the application.

The residential applications have also been asked to review in modelling terms the impact on the A3023. This development varies from residential as

not all trips can be assumed to be new to the A3023 therefore the network diagrams will need to be reviewed to determine whether the level of additional flow on the A3023 could be considered significant enough to require this level of analysis. This matter will need to be discussed further when the information is available.

Trip Distribution

Consideration with regards distribution has been given to the Hayling West and Hayling East wards. It is not clear how those residents coming from the North of the island have been accounted for. The catchment area included within the retail assessment is for the proposed development is for the whole island and therefore trips from the north need to be considered.

Paragraph 5.18 within the TA refers to how the pass-by and transferred trips have been considered on the network and whether they should be considered additional trips. This is dependent on where the trip generates. For those that live to the north of the Manor Road/Church Road roundabout that transfer from Aldi to Lidl would be new trips on the roundabout junction. However those that come from the southern end of West Lane transferring from the Aldi store for example would be a reduction at the Manor Road/Church Road junction. Network diagrams are therefore required to clearly show the assumptions made.

Site Access

It is proposed that the development site be accessed via a simple T junction onto the A3023 along with a separate pedestrian access to the northeast of the site.

The proposed junction form is not appropriate for the current or forecast level of flow on the A3023. The ATC data collected show average flows which would support this junction type however the forecast development flows as presented demonstrate that the average daily two way flows will considerably exceed 300 per a day and therefore a ghost island right lane will need to be explored. Given the nature of the A3023 and delay that right turners will cause in the peak times it is felt that a right turn lane would be beneficial to keep flow on the major arm unimpeded.

The proposed bellmouth arrangement has been tracked for delivery vehicles. These vehicles are not able to safely negotiate the junction in its current form. The junction design would be helped through limiting of movements by HGV's at the junction. In reality deliveries will be from the mainland and therefore turning left in and right out. A planning restriction could be placed on the site to only permit deliveries from these movements. This would aid with difficult movements demonstrated such as turning left out where a vehicle would be required to swerve to avoid the lorry. In addition right turners in to the development enter the access road on the incorrect side in order to negotiate the internal layout. As currently stands for any movements a car could not pass a turning lorry into the site and this will cause conflict internally.

Due to the above the site access arrangements need to be reviewed. A Road Safety Audit must also be submitted to support the site access proposals.

Junction Assessments

As the trip generation and distribution has not been agreed specific comments cannot be made on the operation of the junction of Manor Road/Church Road or the site access.

It is noted however that paragraph 6.2 refers to a reduction in overall trips at the peak times. This may be the case for the A3023 further north but will need to be carefully justified and reviewed against where the trips have started from. As previously outlined in some cases trips within the island road network may be increased.

Confirmation of a traffic flow figures applied to the site access is also required. It is unclear whether the reductions in traffic flows mentioned in paragraph 6.2 have been applied to the site access. Traffic is actually only going to increase on this section of Manor Road and this should be reflected within the modelling work.

A review of the additional flow from the development on the A3023 to 2036 as already discussed will also need to be provided within this section of the TA.

Sustainable Modes of Access

Train

Access to the store by rail is unlikely to be a suitable option for staff or visitors to the store due to there being no railway station on Hayling Island. This is acknowledged within the TA. However in table 6.3 it is proposed that development trips will generate journeys by train/underground. Given the lack of rail facilities on Hayling Island, this needs to be reviewed. Details of the ward information used should also be provided.

Bus

Bus stop provision is on the A3023 north of the development past the Church Road Roundabout. Whilst these are within a 400m walking distance for residential development they are considered to be too far to make this mode of travel to the store attractive. Therefore given that the bus service currently runs across the front of the site new bus stops should be provided within the revised layout of Manor Road. If it is possible to accommodate the bus stops with layby's these should be provided to reduce delay on the A3023 at peak times.

Walking and Cycling

There are existing footway facilities in the area with a footway on the southern side of Manor Road adjoining the site. It is identified within the TA that walking to the development from residential areas is within a distance of 2 miles and this should be considered acceptable. This however is beyond the recognised acceptable walking distances of 800m with a preferred maximum of 1200m.

In order to encourage walking and cycling trips therefore the existing infrastructure needs to be improved to provide additional connectivity to the site. This includes providing suitable crossing facilities to the existing footway.

There is a large residential area off West Lane. Currently there are no crossing facilities of Manor Road at the Brights Lane junction. The provision of a refuge island crossing should be explored by the applicant.

Cycle connectivity to the site is also poor. There are no off road facilities on Manor Road and the road itself is subject to a 40mph restriction. This along with the traffic flow on Manor Road does not create a welcome cycling environment. A particular difficulty would be for cyclists to turn right into the development site from Manor Road. The applicant should therefore review and consider the potential for off road provision for cyclists to access the development site. This should not only be from Manor Road but from Church Road and Havant Road directions also. From our review of the site there is scope to remove cyclists from the carriageway prior to the A3020 /Church Road roundabout and provide shared use paths to connect to the site. In association with this a review of how cyclists from the south of the island travelling on Manor Road access the cycle parking also needs to be considered. There may be suitable justification to consider reviewing the cycle parking location to better serve all access points.

Personal Injury Accident Data

No personal injury accident data has been provided. The extent of Manor Road should be checked from and including Brights Lane to and including the A3023/Church Road roundabout. Narratives of the accidents should be provided from Hampshire Constabulary on any accidents within this area along with a review within the TA on how these accidents have been considered within the design.

School Drop Off Facilities

The travel plan refers to the inclusion of a 90 minute parking restriction for Lidl shoppers only. We are aware that discussions at the pre application stage with the Planning Authority were had regarding making the car park available for park and stride to Mill Rythe School's. This is considered to add wider benefit to the community for the site and help relieve congestion on the network at school peak times. The applicant should include a commitment to allow for this from the site to mitigate the daily traffic impact of the proposed development.

Travel Plan

The Travel Plan (TP) has been assessed using Hampshire County Councils (HCC's) evaluation criteria for the assessment of travel plans -"A guide to development related travel plans." The travel plan is generally of a good standard but there are a few areas that need addressing before it can be approved for the proposed development.

Consultation and Partnership

It is stated within the Travel Plan that the Travel Plan Coordinator (TPC) once appointed will investigate the opportunity to provide discounted public transport tickets, bicycles and equipment to employees. Whilst it is understood that it is not possible to undertake such consultation and partnerships with public transport operators and cycle shops at this stage, evidence of such

consultation would need to be provided at a later date. Commitment should be demonstrated to work with other local businesses also developing travel plans.

Site Audit

The existing site audit is clear and the details within the travel plan document are accepted – however, the plan does not show where lockers and showers will be delivered.

Only the 31 bus service would support staff travelling home after the close of the store Mon-Sat, and the closest bus time is 22:40; staff using the bus should be afforded a space where they feel comfortable to wait for this bus.

Targets

The targets set out in the Travel Plan are based on Census data (2011) for the combined Hayling Island area, which is considered appropriate at this stage.

A target to reduce single occupancy vehicle (SOV) trips by 10% from the baseline has been identified and corresponding targets for other modes e.g. walking, cycling, public transport have been set. This approach is supported.

Measures

A number of appropriate measures have been identified which are suitable to the nature and type of the development; however, there are a number of points which require addressing as set out below. Whilst it is recognised that these measures are not obligatory, they would be considered beneficial for this Travel Plan.

- It is noted that staff will be discouraged from parking on site, mainly as a result of the 90 minute parking limit. Given that 79% of Hayling Island residents currently drive to work, it is considered that many Lidl staff will drive close to the site and park on local residential streets. The Travel Plan should detail how this will be discouraged to maintain good relations with local residents.
- HCC no longer funds hantscarshare.com therefore, an alternative approach should be promoted
- Promotion of local bus operator apps should be included
- Sustainable travel options could be promoted through recruitment
- A bike to work scheme could be established to enable staff to purchase a bike at a reduced price
- Interest free season ticket loans for bus travel could be offered
- The action plan should set out the type of events that will be undertaken. If it is not possible to do this at this stage, details should be updated following the first survey, and sent to HCC.

Roles and Responsibilities

The Travel Plan Coordinator (TPC) role is outlined in the Travel Plan and it is identified that the role of TPC will be undertaken by Arcadis. Contact details for the TPC should be provided to HCC as soon as they are available. The TPC should be in place three months before first occupation.

Monitoring

The sample travel survey included as an appendix should include a question to see if staff are aware of the travel plan.

It is identified within the implementation plan that following staff travel surveys being undertaken, results will be reported back to Hampshire County Council. Whilst this principle is approved, further details are required on the nature of this report.

Funding and Section 106 Agreement

Hampshire County Council will secure the Travel Plan for the proposed development through a Section 106 Agreement, no reference is made to this throughout the report. The report should be amended in order to reflect this.

The Travel Plan states that sufficient resources will be provided to implement the Travel Plan, however, no details of are provided. Further details of the budget and resources available for the Travel Plan are required in order to set the travel plan bond within the Section 106 Agreement.

Conclusion

The Travel Plan 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 Travel Plan before it can be considered acceptable for submission in conjunction with the proposed commercial / employment site.

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

Recommendation

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

- Traffic data
- Trip rates
- Forecast traffic growth
- Trip distribution
- Site access arrangements
- Road safety audit report
- Review of the level of impact in terms of additional traffic generated on the A3023 to 2036
- Confirmation of traffic flows applied to junction models
- Provision of the junction models
- Accident analysis in the vicinity of the site
- Review of sustainable access arrangements and appropriate mitigation measures for journeys by bus, pedal cycle and on foot
- Proposals to cater for school drop of facilities
- A revised 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 Policy 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 is 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.
- In the opinion of the Planning Authority the proposal involves development that cannot be reconciled with the National Planning Policy Framework in that there is insufficient provision of, or support for, sustainable transport options. This would result in a greater number of trips by private car which will create a severe impact on the local transport network and environment contrary to the NPPF and policy DM11 and DM12 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



Stuart Morton
Team Leader

CC Peter Marshall, Development Engineer, Havant Borough Council