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Date

9<sup>th</sup> February 2016

My reference

HD 6/3/13/165 (6546)

Your reference

APP/14/01225

Email

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## For the attention of Steve Weaver

Dear Sir / Madam,

**Outline application with all matters reserved for demolition of existing buildings and redevelopment of site to erect 130No. apartments and 1126sqm of ground floor commercial/retail space (Use Classes A1-A5 and B1(a)) and associated service, access and 58 private residential basement parking spaces (indicative height of building between five and thirteen stories).**

Additional information has been received on the 21<sup>st</sup> December 2015 and the 20<sup>th</sup> January 2016 to address the matters raised in my original response of the 4<sup>th</sup> November 2015. The additional information addresses matters relating to:

- Access
- Sustainable modes of access
- Trip Generation
- Junction Assessments
- Travel Plan

## Access

It is noted that access is a reserved matter and is not being considered as part of this application. At this stage details of the form, location and design of the junction will be required. We are unable to comment on whether any indicative locations included in drawing 14-006/004 would be acceptable at this stage as it is likely that in order to achieve an access to the site existing Traffic Regulation Orders (TRO) will need to be revoked. The removal of this TRO will result in the loss of existing on street parking.

Appropriate conditions will need to be provided regarding the access and

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

requirements for a TRO.

### **Sustainable Modes of Access**

The transport assessment relies on sustainable transport provision to reduce reliance on the private car for access the proposals. The town centre provides proximity to a good range of facilities, including public transport access. However there are a number of identified improvements toward which the development should positively contribute to support the access strategy for the site.

Hampshire County Council's Transport Statement for the Havant area includes a schedule of improvements. This includes cycling improvements to the route between the Railway Station and Havant College, including upgrading the existing controlled crossings and footway widening. The route to Havant College would be via Havant footbridge, the northern side of Elmleigh Road crossing via an upgrade to the controlled crossing on B2149 Petersfield Road and onwards along New Road to Barncroft Way and the College entrance. This would involve some footway widening on Elmleigh Road, New Road and Barncroft Way, associate signage and upgrading of the existing controlled crossing on Petersfield Road to a Toucan. Due to the location of the proposed development this link to Havant College is of direct relevance to the site. It provides not only a link to the college but to the civic centre, leisure centre and surrounding residential estates. The proposed development will increase the demand on this link and therefore it is considered that improvements should be agreed to strengthen the sustainable access to the site.

The Highway Authority has not been able to agree a contribution figure with the applicant toward sustainable transport improvements. It is understood from Havant Borough Council that viability for the development is being analysed by a third party. On completion of this review negotiations regarding a contribution can be completed. It should be noted that consideration should be given to providing the Highway Authority with funding from CIL to put towards these improvements if there is a shortfall in the funding.

### **Trip Generation**

The Highway Authority has raised concerns regarding the proposed residential trip rates. The assessment includes sites within the TRICS database with low levels of car parking which in turn generates a lower trip rate. The applicant has provided (via email dated 20<sup>th</sup> January) sensitivity testing of the trip rate and in order to ensure a robust assessment these rates should be used in any additional modelling required. This higher trip rate therefore accounts for additional traffic generated from by visitors and residents in the nearby public car parks.

There is also the potential for additional parking to occur from the open consent for the retail/B1 element of the development. B1 trip rates are likely to be higher than the existing retail uses and there is the potential for additional trip generation. Information regarding this has been provided on your email of the 20<sup>th</sup> January and show that additional traffic could be

generated from this use. The additional trips calculated by this assessment have been included in further assessment of the highway network.

### **On Street Parking**

It is noted that the surrounding residential area is subject to parking restrictions and therefore on street parking in the immediate area is not considered to be a concern at this stage. However further afield at Grove Road, Juniper Square, South Street, Centenary Gardens and West Street parking is unrestricted and the use of this area will need to be monitored as part of the travel plan and additional restrictions/measures included if a problem arises upon occupation. In addition an obligation should be in place to make funds available for a period of 5 years from completion of the development for any amendments to the existing TRO's on the surrounding highway network if overspill parking does materialise. This would be in addition to any TRO's required to provide the site access and associated visibility splays.

### **Junction Assessments**

An updated forecast increase for all junctions has now been provided. This demonstrates that the North Street/Market Parade sees an increase in traffic flows of 9.3% in the AM peak and 9.6% in the PM peak. The applicant has demonstrated through more detailed modelling that the development does not have a detrimental impact on the operation of the junction with a forecast maximum RFC of 0.273 on North Street in the PM peak in 2020.

The B2149 is a strategic corridor within Havant and has been subject to traffic growth due to development in the surrounding area. The provision of additional housing and vehicular movements will inevitably impact on this already well trafficked route. The assessment carried out by the applicant demonstrates this to be 1% increase in the AM peak and 0.9% in the PM peak. This increase is not considered to represent a severe impact as set out in the NPPF, although it is recognised that the B2149 is a busy town centre route and that an incremental increase in traffic should be noted by the planning authority when determining this application.

### **Travel Plan**

The Framework Travel Plan 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." There are a number of areas that need attention if this Framework Travel Plan is to be approved for the proposed new residential units.

#### **Background**

The Framework Travel Plan makes reference to the purpose of this travel plan but not to relevant documents, strategies and plans both nationally and locally. Nor does it mention the developer's own company ethos towards travel planning. These items should be included along with the company name of

the developer. It would be preferential to make reference to local planning policy documents for Hampshire County Council and Havant Borough Council.

### Consultation and Partnership

The Framework Travel Plan shows commitment to consult with residents, local authorities and public transport operators. The document should also demonstrate a commitment towards working with local businesses and schools who are developing or implementing travel plans.

### Site Audit

The plan provides outline information on car parking provision only. Greater detail on site layout and use will be required to determine if the proposals are appropriate. For example, how many car parking spaces will be provided? Will the developer include any electric vehicle charging infrastructure? What type of cycle storage will be included? Will visitor cycle parking be provided and how?

The document makes reference to meeting the car parking standards and states that it will not provide the maximum number of spaces in order to support aims of reducing car use. Havant's Parking and Traffic Team still have a number concerns regarding the proposed numbers, allocation of the spaces, management of deliveries and overspill parking. There is also potential for additional parking to occur by both by visitors and residents in the nearby public car parks, as stated within the TA. The surrounding residential area is subject to parking restrictions and therefore on street parking in the immediate area is not considered to be a concern at this stage. However further afield at Grove Road, Juniper Square, South Street, Centenary Gardens and West Street parking is unrestricted; the travel plan should provide details of how it will monitor use of this parking and commit to deliver additional restrictions/measures if a problem arises upon occupation.

The document makes reference to meeting adopted car parking standards but not cycle parking standards. A commitment to meeting cycle parking standards should also be included.

Infrastructure and public transport services surrounding the site are very good and highly conducive to achieving a higher percentage of walking, cycling and public transport use by residents.

The document proposes that funds will be provided for town centre walking and cycling improvements. More detail should be provided on how this would operate.

### Targets

Modal split data is provided based on 2011 Census data for the St. Faith's ward. This source is appropriate for the Framework Travel Plan.

However, only headings for targets are given with the exception of a 10% reduction in car use mentioned later within the document. Target data should be presented more clearly and give more detail with a percentage difference for each mode (where relevant) and more detail on other targets. Targets should be SMART in accordance with HCC guidance.

It is understood that these targets may need to be updated and amended following baseline surveys.

The document states that targets will be set once initial travel surveys have been carried out at the 65<sup>th</sup> occupation (i.e. 50% of total occupation) to *allow residents to start to form travel patterns*. This proposal is not supported. Targets should be set prior to first occupation. Baseline data could also be collected earlier in order to measure the impact of the travel plan measures on residents' travel patterns. As stated above, targets can be amended in agreement with HCC following initial surveys. If targets are not set until measures have been delivered and travel patterns are established, any measurable changes in patterns could be missed.

### Measures

A relevant action plan has been identified within this Framework Travel Plan. It identifies relevant measures to support the target headings but no costs are provided. Approximate costs should be included for each measure and for the Travel Plan Coordinator role.

Limited details are given on how walking will be promoted. More consideration should be given to this e.g. details of local leisure walking groups or mapped walking routes highlighting short cuts that residents may otherwise not be aware of.

Table 4.1 suggests investigating potential for reduced rate cycle training and discounts with a local cycle retailer. A firmer commitment should be made.

Personalised journey planning is offered as one measure, this is strongly supported.

No details are given on measures to encourage smarter working e.g. broadband facilities, local groups that support social interaction and networking for home-workers. These should be included.

Given the likely reduced need for car ownership on this site, consideration should be given to a car club. Eco driver training sessions could be offered as an alternative to bus and/or cycle incentives for any interested residents.

Reference to 'My Journey' website, and particularly the multi-modal journey planner should be made if these facilities are available at first occupation.

### Roles and responsibilities

The Travel Plan Coordinator (TPC) role is outlined and an appointment *prior to first occupation* is stated. Commitment to establish a travel plan group is demonstrated.

### Monitoring

The Framework Travel Plan states that surveys will commence at 50 % occupation. After completion of the survey, it is expected that the Travel Plan Coordinator will review the agreed targets to ensure that they appropriate, and liaise with Hampshire County Council if adjustments are necessary.

A sample survey is included. The survey looks at a resident's travel patterns on one day. It is suggested that a longer period e.g. one week is used to gain a wider understanding of resident's travel patterns.

Section two does not cover a wide enough range of situations. Residents may not wish to explain that they are currently without employment so this option, and perhaps others e.g. volunteering should be included.

Section four does not cover a wide enough range of situations. Health care appointments, and perhaps others should be included. An "other" box should be added with an opportunity for residents to explain.

Section five asks "what main mode of transport do you use", this should say "did you use" as it relates to journeys in the past. Options for multi modal journeys e.g. walking and train should be given or else "main mode" should be explained.

Section six should ask "what distance *did* you travel?"

Section seven presumes that the resident travels to work. The survey should state that this section can be skipped if irrelevant.

Section nine should have a bold heading to make it clear that its completion is not reliant on sections seven and eight.

Section ten should only be included if a car club is relevant. Questions could be asked about frequency of use and experience of the car club if relevant.

Section twelve should make involvement in travel planning sound more engaging in order to recruit residents to a steering group.

As stated above, details should be given on how overspill parking in local unrestricted areas will be monitored.

Whilst a sample survey is included, there is no commitment to reach Hampshire's recommended 35% response rate and no mention of measures to encourage residents to participate in order to achieve this rate. These details should be added.

The timetable for surveys is acceptable. A commitment should be made to review surveys against improved targets as outlined above.

### Funding and Section 106 Agreement

The Framework Travel Plan makes reference to the Section 106 Legal Agreement but does not provide sufficient detail on remedial measures should targets fail to be met. The funding requirement for travel plan approval and monitoring by HCC should also be reflected in the document along with the bond requirements.

### Conclusion

The Framework 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 Framework Travel Plan before it can be considered acceptable for submission in conjunction with the proposed residential site.

### **Personal Injury Accidents**

The personal injury accident data has been reviewed further. The accidents involving vulnerable road users do not form any specific accident pattern at a given location that would benefit from specific remedial measures. However the contribution towards sustainable travel would aid in reducing on road cycling by providing a route via quieter residential streets and off road facilities to the north which in turn would aid in reducing the potential for conflict with motorised users.

### **Recommendation**

If the Planning Authority is minded to approve the application I request that it be subject to conditions, and a legal agreement to secure the following:

#### Obligations

1. Provision of a Sustainable Transport Contribution
2. Commitment to provide funding on request for a Traffic Regulation Order to manage any overspill parking
3. Progression of a Traffic Regulation Order to remove existing on street parking to accommodate the site access and associated visibility splays.
4. Provision of a Full Travel plan with monitoring fees, approval fees and bond.

#### Conditions

1. No development hereby permitted shall commence until the plans and particulars showing the means of access, including the layout, construction and sight lines for the development has been submitted to and approved by the Local Planning Authority and the Highway Authority in writing.

Reason: In the interest of Highway Safety

2. The development hereby approved shall not commence until the access and any proposed crossing of the highway verge and footway shall be laid out and constructed and maintained in accordance with the details approved by the Local Planning Authority and the Highway Authority.

Reason: In the interest of Highway Safety

3. No development hereby permitted shall commence until a Construction Traffic Management Plan, to include details of provision to be made on site for contractor's parking, construction traffic access, the turning of delivery vehicles and lorry routeing as well as provisions for removing mud from vehicles and a programme of works has been submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented before the development hereby permitted is commenced and retained throughout the duration of construction

Reason: In the interest of Highway Safety

In the event that the application is refused then the following reasons for refusal apply due to the absence of appropriate conditions and a S106 Agreement to secure the required obligations.

- In the opinion of the Planning Authority the proposal involves development that cannot be reconciled with the National Planning Policy Framework in the absence of any commitment to support sustainable travel options, and in the absence of binding travel plan arrangements. 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



Ben Clifton  
Team Leader- Highways Development Planning.

CC Peter Marshall, Development Engineer, Havant Borough Council