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Enquiries To Jonny Elliott

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Date 26 February 2024

My reference 052077

Your reference APP/23/00996

Email havantdc@hants.gov.uk

Dear Lesley,

McCormack House, 56A East Street, Havant, PO9 1BS

Change of use from office use (Class E) to education use (Class F1) and associated external alterations to the building and its curtilage, including provision of a multi-use games area (MUGA) and new fencing.

I refer to your consultation for the above planning application and would offer the following comments.

Development Proposals and Site Access

The application is for a change of use from an office to an educational use for up to 70 pupils with complex needs. It is anticipated to have 30 full-time staff and 10 part-time staff. The opening hours would be 0830 – 1630 hrs. Monday to Friday.

The application site is located to the south of East Street, at the edge of Havant Town Centre. In the vicinity of the site, East Street is subject to a 30mph speed limit. The carriageway width allows two-way traffic flow and includes a Traffic Regulation Order in the form of double yellow lines and advisory on carriageway cycle lanes. The road is lit, and footways are present to both sides of the carriageway. A bus stop and layby are located directly opposite the site access. National Cycle Route 2 runs through the access and car park to the east of the building.

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A Public Right of Way Public Footpath 108 travels along the southern site boundary. It is noted that the HCC Countryside Planning Team have made comment on this aspect of the proposals.

Access to the site is gained via East Street from a simple bellmouth priority junction. This is a shared access which also provides access to The Spring building and the Town End House pay and display public car park. There are no concerns with the junction visibility splays from access onto the highway. The proposals do not include any changes to the access, and there are no objections with the use of the access in relation to the proposed development in principle.

Proposed Internal Layout

The proposed internal layout includes 42 parking spaces. Referring to the Havant Borough Council Parking SPD, educational establishments require a minimum of 1 space per teacher plus 2 spaces per 3 non-teaching members of staff. Based on the information provided within the Transport Statement, the split between teaching and non-teaching staff is unknown. However, it is anticipated that teachers would make up at least 50% of the total members of staff. On this basis, the proposed development would require between 34 and 40 parking spaces. On this basis, the provision of 42 spaces is likely to accord with the local parking standards SPD.

There are no objections to the retention of the 6 existing cycle parking spaces. However, 'Sheffield cycle stand' spaces are inappropriate for long-term staff use and it is unclear if the proposed layout includes covered, secure parking provision for staff.

There are no concerns with the proposed servicing arrangements, and the submitted swept path analysis plans demonstrate that the layout allows service vehicles, delivery vehicles, fire and refuse vehicles to enter, turn and exit the site in a forward gear.

Pupil pick-ups and drop offs are proposed to take place within the site with two spaces in front of the building being allocated as a pupil drop off/pick up area. The TS states that members of staff will manage traffic within the site in order to minimise disruption and queuing back onto the highway. A vehicle swept path analysis plan has been provided which shows a car entering the site, dropping off, then reversing out of the space before exiting the site.

Given the location of the site, pupil drop-offs / pick ups on the highway would not be appropriate, therefore, allowing drop offs to take place within the site is necessary however the proposed drop off / pick up strategy is not accepted. It is unlikely that two spaces are sufficient given the anticipated number of drop offs /pick up that are likely to

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occur. The time that vehicles arrive / depart cannot be controlled. The drop off / pick up area is very close to the access, and any more than one car arriving in a short period of time will result in congestion in close proximity to the access. This will lead to vehicles queueing back onto the highway, or queueing on the highway whilst waiting to enter the site. Regular vehicle reversing movements in this area may lead to conflicts with vehicles on the access road travelling around the corner towards the exit. It is unclear how parents will be made aware of the drop off strategy or if parking management strategy has been written. It is not clear how the staff/marshals will differentiate between parents and members of the public wishing to use the pay and display car park. In any event, staff would not have any authority to marshall/control members of the public who are using the public pay and display car park.

Overall, the proposed the pupil pick up / drop off arrangements are considered to be unacceptable in this location in such close proximity to the shared site access and will result in congestion near the access and onto the highway, to the detriment of highway safety.

Traffic Impact

the submitted Transport Statement includes details of the proposed development traffic impact. The TRICS database has been utilised to calculate the existing office trip rates. This predicts that the office could generate up to 50 two-way movements in the peak hour. Our own TRICS assessment for sites in a similar location to the application site suggests the trip rates provided in the TS are likely to be an overestimation, and the proposed office is likely to generate between 29 – 32 trips during the typical weekday AM/PM peak hours.

The proposed development trip generation which is provided in the TS is considered to likely development likely underestimate traffic generation as it assumes that 90% of pupils would be a shared trip whilst 10% would use public transport. The assessment has been re-undertaken by the Highway Authority using more robust assumptions with a lower level of shared trips. This suggests that the proposed development would generate around 87 peak hour trips.

A comparison of the developments suggests that the proposals would generate an additional 55 trips during the weekday AM peak hour. The proposed development is predicted to generate 23 fewer trips during the weekday PM peak hour, however, there would be an increase in trips during the school peak hour of 1600 – 1700 hrs.

When taking into consideration existing congestion in the area, such as on the A27 corridor and Park Road to the west, a material increase in traffic on the local highway

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network would not be acceptable and appropriate mitigation is required in order to ensure that active travel and sustainable travel choices are maximised, thereby reducing the proposed level of traffic generation as much reasonably as possible.

Site Accessibility and Travel Plan

The Application Site is located to the east of Havant town centre, within walking and cycling distance of bus stops, Havant railway station and the town centre. There are a number of public footpaths in the vicinity of the site, however, it is noted that the HCC Countryside Planning team have provided comments on this aspect of the proposals and as such, we would not have anything further to add.

The proposals do not include any accessibility improvements. However, improvements towards enhancing the accessibility of the site by non-car and active travel modes are considered to be necessary to ensure that the accessibility of the development is maximised, thereby reducing the development traffic generation as much as possible.

This 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".

Section 1

Title page

This section should contain the following:

- Type of travel plan (Framework / Full)

Introduction

This section should contain the following:

- Site masterplan
- History of site:
 - Previous planning applications
- Expected school start and finish times
- Whether the school is likely to be used for extended school activities (breakfast club, extra-curricular), or for any community activities
- Whether there be a staggered intake state intake numbers of pupils each year from opening
- Known applications in the vicinity, likely to impact this proposal
- Developer's view on travel planning / statement from the developer supporting the contents of the travel plan

Section 2

This section should contain the following:

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Guidance

The travel plan should include a list and description of the national and local policy documents that are relevant to the site. These may include, but are not limited to:

National

- Planning Practice Guidance 'Travel Plans, Transport Assessments and Statements' (2014)
- CIHT's 'Guidelines Planning for Walking' (2015)
- CIHT's 'Buses in Urban Developments' (2018)
- DfT's Manual for Streets (2007)
- LTN 1/20 Cycle infrastructure design
- Childhood obesity: a plan for action (2016)

Regional

- Hampshire Healthy Weights Strategy (2022-2026)

Local (where applicable)

- LPA Parking SPD
- LPA Clean Air Policy
- LPA Local Plan
- LPA Electric Vehicle SPD
- Neighbourhood Plans

Section 3

This section should contain the following:

Site Audit Existing

- Site boundary
- Plan
- Footways and cycleways, including:
 - Walking Isochrone Map
 - Cycling Isochrone Map
 - Local Facilities
- Nearest (or relevant) train stations, including:
 - Timetable – This information should be presented in a table.

Section 4

This section should contain the following:

Site Audit Proposal

- Details of the drop-off area, including:
 - The number of vehicles the area can facilitate
 - How drop off and pick up will be managed
 - The number of minibuses/taxis expected
 - How management of this area will reduce the impact on the local network
- Car parking, including:

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- LPA/LHA SPD guidelines (including electric vehicles) - The travel plan should include the table outlining the requirements for educational establishments.
- Quantum – A breakdown of the total car parking spaces by the types outlined in the Havant Parking SPD.
- Type – See above.

For special schools, we require the number of vehicles used by the school which will also be assessed as part of the parking provisions. Other details that should be included are vehicle type, size, how many pupils use them and arrangements for drop-off/pick-up.

- Cycling parking, including:
 - LPA/SPD guidelines
 - Location
 - Type
- Internal highway design, including:
 - Roads
 - Footways
 - Cycleways
 - Guidelines used to inform them
- Site opening and closing hours (not teaching/school hours)
- Visitor / delivery movements (where applicable), including:
 - Associated parking arrangements for both cycle and vehicles

Section 5

This section should contain the following:

Aims and Objectives

- Commitment for the Aims and Objectives to be published to the school community and it needs to be clear how this will be done in documents such as:
 - School Prospectus
 - Staff Travel Information Pack
 - On the school's Intranet
 - Added to noticeboards / Newsletters etc

Targets

- Baseline mode-share using valid and site-specific data, sources may include:
 - TRICS
 - Census 2011 – MSOA level (outdated and high-level data will not be accepted)
- A minimum 10% reduction in SOV, including:
 - A breakdown of each mode-share biennially
 - A justification for why mode-share will increase / decrease

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Section 6

This section should contain the following:

Measures

There are some additional measures which should be considered for inclusion within this FTP. Some of these measures may be applicable only to residents or employees, or to both groups

Walking

- Showers, changing facilities and lockers for storing clothes (for staff)
- On site security

Cycling

- Secure, well lit, covered cycle storage with pumps inc. CCTV for cycle security
- Assistance to staff in accessing information about safe cycling, appropriate clothing, local cycle routes etc.
- Bike services stations (staff and visitors)

Public Transport

- Collaboration with local public transport providers to improve services, negotiate discounts and trial initiatives

Marketing and Promotion

- Travel Plan included in the School Improvement/Development Plan
- Promote sustainable travel events and schemes
- Feedback sessions
- Advertising TP to staff through recruitment, e.g. how to get there for interview and on the website
- Commitment for the school to find opportunities in the curriculum to teach the benefits of sustainable travel

Consultation and Partnerships

At the Framework Travel Plan stage, the document should contain evidence of:

- Preliminary liaisons with local cycle shops and public transport operators to scope the possibility of arranging for discounts on equipment and services respectively

These communications can then form the basis for further negotiations between these companies and the Travel Plan Coordinator (TPC) at/after the Full Travel Plan stage.

Section 7

This section should contain the following:

Delivery and Enforcement

The needs to be a section relevant to enforcement should include the following detail:

- Paragraph explaining the role of the Section 106 agreement including the value of the Travel Plan Cash Deposit (where applicable)
- Commitment to pay HCC's [monitoring and approval](#) fees

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- Commitment to provide a Travel Plan Cash Deposit of equal value to travel plan measures
- Sanctions in the event of non-compliance

Management / TPC role

Framework Travel Plan

- The breakdown of the estimated figures for the:
 - Time spent on travel plan per week
 - Number of weeks per year to be working on the travel plan
 - Cost per hour
 - Overall cost
- Creation of a working group upon opening to support the school's travel plan co-ordinator

This section should contain the following:

Monitoring

- Monitoring timetable as laid out below:

	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

- Snapshot surveys to be conducted for years where a full survey will not be carried out.
- Alternative method of survey if 35% response rate not achieved, e.g., ATCs/TRICS.
- Keep records of participation in sustainable travel scheme and incentives.
- We also expect at least one of the groups below to be surveyed:
 - Drivers and Escorts
 - Local Residents
 - Local Business and Organisations
- The list of stakeholders involved who will be responsible for reviewing the travel plan and monitoring i.e. governors, the school's Senior Management Team etc.
- Commitment that the school will to consider the ongoing travel needs of pupils following any developments in education and transport provision and to revise the travel plan as necessary

Section 8

This section does not require any further amendments.

Appendices

Appendix B –

This section should contain the following:

Action plan

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- The action plan as laid out below (see guidance):

Objective	Measure	Start Date	Due Date	Responsibility	Mode affected	Cost Estimate	How to measure success

Table 4 - Example Action Plan

Yours sincerely,

- The measures on listed by and labelled with their priority (High, Medium and Low)

At the Framework Travel Plan stage, the actino plan should include all of the measures outlined in Section 6.

The items on the action plan should be accompanied by the estimate cost, which will be revised at the Full Travel Plan stage.

This travel plan requires the areas outlined above to be addressed before it can be considered approved for submission.

If you have any questions, please do not hesitate to contact Simon St John by email at dptravelplans@hants.gov.uk.

Personal Injury Accident Assessment

A review of the personal injury accident data in the vicinity of the site does not suggest that a cluster of accidents or existing highway safety issues in the immediate vicinity of the site. However, the proposed pupil pick up / drop off strategy is likely to result in a highway safety issue. It should also be noted that HCC do not typically accept Crashmap data as it is usually out of date and lacking in detail, and in the future accident data should be obtained from Hampshire Constabulary.

Recommendation

Overall, the proposed internal layout and pupil drop off / pick up location and strategy is likely to result in congestion within and adjacent to the highway, to the detriment of highway safety and efficiency and contrary to local and national policies which relate to highway safety. The likely increase in traffic generation and lack of mitigation strategy or contribution toward active travel and/or sustainable travel measures is contrary to local and national policies which seek to reduce reliance on the car.

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The Highway Authority recommends a holding objection until further information has been provided which addresses the issues raised in this response. Should you wish to determine this application prior to these points being addressed, please contact the Highway Authority for suggested reasons for refusal.

Yours Sincerely

Gemma McCart
Transport Team Leader
Hampshire 2050

Director of Hampshire 2050
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