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<i>Date</i>	6 th September 2022	<i>Email</i>	Chris.hirst@hants.gov.uk

For attention of

Dear Sir,

Re: Outline application for development of up to 300 dwellings (including affordable housing). The proposals includes a provision for structural planting and landscaping; informal public open space; children's play areas; sustainable drainage systems (SuDS); a new vehicular access from St Mary's Road; and associated ancillary works. All matters reserved except for means of vehicular access. Accompanied by an Environmental Statement. | Rook Farm, land off St Mary's Road, Hayling Island

Thank you for your reconsultation on the above outline planning application. Further to the Highway Authority's planning response dated 27th April 2022, the applicant has submitted a Seasonal Traffic Assessment (STA) to address the comments raised by the Inspectors during the Local Plan EiP who requested a seasonal assessment to understand whether the local road network can accommodate the traffic flow during this time.

The Highway Authority have reviewed the STA and wish to make the following comments.

Assessment Background

The STA has been submitted by the applicant to address the impact of the proposed development at Rook Farm for 300 dwellings on the local road network during the summertime period. The response previously provided by the Highway Authority on 27th April reviewed the information presented within the Transport Assessment (TA) and requested a summertime impact assessment inline with the requirements identified through the Local Plan EiP.

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

Whilst the STA has been submitted in support of this specific planning application, Havant Borough Council have commissioned traffic surveys in August to carry out their own summertime period assessment. The Highway Authority acknowledge that this report has been produced by the applicant for the purposes of progressing the current live planning application. It is important to note that the outputs of the Paramics model used to assess the impact of the emerging housing allocation on Hayling Island remain appropriate for the purposes of the Local Plan assessment, alongside the identified mitigation opportunities for the traditional peak times. The methodology taken towards assessing the summertime peak period on behalf of Havant Borough Council is outlined in Campbell Reith's technical note dated December 2021. This is not yet agreed with the Highway Authority.

Paragraph 2.2.3 of the STA questions the methodology being applied by Havant's consultants in assessing the summertime impact by taking the average of the last two Wednesdays in August, along with the August bank holiday weekend. Upon receipt of the 2022 summer time survey data, the Highway Authority will consider and engage with the applicant on the most appropriate dataset to utilise .

Rook Farm Seasonal Methodology

The STA considers two hypotheses with regards to the impact on traffic flows during the summertime period:

1. The tourist traffic peak will occur during the inter peak period, with most of the activity occurring after the AM peak hour when those visiting the island arrive. Tourists are then said to depart before or after the PM peak hour in a bid to avoid traffic.
2. Tourist traffic will contravene the general direction of traffic flow. For example, tourists will be travelling southbound onto the island in the morning when commuters are looking to travel north off the island. In the afternoon, tourists are said to be leaving when commuters are returning to the island.

The Highway Authority disagrees with some of the assumptions made within these hypotheses. Through it's own separate assessment work, the Highway Authority has identified that the PM peak hour falls at a time when there is both commuting and tourist traffic on the local road network – that time frame being 16:30 – 17:30 during the summer period, with this impact being greater on a Friday PM period. Therefore, it is not appropriate to assume that the two sets of travellers are mutually exclusive; in reality, there is likely to be a mixing of the two as commuters return to the island whilst tourists, who have stayed on the island or have spent the day visiting, choose to leave.

Whilst it's acknowledged that, as per hypothesis 2, these trip patterns may be in different directions during the peak periods, this becomes less relevant when looking at particular junction impacts as flow along the A3023 generally will impact on opportunities to make manoeuvres at the various junctions along the route.

Data Sources

The applicant has purchased traffic flow data from HCC's Traffic Surveys team to consider the variations in traffic flow during the summertime period. Whilst this data covers movements on and off the island itself, it does not take into account all of the movements within the Langstone area given its location just to the north of the bridge. This area and the associated traffic movements have therefore been omitted from the assessment.

The Highway Authority have requested a standalone modelling assessment of the A27/Langstone Road Roundabout within its response dated 27th April to understand how the junction will operate with the inclusion of development related trips. The August survey data collected by HBC will provide the traffic data needed for this modelling work and in the absence of such data, the assessment work submitted to date is insufficient.

A mixture of 2017 and 2019 has been utilised within the assessment to tally with the baseline assessment year of the Paramics model and to provide the most recent traffic data unaffected by the Covid-19 pandemic. The data has been assessed across weeks in June, July and August to again match the Paramics baseline data, accord with the recorded warmer weather and align with the August bank holiday. TRICS data has been used to forecast the traffic generation associated with the Rook Farm development and wider emerging housing allocation.

Seasonal Assessment

Table 3.1 presents the variation in weekday peak hours across each month in 2017 and 2019. Based on the tabulated data, the PM peak hour was shown consistently to be 16:00 across both years (which differs from the Highway Authority's assessment above). There was greater fluctuation in the AM peak hour, varying between 07:34 and 11:00. HCC have also undertaken an analysis of traffic flow from the permanent counter at Langstone Bridge to establish the peak hours at certain times of the year. This analysis has indicated that the AM peak hours are between 10:00 – 12:00 during the summertime peak, and this can vary with a peak hour within this period. Therefore, it cannot be agreed that it would be 11:00 -12:00 on any assessment day and the AM peak hour will need to be determined once the 2022 data is available.

The level of variation across the months has been considered against the Institute of Environmental Management and Assessment (IEMA) which considers that traffic flow variance has to be higher than 10% to be considered to cause a greater than negligible impact in especially sensitive areas. The guidance also states that the variation has to be greater than 30% to be considered to cause a greater than negligible impact in non-sensitive areas.

The Highway Authority does not agree that it is relevant nor acceptable to consider the traffic variation against this guidance. The IEMA is not for application within Transport Assessment work given that it works to different assumptions and criteria on what is defined as significant in highway terms.

The purpose of the Inspector's request for summertime modelling was to identify if there would be a severe impact on the local road network during this timeframe with the addition of development traffic. It is therefore imperative that the correct definition of severe is applied to understand whether the seasonal traffic fluctuations meet these criteria. This is to be set on a case-by-case basis informed by the right data and assessment work. A blanket application of EIA assessment criteria is not appropriate.

The A3023 corridor provides one route on and off Hayling Island. It is therefore the most traffic sensitive road in the county when road works are required and is more sensitive to minor increases in traffic demand. An appropriate methodology must therefore be applied in considering traffic flow increases over the summertime period to ascertain whether the increase is considered severe or not. This methodology should include the utilisation of the existing Paramics modelling and additional junction specific modelling as requested within the Highway Authority's response dated the 27th April 2022.

It is apparent that the modelling work to be undertaken by Havant Borough Council to support the new Local Plan is still to be agreed and set out by the Borough Council. It is clear from the note sent on the 19th August 2022 that the assessment considerations have changed since the previous response. Therefore, it is becoming more likely that additional runs of the existing Paramics model may be required by the applicant to reconcile the non-summer and summer time impacts on the corridor as a whole and the delay caused as a result of additional development. The Highway Authority request further discussion on this point with the applicant once the summer time data is available and has been considered.

Flow Profile Variation:

The hourly flow data across June, July and August has been plotted against the TRICS rate utilised within the Paramics model to understand if there are any variations between the identified peak hours.

Paragraph 3.2.10 concludes that the Paramics and Rook Farm assessment have assessed a reasonable weekday peak hour given that the traffic survey data in June aligned with the TRICS data in the AM peak hour whilst the PM peak data according to TRICS (17:00-18:00) was only 0.4% lower than the traffic survey PM peak data between 16:00 – 17:00. Outside of the peak hours, the survey data varies from the TRICS data in that the former increases and generally remains steady during the interpeak period before the flows increase again during the PM peak period, whereas the TRICS data shows a notable decrease following the AM peak period and a lower percentage of overall trips during the interpeak.

Whilst it is agreed that the TRICS data appears to tally with the traffic survey data in terms of identifying when the local network peak hours fall, the Inspectors were specific in their request for a worst-case summertime peak assessment to ascertain the impact on the network at this time. This can only be carried out by utilising the latest traffic survey data to identify the peak hours before development traffic flows from the emerging allocations are then

applied. Havant undertook traffic surveys of a number of occupied sites in July 2018 which could be utilised to validate the TRICs assumptions that trip rates fall considerably on the island from development in the interpeak periods. The applicant should undertake an exercise to validate its assumptions against this surveyed data.

Local Plan Traffic Impact:

To further compare with the flow profile variation, the STA also looks at the local plan related vehicular trips. A total of 1,069 dwellings have been assessed, including committed development, which is noted and considered acceptable. The trip generation associated with these new dwellings has been forecast by utilising the trip rates used within the previous local plan work underpinning the Paramics model.

Applying the above methodology, a total of 337 and 356 trips are forecast in the respective traditional AM and PM peak hours through committed and proposed development on the island. These flows have been applied to the baseline traffic survey data which have subsequently been split into northbound/southbound flows and averaged per hour to understand the flow variation following development. As per the above, this approach hasn't been considered against the bespoke flow profile on Hayling Island and therefore the Highway Authority are not able to agree to this methodology of assessment.

Section 3.2.16 of the STA goes on to consider this to be a particularly robust approach as no seasonal adjustment has been provided to the trips, nor has the assessment factored in any home working associated with the Covid-19 pandemic. The Highway Authority disagrees that it would be appropriate to apply a reduction to the trips based on a home working scenario as it is currently unclear how future working patterns will alter and whether the Covid-19 work from home scenario will remain across different job roles. It is therefore premature to assume any longer term trip reduction scenarios.

Section 3.2.18 of the STA summarises that the neutral June flows are higher than July and August flows in the AM peak hour. The Highway Authority do not agree that this is a consistent trend when looking at other years data. The Highway Authority's own observations of the data suggest that the last two weeks of July may be the highest for traffic flows. What can be concluded is that there is variation on demand during any given week year on year across the summertime period, although generally across the week they are all consistently higher. The Highway Authority's review work has identified that there are clear variations in traffic levels between the summer and non-summer period, typically between an additional 3,000 and 5,000 vehicles a day depending on the day of the week. The forecast development related trips could load a further 10% of vehicular traffic onto the network, exacerbating the extant queuing. Until Havant Borough Council have been able to commission their own traffic surveys and undertake further assessment work to identify the busiest time during the summertime period within 2022, it is not possible to forecast how this will impact the network.

Modelling

The note concludes that no further modelling work is required along the corridor as the profile of the data means that the current June assessment considers the summertime peak period.

This is not agreed and would not be considered appropriate assessment to meet the needs of the Inspector's decision. Whilst the Highway Authority acknowledge that it is not for an individual applicant to undertake the work of the Borough Council in fully assessing the Local Plan impact, it must sufficiently assess the impact of its own development and other committed schemes to satisfy the Highway and Planning Authorities that the site will not have unmitigated significant harm or a severe impact on the Highway. The requirement therefore remains for the summertime period to be fully assessed along with individual junction modelling requirements.

Given the note from Havant Borough Council this month of their latest modelling position, the Highway Authority need to reconsider the extent of the modelling requirements for applicants in order to satisfy the planning considerations.

It is likely that this will include additional Paramics work and additional junction assessment work at Northney Road/Langstone Road junction which made up part of the mitigation package for the Local Plan proposals.

Summary

The Highway Authority requires additional information before it can be satisfied that a suitable summertime peak assessment has been undertaken, in line with the Inspector's comments. This additional information is required alongside the points raised in the Highway Authority's response dated 27th April 2022.

The following points need to be addressed:

- Engagement with the Highway Authority on the August 2022 survey data when this information has been released;
- Analysis of the survey data to understand where the peak hours lie during the summertime;
- Analysis of the July 2018 surveys to validate the TRICS data for flow profile across the day; and
- Updated junction modelling and re-run of the Paramics model for the junctions identified within the Highway Authority's response dated 27th April 2022 and the Northney Road/Langstone Road junction with the summertime peak modelling flows.

I trust that the above is clear. Should you have any queries, please do not hesitate to contact Chris Hirst on the number noted above.

Yours Sincerely,

Ben Clifton – Strategic Transport Manager.