

Overview

This document provides our response to the 'Supplementary Transport Assessment', the 'Framework Travel Plan', the 'Framework Operational Management Plan' and various related documents and appendices added on July 9th 2021.

Firstly, we note the updates made to provide a 'low cost' solution to cycle safety issues at the New Lane / Crossland Road junction and the 'corrected traffic distribution' in Table 6.2.

We remain concerned that the 'Occupier Traffic Data', which underpins **all** of the projections in the Transport Statement and is repeated throughout these new documents, remains both **inaccurate and incomplete**. As such, it does not provide a reasonable and appropriate reference from which to predict traffic generation for the proposed operation.

In particular, there is no evidence in the 'Occupier Traffic Data' that staff commuting trips have been included, leading to a shortfall in traffic movements conservatively estimated at **almost 1,900 trips per day**.

We also remain concerned that the description of this proposed development in the 'summary' sections of the documentation **deliberately misleads the casual reviewer by repeatedly stating that this is a local delivery operation**. The reality is that only 5% of the deliveries will be local, 'last mile', with the overwhelming majority, 95%, needing direct access to the A27 or the A3(M).

Fifty years since its heyday, the New Lane employment area is increasingly surrounded by residential property. At its manufacturing height in the 1960s and 1970s, none of the New Lane businesses worked **a traffic intensive, three shift, twenty four hour day with a seven day working week**. If this development is permitted, the immediate residential neighbours in Nutwick Road to the east will endure **HGV reversing alarms every seven minutes overnight from 10:00pm to 6:00am**, while the residents of the surrounding area will suffer **significant site commuting traffic either side of midnight**. While the proposal actively promotes the use of public transport, the reality is that public transport is simply not available to service a midnight shift handover.

Finally, it is extremely worrying to find so many mathematical and transcription errors in these documents. While many appear trivial, there are some which **highlight significant quality issues with the data**. In places, it appears that tables have been creatively assembled to attempt to defend a previously adopted total.

The 'trip generation data' presented is not credible and cannot be considered robust.

Understanding the scope of 'Development Trip Generation' data

At the core of the transport documentation is the 'Development Site Trip Generation' and given concerns raised when we first reviewed the Transport Statement in April, we have now sought guidance on just what should be included in this critical data set.

The Ministry of Housing, Communities and Local Government (MHCLG) [guidance on Travel Plans, Transport Assessments and Transport Statements](#), makes it clear that 'trip generation data' relating to a development should take account of **all** movements, **including inbound and outbound staff vehicle commuting movements**.

We contacted the [TRICS Consortium](#), an authority on Trip Generation Data quoted by the Applicant and part owned by Hampshire County Council, to clarify just what type of 'trips' should be covered in a 'Development Trip Generation' report.

We asked:

"should we just be considering the movements of the staff in the course of their daily employment, outbound from and inbound to the development site, or should we also be counting the inbound and outbound commuting journeys and methods of transport that the staff are using?"

The response from TRICS was unambiguous:

"For all of our surveys, we include every single movement related to a development as a trip, whether it be a commute, a trip out to buy some lunch or any other reason"

The UK Government MHCLG guidance on 'Travel Plans', 'Transport Statements' and 'Transport Assessments' goes further, stating that the trip generation data should also take account of:

"the cumulative impacts of multiple developments within a particular area" with "an assessment of trips from all directly relevant committed development in the area (i.e. development that there is a reasonable degree of certainty will proceed within the next 3 years.)"

This would clearly include Spring Business Park which is the neighbouring development nearing completion in New Lane. Since both of these developments are owned by the same developer, the omission of this detail from the Trip Generation Data is surprising and, we believe, significant.

Other 'relevant committed development' in the area would include the developments on the Colt site in New Lane, particularly the commercial development which will front New Lane, and the continuing residential developments to the north and south of Bartons Road.

Trip Generation Data inaccuracies

We now highlight some of the inaccuracies in the Trip Generation data provided with the Applicant's documents. Please bear with us as we detail some of the more apparently trivial points since, taken cumulatively, they undermine confidence in the quality of the traffic analysis which has been performed for this application.

We turn first to the 'Proposed Site Trip Generation' in the 'Supplementary Transport Assessment'.

Proposed Site Trip Generation

- 5.2 A summary of the trip generation obtained from the occupier for the proposed development, for the AM and the PM network peak period is set out in **Table 5.1**. The trip generation provided by the proposed occupier is contained in **Appendix B** of this report. The proposed site traffic for the site has been presented and agreed with HCC who have confirmed that the data is robust.

Table 5.1: Development Trip Generation

Time Period	Car			LGV (excl. cars)			HGV			Total		
	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total
08:00	12	0	121	0	216	216	1	1	2	122	217	339
17:00	0	105	105	216	0	216	0	0	0	217	112	329
Daily	541	541	1081	505	505	1010	36	36	72	1,208	1,208	2,415

Apart from the obvious typographical error in the 08:00 peak hour 'Car - In' data and the simple error in the final total figure of '2,415', this data contains more worrying anomalies.

Adding together the Daily Totals for arrivals and departures for Cars, LGVs and HGVs, the final totals are '**1,082**' – not the '**1,208**' shown in both cells under 'Total'. Depending on whether or not you ignore the other 'typo' in the 'Car – Daily Total' cell, the daily trip generation therefore adds up to either '**2,163**' or '**2,164**', rather than the '**2,415**' actually presented as the overall total. These obvious discrepancies call into question the integrity of the whole table.

We also note that the data in Table 5.1 shows only **505** van movements per day, which represents just **58%** of the planned capacity of the development.

Base 'Occupier Traffic Data' analysis

Turning now to the reference source for the trip generation detail, 'Appendix B – Proposed Occupier Traffic Data', we find a simple table which is **the single source for traffic data** underpinning **all** of the data presented in the application's documents.

Vehicle Movements Per Hour																									
	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	0	1	2	3	4	5	
Total	206	303	339	96	41	81	45	45	88	43	166	329	252	71	50	60	141	9	8	8	8	8	8	8	
Arriving	89	158	122	1	40	23	23	23	39	10	158	217	94	0	50	12	121	4	4	4	4	4	4	4	
Departing	117	145	217	95	1	58	23	23	50	34	8	112	157	71	0	49	20	5	4	4	4	4	4	4	

The table is described in Section 5.2 of the 'Supplementary Transport Assessment' as "the trip generation provided by the proposed occupier". A previous document¹, states that "Daily arrival / departure patterns have been obtained from the occupier, with these based on traffic for over 100 similar units that they operate across Europe." **It is thus presented as being representative of the operation proposed for New Lane.**

The data is displayed across 24 columns indicating hours of the day, and by three rows, 'Total', 'Arriving' and 'Departing', without breakdown by type of vehicle. This is significant since the staff commuting trips by car at the shift change times should be easily visible in the data and it is missing.

Note that there are no line totals shown in this data, a point which raises slight suspicion. Doing the arithmetic we find that the total number of arrivals is '**1,208**', the total number of Departures is '**1,209**', giving a line total of '**2,417**'. Adding up the individual column totals however, gives an overall total of '**2,413**'. We assume that the '**2,415**' used for Table 5.2 in the 'Supplementary Transport Assessment' was simply selected as the midway point from this rather inconsistent reference base.

Taking a closer look at the reference data in Appendix B however, we are struck by two anomalies:

Vehicle Movements Per Hour																								
	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	0	1	2	3	4	5
Total	206	303	339	96	41	81	45	45	88	43	166	329	252	71	50	60	141	9	8	8	8	8	8	8
Arriving	89	158	122	1	40	23	23	23	39	10	158	217	94	0	50	12	121	4	4	4	4	4	4	4
Departing	117	145	217	95	1	58	23	23	50	34	8	112	157	71	0	49	20	5	4	4	4	4	4	4

12	13	14	15
45	45	88	43
23	23	39	10
23	23	50	34

23	0
9	8
4	4
5	4

¹ Transport Statement, Feb 2021

The first, shown on the left, may just be another trivial example of the poor quality of this transport documentation. The imbedded totals for Arrivals and Departures between the hours of 12:00 and 15:59 simply do not add up. When these simple errors are corrected, we find that the true daily total from this base data should actually be **'2,417'**, not **'2,413'**.

The second anomaly, shown on the right, is far more significant. Between the hours of 23:00 and 00:59, the source data shows a total of only 8 arrivals and 9 departures. From other documentation provided², we can assume these to be HGV movements supplying the warehouse. We know that the delivery vans at this time will be on their storage decks, but we are very surprised not to find details of the car movements expected to support the Evening and Night shift handover at midnight.

Since the period from 23:00 – 01:00 is the period during which the night shift will be arriving and the evening shift will be departing, we would expect to see several hundred staff trip movements in that part of the data. **Looking at the 'Occupier supplied vehicle data', we therefore conclude that staff commuting trips have been excluded.** This is a significant omission given MHCLG guidance and is misrepresentative for any reviewer trying to assess the true impact of the development.

The planning application inexplicably omits any data for employment so we have made justifiable assumptions that at full capacity, the workforce will number 866 delivery van drivers and a minimum of 140 warehouse staff per shift – totalling 420 warehouse staff per day.

The operation at the proposed development site will span three 8 hour shifts³ at the warehouse, with the night shift (midnight til 8:00am) being the most labour intensive⁴. The warehouse staff are provided with parking for 208 cars, 11 motorcycles and 50 cycles. At full capacity, the operation will support 866 delivery vans, whose drivers will arrive and depart under their own means and whose private vehicles will be parked during the day on the van parking decks⁵.

The average of 140 staff per shift is **a conservative estimate** based on each shift using less than 50% of the available staff parking spaces to allow for shift overlap parking.

A reasonable estimate for the number of number of staff working from the site each day would therefore be 1,286, representing **2,572** staff commuting 'trips' generated per day. Since we can see from the 'Framework Travel Plan' that the Applicant expects that **73%**⁶ of staff commuting trips will be by car, we can assume that the total number of staff commuting trips **by car** per day will be at least **1,877**.

² Framework Operational Management Plan

³ Framework Travel Plan Section 4.6

⁴ Framework Car Park Management Plan

⁵ Framework Travel Plan Section 4.7

⁶ Framework Travel Plan Section 5.9

We can say with confidence that the 'Occupier Provided Transport Data' only relates to delivery vehicles arriving and departing from the site on occupier business. Adding staff commuting to the data will raise the total from the source data from '**2,417**' to '**4,294**'.

Returning to Table 5.1, the 'Development Trip Generation', it follows that the daily total shown should be **4,294**, not **2,415**. This cannot be passed off as a 'rounding error'. The unsubstantiated appearance of a breakdown between 'Car', 'LGV' and 'HGV' in Table 5.1, and the errors in that table's totals highlighted earlier, raise the suspicion that the numbers of 'Cars' and 'LGV's shown have simply been reverse engineered from the assumed total of **2,415**.

Framework Operational Management Plan (OMP)

Moving to the 'Framework Operational Management Plan' in the document set, we find another, different interpretation of the 'Proposed Occupier Traffic Numbers'.

Table 3.2: Site Access Development Traffic

Access		08:00 – 09:00	17:00 – 18:00	Daily
Northern Access	In	61	108	498
	Out	108	56	498
	Total	169	164	996
Central Access	In	-	-	173
	Out	-	-	173
	Total	-	-	346
Southern Access	In	62	108	534
	Out	109	56	534
	Total	171	164	1,068
Total	In	122	216	1,205
	Out	217	111	1,205
	Total	339	327	2,409

*Errors due to rounding

Here we see a different interpretation of the 'Proposed Occupier Traffic Data'. Again, the arithmetic used to provide totals throughout the table does not stack up, however we note the curious footnote stating, but not actually referencing, 'Errors due to rounding'.

The figure to note here is the final total for daily vehicle movements, shown here as '**2,409**' rather than the '**2,415**' shown in the previous table. This is all the more surprising since the source data once again, is **Appendix B**, this time however, reworked as **Appendix A** to the 'Framework Operational Management Plan (OMP)', see next page.

*APP/21/00200 - New Lane / Eastern Road residents' group response to:
'Supplementary Transport Assessment' and related documents posted on July 4th 2021*

In this 'new' appendix, the base data from Appendix A is used unchanged, but the table is extended with apparent mathematical alignment to provide the 'vehicle split' and 'site access split' data required for the OMP.

This 'new' Appendix is shown in two parts, the first being a 'Daily Traffic Profile':

Daily Traffic Profile		6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	0	1	2	3	4	5
Cars	Total	206	157	121	-	39	-	-	-	43	11	-	105	157	71	-	37	133	1	-	-	-	-	-	-
	In	89	157	121	-	39	-	-	-	16	1	-	-	-	-	-	-	117	-	-	-	-	-	-	-
	Out	117	-	-	-	-	-	-	-	27	10	-	105	157	71	-	37	16	1	-	-	-	-	-	-
Vans	Total	-	144	216	94	-	81	45	45	45	30	164	223	94	-	50	24	-	-	-	-	-	-	-	-
	In	-	-	-	-	-	23	23	23	23	8	157	216	94	-	50	12	-	-	-	-	-	-	-	-
	Out	-	144	216	94	-	58	23	23	23	23	7	7	-	-	-	12	-	-	-	-	-	-	-	-
HGVs	Total	-	2	2	2	2	-	-	-	-	2	2	2	-	-	-	-	8	8	8	8	8	8	8	8
	In	-	1	1	1	1	-	-	-	-	1	1	1	-	-	-	-	4	4	4	4	4	4	4	4
	Out	-	1	1	1	1	-	-	-	-	1	1	1	-	-	-	-	4	4	4	4	4	4	4	4
Total	Total	206	303	339	96	41	81	45	45	88	43	166	329	252	71	50	60	141	9	8	8	8	8	8	8
	In	89	158	122	1	40	23	23	23	39	10	158	217	94	-	50	12	121	4	4	4	4	4	4	4
	Out	117	145	217	95	1	58	23	23	50	34	8	112	157	71	-	49	20	5	4	4	4	4	4	4

Once again, no daily totals are shown on this chart. Simple arithmetic shows a daily round trip split of 540 cars, 630 vans and 39 HGVs – a total of **2,403** – still short of the **2,413** shown as the overall total on the same chart. This van total may be slightly more realistic, being 73% of the planned capacity of the van parking deck however **it is still 25% higher than the 505 stated in Table 5.1**. Once again, these discrepancies cannot be passed off as 'rounding errors'.

A 'Daily Traffic Profile by Access' is also given, re-interpreting the 'Occupier Traffic Data' showing a projected split of traffic movements across the three proposed site entrances:

Daily Traffic Profile by Access		6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	0	1	2	3	4	5
Northern Access	Total	26	151	169	47	18	40	23	23	23	15	82	164	126	34	25	30	-	-	-	-	-	-	-	-
	In	26	79	61	-	18	11	11	11	11	4	79	108	47	-	25	6	-	-	-	-	-	-	-	-
	Out	-	72	108	47	-	29	11	11	11	11	3	56	79	34	-	24	-	-	-	-	-	-	-	-
Central Access	Total	154	-	-	-	2	-	-	-	43	11	-	-	-	2	-	-	133	1	-	-	-	-	-	-
	In	37	-	-	-	2	-	-	-	16	1	-	-	-	-	-	-	117	-	-	-	-	-	-	-
	Out	117	-	-	-	-	-	-	-	27	10	-	-	-	2	-	-	16	1	-	-	-	-	-	-
Southern Access	Total	26	153	171	49	20	40	23	23	23	15	82	164	126	34	25	30	8	8	8	8	8	8	8	8
	In	26	80	62	1	19	11	11	11	11	4	79	108	47	-	25	6	4	4	4	4	4	4	4	4
	Out	-	73	109	48	1	29	11	11	11	11	3	56	79	34	-	24	4	4	4	4	4	4	4	4
Total	Total	206	303	339	96	41	81	45	45	88	41	164	327	252	71	50	60	141	9	8	8	8	8	8	8
	In	89	158	122	1	40	23	23	23	39	9	157	216	94	-	50	12	121	4	4	4	4	4	4	4
	Out	117	145	217	95	1	58	23	23	50	33	7	111	157	71	-	49	20	5	4	4	4	4	4	4

Analysis of this data simply compounds the inconsistencies already found between the base data in Appendix B provided by 'the proposed occupier' and the 'Development Trip Generation' data derived in the 'Supplementary Transport Assessment'.

The data shown in the 'Framework Operational Management Plan' is, we conclude, as unsound as the rest of the data from which it is derived.

Summary

The Applicant, through their Transport Consultant, writes that "The proposed site traffic for the site has been presented and agreed with **HCC who have confirmed that the data is robust.**"

We do not agree. As the analysis in this document shows, there are significant inaccuracies and inconsistencies in the base data which have been compounded into inconsistent predictions of traffic generation which have little or no credibility.

Based on our April 6th response to the first round of documentation and the first response from HCC, both HCC Highways and HBC Environmental Health acknowledged our point about the risk of residential rat-run traffic, but found our 'worst case' traffic projections (at that time showing 5,393 daily movements at the site gates) to be unrealistic.

Our current assessment, documented above, shows an expected daily set of movements at the site gates to be **4,294**, rather than the **2,415** claimed by the Applicant. This is no longer our 'worst case' figure, but our expectation for the average daily movements, seven days a week, based on the source data available in the 'Proposed Occupier Traffic Data' and the limited employment detail derivable from the rest of the application.

We also wish to highlight once again **the misleading description of this proposed development** in the management summary sections which 'top and tail' the transport documentation.

It should be noted that the description of the proposed development, repeated in the 'Executive Summary', the 'Introduction' and the 'Summary and Conclusions' sections of the Supplementary Transport Assessment is extremely misleading. These may well be the only sections read by some reviewers, who will see the proposed development described as a **"last mile' distribution centre, where parcels are delivered via small vans to customers in the local area"**.

This proposed development is not last mile/local delivery, it is a distribution hub in the middle of a residential area in an already congested town. The body of the documentation⁷ makes clear that **only 5%** of the destinations served by this development would be local, with **71%** of the deliveries requiring direct access to the A27, for Southampton, the New Forest and Winchester in the west, Chichester and Worthing in the east and the remaining **24%** of the deliveries requiring direct access to the A3(M), for Guildford and Woking to the north.

⁷ 'Transport Statement' – Table 5.6

*APP/21/00200 - New Lane / Eastern Road residents' group response to:
'Supplementary Transport Assessment' and related documents posted on July 4th 2021*

Access south to the A27 from New Lane is constrained by the railway crossing points, primarily at Park Road North, while access to the A3(M) is constrained by the residential areas of Bedhampton and Leigh Park. These routes into and out of Havant are already heavily congested at peak times and adding high and unnecessary levels of new through traffic without major road improvements such as the proposed Southleigh link road will seriously impact town centre traffic.

The proposed development would predominantly be a 'traffic generator', adding significantly to the peak time loading on Park Road South, New Road, Bedhampton Road, Bedhampton Hill, Middle Park Way, Hulbert Road and the B2149 northward towards Horndean. Since the van drivers will have fixed 'delivery promise' based schedules, **there is a high risk that this traffic will spill over into the local residential rat-runs already heavily used by pedestrians, cycles and school children.** While planning conditions could theoretically prevent this for delivery van drivers, enforcement of such conditions is unlikely. Staff commuting traffic, including van drivers arriving in the early morning and departing mid evening and the midnight shift warehouse handover cannot, of course, be subject to conditions.

We have raised these points before and respectfully request that Havant Borough Council's Planning Department and the HBC Planning Committee give them very serious consideration.

A complete assessment of this planning application is not possible until an accurate projection of the traffic movements are given. This, in turn, is not possible until full details are available of the staffing levels, shift patterns and projected volume growth.

As presented, **the traffic projections included in the Applicant's documentation lack accuracy and precision and the underlying 'proposed operator traffic data' is demonstrably unsound.**

While this development could bring welcome, if relatively low quality employment to the town, **the New Lane employment site**, surrounded as it is by residential properties and with 95% of the development site traffic routing to the A27 and the A3(M), **is not an appropriate location for this proposed development.**

Bob Comlay, July 27th 2021

*Co-ordinator – New Lane / Eastern Road Neighbourhood Watch scheme
Chair – Havant Civic Society*

On behalf of:

*New Lane / Eastern Road Neighbourhood Watch scheme residents
Havant Civic Society members*