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Enquiries to

Holly Drury

My reference

HD 6/3/13/165 (6546)

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Your reference

APP/14/01225

Date

6th November 2015

Email

Holly.drury@hants.gov.uk

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).

Thank you for the opportunity to comment on the above application proposing a mixed use development at Land North of Market Parade including 130 residential dwellings and 6 commercial units.

The Transport Assessment (TA) refers to scoping discussions held with Hampshire County Council regarding the development. Whilst we acknowledge an early discussion was held no formal advice or agreement has been provided regarding this development site.

Policy Review

The transport assessment (TA) considers the policy background to the proposals, providing a summary of national, regional and local policies. This assessment is deemed acceptable.

It should be noted that Havant Borough Council are currently undertaking work looking at a more comprehensive redevelopment of the wider area and therefore there is a risk that the long term availability of the surrounding road network is not guaranteed. It is currently proposed that servicing of the development is to be from the public highway that consequently may not be

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

viable.

Existing Land Use

The site is currently occupied by 9 small commercial units totalling approximately 516sqm at ground floor level and 14 two bed dwellings at first and second floor. It is noted that the commercial units are currently unoccupied and the residential units are only partially occupied.

Existing Traffic Flows

Traffic flow data in the vicinity of the site were undertaken on Wednesday 3rd and Saturday 6th June. Surveys were undertaken at the following junctions:

- North Street/Waterloo Road Priority Junction
- North Street/Prince George Street/Market Parade Crossroads
- North Street/Elm Lane Roundabout
- Market Parade/Elm Lane Priority Junction
- Park Road/Elm Lane/Park Way Signalised Junction
- North Street/The Pallant Priority Junction; and
- North Street/East Street/South Street Junction.

Surveys were undertaken at weekday peak periods from 7am to 10am and 4pm to 7pm. The weekend peak was also recorded between 12pm and 3pm. The peak hours have been calculated from the surveys as 8-9am, 5-6pm during the week and the Saturday peak hour is 12-1pm.

In addition manual classified turning counts, on-street and car park utilisation surveys have been undertaken on Thursday 16th, Saturday 18th and Sunday 19th July 2015. The parking matters are to be dealt with by our agents at Havant Borough Council who shall respond separately.

Forecast Traffic Flow

The impact of the development has been assessed up to 2020. NTM growth factors have been obtained from TEMPRO and applied to the 2015 base data. The background traffic growth factors used are 1.086 for the AM peak, 1.090 for the PM peak and 1.093 for the Saturday peak hour. These are deemed to be acceptable.

Development Access Proposals

Vehicular Access

It is proposed to provide vehicle access from North Street via a give-way junction. A drawing of the proposed access has been provided on drawing number 14-006/004.

Free flow vehicle speeds have been recorded on Wednesday 3rd June and Thursday 4th June between 10am and 12pm. The 85th percentile speeds recorded were 23mph northbound and 29mph southbound. The recorded vehicle speeds result in a required visibility splay as per Manual for Streets of 30m and 43m. In order to achieve the southbound visibility splay it has been

stated that 18m of on-street parking will need to be removed. This area of parking is subject to a Traffic Regulation Order (TRO) and will therefore require public consultation for any amendments. Therefore the visibility splay cannot be guaranteed at this stage. The removal of on-street parking in a town centre location is not ideal and therefore proposals should be considered which can avoid these changes, especially with the retail nature of the development.

At this stage the design details for the access are limited as shown on drawing 14-006/004. Therefore we are unable to comment on whether the proposals are acceptable. A drawing showing clearly the design of the access including visibility splays and vehicle tracking is required before formal comments can be provided.

Internal Layout and Parking

Matters of internal highway layout and parking shall be considered by Havant Borough Council engineers under the terms of the agency agreement.

Sustainable Modes Access

No specific details have been provided regarding pedestrian and cycle access to the site. The TA refers to four cores, one of which including a lift and that these shall be accessed via Market Parade, North Street and the pedestrian area of Market Parade. Further details are required on this and specifically how this interacts with the public highway.

Generally in the wider area the site is generally well served for by pedestrians and cyclists. In addition there are a number of local improvements which have the potential to provide direct benefit to the site such as crossing improvements on the route to Havant College. The applicant should undertake a more detailed study regarding key routes for pedestrians and cyclists to determine the suitability of the wider routes to access the site.

Traffic Impact

Trip Generation

The TA presents the proposed vehicular trip generation rates for residential dwellings during weekdays, shown in the table below. The residential vehicular trip rates have been derived using the TRICS database.

130 Residential Dwellings	Morning Peak Hour			Evening Peak Hour		
	Arrive	Depart	Total	Arrive	Depart	total
Trip Rate (per unit)	0.057	0.176	0.139	0.071	0.072	0.112
Combined Trip Rates (per unit)	0.233		0.21	0.184		
Generated Trips	7	23	18	9	9	15
Combined Trips	30		27	24		

Having reviewed the TRICS data it is apparent that the Greater Manchester location is not reflective of comparable environments with regards transport related links. This is resulting in a lower trip rate being forecast than we would expect for this type of area. The sites used for the TRICS assessment should be reviewed and the trip rates used within the TA adjusted accordingly.

It is not proposed that the retail units will generate any additional trips. However although the area is a town centre location and it is appreciated that the majority of customers will already be making a trip to town it is considered that a percentage of new trips will be generated, including journeys for staff. This should be considered by the applicant.

Traffic Distribution & Assignment

The traffic generated from the site and background growth has been assigned to the network using the turning count information collected. The methodology used is acceptable.

Traffic Impact Assessment

The impact of the development traffic on the local highway network has been assessed for the following junctions:

- North Street/Waterloo Road Priority Junction
- North Street/Prince George Street/Market Parade Crossroads
- North Street/Elm Lane Roundabout
- Market Parade/Elm Lane Roundabout
- Park Road/Elm Lane/Park Way Signalised Junction
- North Street/The Pallant Priority Junction
- North Street/East Street/South Street Priority Junction

A trip generation factor of 1:1 for the development has been used and no deductions have been made for the existing trips from the occupied residential units. Whilst in theory this produced a robust approach the zero additional trips assumed for the retail development remains an outstanding issue. An assessment should be undertaken to determine the new trips generated from the proposed retail use and these allocated to the network.

In addition whilst the TA lists that the above schemes have been assessed table 7.1 only shows the results for 4 of these junctions. The largest impact is at North Street/Prince George Street/Market Parade Crossroad which sees an increase of 6.6%. Where any increase is forecast for a junction a more detailed analysis is required to understand the impact on each arm of the junction.

Personal Injury Accident Data

Details have been provided of the Personal Injury Accidents (PIA) history within the vicinity of the proposed site between 1st May 2010 and 30th April 2015. It is noted that 6 personal injury accidents have occurred in the vicinity of the site, all of which have involved vulnerable road users. The level of

accidents involving pedestrians and cyclists is a concern and the applicant should consider how they can appropriately address this issue with regards to the increased pedestrian, cyclist and vehicle traffic they are proposing and prevent exacerbating the current situation.

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. This principle is supported.

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 suggests that walking, cycling and public transport use for this site will be higher than surrounding areas of the ward due to a lower level of car parking. This suggestion is supported.

The document states that targets will be set once initial travel surveys have been carried out at the 65th 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.

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 monitoring by HCC should also be reflected in the document.

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.

Transport Contribution

Within the TA contributions have been suggested to aid with mitigating the wider impact of the proposed site as part of the regeneration scheme. In addition a contribution toward pedestrian and cycle improvements has been offered. This will need to be finalised and agreed following the additional assessment work set out in this response.

Recommendation

As set out above, there are a number of matters which need to be addressed, and further information is requested. Should the Local Planning Authority seek to determine this application as submitted then it is recommended that it be refused on highway and transport grounds 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 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.

- 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 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