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Date	26 June 2012	Email	stephen.jenkins@hants.gov.uk

For the attention of Stephen Cantwell

Dear Sir

APP/12/00338 Dunsbury Hill Farm – Hybrid planning application comprising a part outline application for employment uses and a hotel and part detailed application for a new link road with bus gate to Woolston Road

Thank you for your letter dated 20 April 2012 and for the opportunity to comment on above planning application.

I have reviewed the application in detail and assessed the Transport Assessment (TA) against the guidance set out in the DfT publication *Guidance on Transport Assessment* and the National Planning Policy Framework, published by the DCLG. I wrote to the applicant's transport consultants, Atkins, on 23 December 2011 with my considerations of the draft TA and this was copied to Lucy Howard in your department. I have commented in this letter on whether my points have subsequently been taken into account in the final TA and the submission satisfactorily amended.

Planning Policy

The National Planning Policy Framework has been published subsequent to the preparation of the TA and, as you will be aware, replaced PPG13 with immediate effect.

No mention is made of the 2011 white paper entitled *Creating Growth, Cutting Carbon: Making Sustainable Local Transport Happen*. The South East Plan is covered, but no mention is made of the fact that government intends, and is taking steps, to abolish it.

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

I am pleased to confirm that TA now includes information on the Dunsbury Hill Farm Development Brief (2007), which was previously absent.

Development Proposals

The development proposals that are the subject of the planning application are for 67,535 square metres of floor space, this is known as Phase 1 and Phase 2. The land uses are for B land use classes and a hotel.

New Site Access

The site access is proposed from Hulbert Road. The reasons for not providing access direct from the A3(M) J3 are understood (levels, junction spacing and environmental constraints) and the principle of the proposed access is agreed as a concept. I note that access arrangements and the link road are the only element of the proposals for which detailed planning permission is being sought at this time. Figures 4.2 to 4.5 (Drawing numbers 5099849/TP/GA/101/102/103/104, all revision B) illustrate the access arrangements. On receipt of the planning application I was particularly keen to ascertain whether the designs had been amended in line with the comments in my letter of the 23 December 2011. Given that the access detail is submitted for full permission it is essential that this part of the application is fully agreed prior to planning permission being granted. As you know I am currently undertaking a full review of the access roundabout and link road and will provide comprehensive comments on these elements during w/c 9 July. In the meantime these general comments should be of some use.

Pedestrian Refuges on the link road

These have not been added to Drawing Number 103/Rev B. I still require this omission to be amended.

Footways on southern side of the link road

Subsequent to my previous letter, a 2m wide footway has now been shown on the southern side of the link road, set back from the carriageway in a similar fashion to the footway/cycleway on the northern side of the carriageway. This is acceptable.

Pedestrian crossing facilities on hotel roundabout splitter islands

This does not appear to have been added to Drawing Number 103/Rev B. I still require this omission to be amended.

Bus Gate and Bus Stops

No measures are shown at the easternmost plot access road junction to discourage or prevent vehicles (other than buses) heading all the way to the bus gate. Unless this is done then vehicles will unnecessarily attempt to use the bus gate and have to reverse back. I suggest that the easternmost plot access junction needs to be reconfigured to change the priority away from the bus-only road or the applicants should explain what signing will be installed to prevent general traffic from using the road abortively.

The bus stops will require shelters. The applicant's consultants should provide information on these. I will expect the applicant to provide real-time information screens at the bus stops, in line with the Development Brief statement on bus information systems.

As highlighted at the start of this section further checking of the on site proposals is underway. I will issue further more detailed comments on the internal highway matters in due course.

Public Transport Proposal

Paragraph 4.13 to 4.17 of the TA outline the applicant's public transport proposals.

Paragraph 4.14 states that bus routes 39 and 23 pass immediately to the east of Phases 1 and 2 respectively. Whilst it appears that the nearest parts of both phases are within 100 crow-fly metres of the route of bus service 23 as it runs along Calshot Road (but further from the bus stops), service 39 appears to run 400 crow-fly metres from Phase 1 and 850m from Phase 2. The applicants will need to explain his calculations here. The latter distances fall beyond those usually deemed acceptable for public transport accessibility in new developments and make it important that bus accessibility into the site itself is provided.

Paragraph 4.15 of the TA states that the applicant is committed to the Cross-Borough Bus Service (CBBS) being delivered as part of the Dunsbury Hill Farm development. The CBBS appears in the Core Strategy and Development Brief. Appendix H of the TA contains a letter which the TA states demonstrates commitment to this service. However, the letter only states that '*provision*' will be made for an east/west link road, giving the '*opportunity*' of an east/west CBBS link.

This is not acceptable to the County Council and does not meet the Core Strategy development requirements for a dedicated transport link between residential areas to the east and west, which I take to mean Waterlooville and Leigh Park / Havant town. The Core Strategy also requires that measures to maximise the proportion of journeys to and from the site by public transport, cycling and walking must be demonstrated by the applicant. Maximising the proportion of journeys to and from the site will rely – in part – on better links to the nearby residential areas which are currently unserved by direct bus services. This will be best achieved through the provision of a bus service through the site on the east-west link road.

The County Council will require the applicant to contribute to the timely commencement of the Havant CBBS through a s106 agreement, in line with the Core Strategy Policies CS21 and DM11. Discussions are required between the applicant, local bus companies and the County Council to ensure that an acceptable bus service proposal is prepared and agreed in advance of planning permission being granted. It will be important for agreement in principle to be reached on delivery so that the statement relating to

'dramatically' or 'substantially reduced' journey times between Waterlooville and Leigh Park can be quantified. At this stage it should also be noted that the applicant has not outlined any mechanisms to ensure any local bus service operates through or into the site whatsoever. The proposed development simply does not work in planning terms without this certainty.

I also have concerns about the accessibility to bus services from the northernmost proposed employment land plots. These plots are up to 500m away from the link road, and pending the confirmation of bus services on the link road, there does not appear to be a direct means of pedestrian access to reach the bus stops on Calshot Road. The applicant's consultants should explain how the northern plots are to be served by bus or otherwise accessed by bus users.

Walking & Cycling Access Proposals

Paragraphs 4.18 to 4.23 of the TA discuss non-car access. As per the draft TA, the final TA states that the main pedestrian access will be from Woolston Road in Leigh Park, and the main cycle access from both Woolston Road and Park Lane (Havant Bridleway 123). Paragraph 4.20 states that Park Lane will be maintained. For clarity I presume the applicant means that the route will be preserved and not diverted, which is acceptable. Mention is then made of upgrading Park Lane, and other rights of way, which was absent in the draft TA. Notwithstanding this the application should indicate the sections of rights of way which would be affected by the site-wide approach to upgrades outlined in paragraph 4.21. Core Strategy Policy CS18 states that providing a metalled surface to Park Lane is a development requirement. It is not clear if this is to be provided.

Pedestrian and Cycle Access from the west

The Development Brief states that a network of routes for pedestrians and cyclists should '*link with the adjacent settlements*' and '*provide or enable new links within the settlements*'. It goes on to say that financial contributions will be sought towards transportation initiatives such as improved cycle links between the site and various locations, mention being made of, amongst other places, Waterlooville town centre. However, I do not feel that the routes proposed by the applicant constitute an acceptable network. Links to Waterlooville are not provided and therefore my comments relating to access from the west still remain.

In my letter of December 2011 I stated that a strategy was required to address this deficiency. The applicant's transport consultants have provided a technical note on the subject, appended to the TA as Appendix G. Paragraph 4.19 of the TA explains that the assessment found that routes across the A3(M) at Junction 3 '*are not advisable based on safety and cost issues balanced against expected demand*'.

Whilst I accept that low-cost options may not be possible at this junction, connections to the west must form part of the proposed network to serve the application site in order that pedestrians and cyclists are not faced with unsafe

crossings to what will be the Borough's key new employment site. The technical note does not appear to have taken account of the partial signalisation of the roundabout which will be funded by the West of Waterlooville Major Development Area (MDA) and which I mentioned in my letter of December last year. The applicant should provide a revised pedestrian and cycle strategy in light of this scenario in which the motorway off-slips are signalised. Consideration should be given as to whether the safety fencing (which would, in its current form, prevent use of the southern roundabout bridge) can be relocated to enable a southern route to be considered.

Traffic Forecasting Assessment Methodology

As per my pre application letter to the applicant the Sub Regional Transport Model which is the fundamental transport assessment tool for this site (the SRTM) assumes that the Cross-Borough Bus Service will come into operation in line with the development. The statements in the applicant's final TA relating to the 'opportunity' to provide it does not give sufficient assurance that this service will come into existence in line with the SRTM modelling. Unless an agreement is entered into relating to the provision of the CBBS then the modelling assumptions will be incorrect.

Without Development - Transport Schemes

As mentioned above, the planning applicants for the West of Waterlooville MDA are legally committed to delivering the signalisation of A3(M) junction 3. The layout shown in Drawing Ref 51 Rev B which I previously sent to the applicant should be tested with development traffic and the TA amended to reflect this.

With-Development - Transport Schemes

Paragraph 5.17 states that existing bus service 23 (Leigh Park to Southsea) would be extended from Leigh Park to Dunsbury Hill Farm. However as stated above, the applicant has given no evidence that Stagecoach will alter its service to enter the site.

VISSIM modelling

The VISSIM modelling (which has been used to assess the local network in more detail) still distributes the development traffic 85% via J3 and 15% via J3. This is contrary to the SRTM output and as highlighted in my pre application correspondence is considered to be unrealistic.

In addition I am concerned about some other aspects of the VISSIM modelling, for example the TA at paragraph 6.3 states that "minor network changes were made to the VISSIM models to adjust to the higher demand in the future year models". It goes on to state that this includes adjusted "lane change parameters by reducing safety distances and allow easier lane changing to reflect drivers becoming more aggressive". These adjusted parameters can have a strong influence over saturation flows and overall network performance. With this in mind, the changes are not seen as "minor" and further details regarding how the values were arrived at and which

links/connectors they have been applied to are necessary. Whilst drivers may become more aggressive as congestion increases, quantifying this "aggression" is impossible. Accordingly, driver behaviour parameters in the Base and Forecast year models should be the same. Changing the values in the Forecast year models may be masking the true impacts of the development.

A combination of the traffic split between J3 and J4 along with adjustments to the future years VISSIM modelling lead me to have significant concerns that the TA does not represent the actual impact of the development.

Traffic Impact of development

As highlighted above the assessment methodology remains the same as the draft TA and that methodology (principally distribution and future years parameters) mean that the impact has not been fully quantified at this stage.

Notwithstanding this, 5 junctions are assessed with scenarios outlined for 2019 and 2026 and two sensitivity tests, first using higher trip rates from TRICS (rather than SRTM) and secondly assuming the completion of the partial signalisation of Junction 3 of the A3(M). Outputs are shown in terms of queue length in metres and journey times in seconds.

Comparison between the scenarios would be made easier if the applicant had placed comparative data next to each other in the same table. I have undertaken this for analysis purposes, concentrating on the three junctions which the applicant highlights as having the greatest forecast queues (A3(M) Junction 3, Junction 4 (west roundabout) and the Asda Roundabout). They are set out for the AM and PM peak periods overleaf.

AM Peak Hour

		Queue Lengths in metres							
		2011 Modelled Base	2019 Base	2019 w/Ph 1	2026 base	2026 w/Ph1	2026 w/Ph 1+2	Sen Test 1	Sen Test 2
A3(M) Junction 3 / B2150 Hulbert Road	J3 southbound off-slip	31	35	20	17	15	18	17	16
	Hulbert Road East	26	144	118	80	83	69	72	60
	J3 northbound off-slip	16	18	24	18	29	31	35	41
	Hulbert Road West	41	78	111	54	100	122	176	76
Hulbert Road / Purbrook Way r't	Hulbert Road North	43	8	11	9	9	11	13	11
	Purbrook Way East	56	119	171	268	177	254	329	211
	Hulbert Road South	26	30	43	83	335	192	301	165
	Purbrook Way West	24	74	99	215	260	274	307	276
A3(M) Junction 4 west r't	J4 off-slip	27	29	26	37	36	37	46	35
	Purbrook Way Purbrook Way West	18	40	38	133	150	131	306	105

PM Peak Hour

		Queue Lengths in metres							
		2011 Modelled Base	2019 Base	2019 w/Ph 1	2026 base	2026 w/Ph1	2026 w/Ph 1+2	Sen Test 1	Sen Test 2
A3(M) Junction 3 / B2150 Hulbert Road	J3 southbound off-slip	23	17	19	19	22	22	21	22
	Hulbert Road East	16	33	38	37	79	65	77	84
	J3 northbound off-slip	30	41	42	31	34	38	39	49
	Hulbert Road West	12	36	29	44	40	50	34	35
Hulbert Road / Purbrook Way r't	Hulbert Road North	47	62	150	99	189	315	317	327
	Purbrook Way East	37	34	168	37	221	165	434	163
	Hulbert Road South	36	94	64	410	103	91	117	73
	Purbrook Way West	58	362	356	368	352	340	343	356
A3(M) Junction 4 west r't	J4 off-slip	32	151	160	129	170	188	155	167
	Purbrook Way West	22	294	328	377	366	350	387	379

There appears to be quite significant increases in queuing lengths which occur between the 2011 modelled base and the 2019 and 2026 base scenarios. It would have been useful for the applicant to have provided some commentary as to whether this is as expected. In addition I note that in some 'with development' scenarios traffic is predicted to:

- Queue back from Junction 4 of the A3(M) to the College Road junction on Purbrook Way;
- Queue from Junction 3 of the A3(M) almost as far west as the Frenstaple Road / Tempest Avenue roundabout;
- Queue significantly from the Asda roundabout along Purbrook Way (East) and Hulbert Road (North and South).

Whilst the applicant states that the queues will not conflict with other junctions, they are quite considerably more than is currently experienced at these locations. This is of concern to the County Council and will require mitigation. It is reasonable expect the applicant to commit to achieving a nil detriment solution via a balanced and viable mitigation package

It is also worth noting that the queue lengths decrease on some arms despite additional traffic being added. The TA suggests this is a result of the higher demand creating a slightly different arrival profile in VISSIM for vehicles at the junctions and hence different gap opportunities at the roundabouts. I disagree and suggest this unexpected result is a function of adjusting the future years VISSIM parameters where driver behaviours have been altered in the future years resulting in more aggressive gap acceptance which is perhaps unrealistic and masks the true impacts of the development.

B2150 Hulbert Road / Purbrook Way Roundabout

My letter to the applicant's transport consultant in December noted that no scheme to improve this roundabout had been submitted with the draft TA. This was despite the draft assessment predicting a significant increase in queues on the roundabout approaches, and a recommendation in the TA that some mitigation would be required to reduce the delays. I requested that this be rectified in the final TA. As you will know this matter is now the subject of a separate study seeking to design a scheme which overcomes the queuing forecast to occur due to the proposed development. I am expecting the study to be submitted to the County Council for approval in August. It is worth noting that the study is being carry out on traffic forecasting assumptions that are yet to be agreed as detailed above. The detailed modelling of the scheme at the B2150 Hulbert Road / Purbrook Way Roundabout this may need to be revisited once we have agreement on the above points and a favoured type of junction emerges

Mitigation Measures

As per the draft TA, the only physical works to mitigate the transport impact of the development are the access, east-west link road and bus gate. At this stage this is considered to be inadequate in the light of the above concerns.

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

Framework Travel Plan

Appendix F of the TA contains a framework travel plan for the site and paragraphs 7.6 to 7.10 of the TA report summarise it. In general terms it includes many useful suggested measures, but several depend on the occupier, the working patterns of their staff and the corporate view of sustainable travel. Therefore it is difficult to be certain as to the effectiveness of the measures at this stage.

I do however note once more that the issue of the CBBS is identified in what is termed the '*public transport strategy*'. In reality this refers only to information provision and ticketing arrangements. This is unacceptable and the travel plan for the site will need to be based around firmer plans for a better bus service to and through the site.

The information provided on the proposed annual monitoring survey identifies for four potential datasets, including passenger information from local bus operators. This is unlikely to be available to the occupiers in a suitably disaggregated form to be of use to travel planning and should not be included. Information on the number of staff / visitors will, of course, be required to be able to make statements about proportions of travel by various modes. In reality a short questionnaire of staff covering home postcode and usual means of travel may elicit the most relevant information.

The County Council will require more certainty over those Travel Planning measures which will be introduced and who will be responsible for delivering them. The cost of those measures will need to be secured in a Section 106 Agreement and that funding will be returned to the developer on completion of the Travel Plan monitoring which evidences satisfactory implementation of the measures. The Council's costs of approving and monitoring the Travel Plan will also need to be covered in the Section 106 Agreement.

Recommendation

Thank you for the opportunity to comment on this planning application. There remain several outstanding concerns on which the applicants and their consultants should provide further information. These concerns need to be addressed before I would be in a position to be able to recommend granting planning permission from a transport and highways perspective.

I trust the above is clear and I will write again by mid July on the internal details but in the meantime please do not hesitate to contact me on the above number should you wish to discuss anything further.

Yours faithfully


Steve Jenkins

Team Leader - Highways Development Planning South & East

cc: Highways Agency, Federated House, London Road, Dorking – Neil
Andrew