



Planning Development,
Havant Borough Council,
Civic Centre Way,
Havant,
PO9 2AX.

16th November 2018

Dear Sir or Madam,

Objection to APP/18/01033 Land East of Castle Avenue, Havant

Thank you for the opportunity to comment on the above-mentioned planning application. I have had the opportunity to review the planning application documents online and wish to object to the development.

I believe that it is unreasonable for Havant Borough Council to allow this development to proceed until such time as:

- The borough-wide road transport assessment promised in the Infrastructure Delivery Plan (IDP) allied to the Local Plan is complete and public scrutiny of it has taken place in particular in relation to the impact of the Warblington Level Crossing, and,
- The cumulative impact of the potential development adjacent to this site is taken into consideration.

The former of these points is essential given the significant issues that the Warblington Level Crossing causes to the roads of concern to this application. The latter is relevant to prevent each developer from salami-slicing the impact of the development whereby both claim their individual development is acceptable, whereas considered as one site it would not be.

Having scrutinised the traffic assessment undertaken by Mode transport planning consultants, there are a significant number of methodological flaws and factual inaccuracies that render the validity of their conclusions void. My detailed comments are below, however in summary they have neither correctly approached the problem nor drawn the correct conclusions based on their own data. The Mode analysis suggests that the 69-property development, with 173 parking spaces and at peak times a car a minute leaving or arriving, will have 'imperceptible' impacts on the local traffic environment. This is more traffic than produced by the houses in St Georges Avenue and Castle Avenue combined at present! I trust that given other highly dubious transport assessments historically conducted in the local area that the Council will be seriously scrutinising the transport assessment.

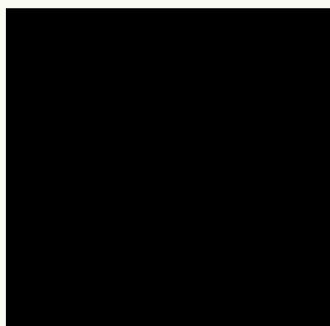
In addition to the flawed traffic assessment I would also like to highlight the fact that the density of the development is substantially higher to that on the surrounding streets and places the road as out of character with the local area.

Finally, whilst I appreciate it is early in the planning process, I would expect to have seen some information from the developer outlining how they would be a considerate constructor should they gain approval. Given that the steps in the planning process are relatively unclear to me I will take this opportunity to highlight my concerns to give the developer the opportunity to address them:

1. The end of St Georges Road between the junction of Warblington Avenue and Southleigh Road is very busy during school pick up and drop off (8am-9am and 1.30pm to 3.30pm depending on the day of week). There is parking on both sides of the road making it difficult to traverse for more than a single car. Furthermore, there are lots of school children around at these times. Construction traffic should be discouraged from using this end of the road at these times.
2. The surrounding roads to be kept clean and mud free at all times.
3. Construction traffic to drive slowly and considerately at all times bearing in mind that St Georges Avenue is a well-used part of the national cycleway system.
4. No parking on St Georges, Warblington or Castle Avenues during construction.
5. No construction noise at weekends and nothing outside reasonable working hours during the week.

I trust that my comments are clear, but if not am happy to elaborate by phone.

Yours sincerely,



Detailed Comments on the Road Traffic Assessment

The analyses of the road network that were requested during the local plan process were:

- Firstly, to consider how traffic calming could be applied to mitigate speeding to and from the new development and,
- Secondly to prevent worsening of traffic exiting St Georges Avenue onto Southleigh Road particularly for traffic heading north.

The latter issue is of particular concern. Unfortunately, whilst the traffic analysis undertaken by Mode has included copious analysis of road junction capacity assuming otherwise unconstrained traffic, it has ignored the fundamental point - that the traffic is neither unconstrained or independent of the level crossing. Junction capacity per se is not really the subject of concern, worsening the impact of peak period queues at the junction to the level crossing is. Much of the analysis presented is therefore irrelevant and the actual consideration of the effect of the level crossing is addressed with some hand-waving comments, assumptions and no analysis. This topic has not therefore been considered and the developer cannot make assertions that assume it has. In Section 6.2.1, Mode themselves explicitly state that the interaction between the St Georges/Southleigh junction and the level crossing has not been modelled. They cannot therefore draw any categoric conclusions about it, yet that does not seem to have stopped them.

Where the road consultant has briefly looked at the level crossing, they have made inaccurate measurements and assumptions. Even a cursory glance at the road layout and markings would show that a queue of 52m is the distance from the level crossing to the keep clear section of the road at the cycle path crossing and not 78m as documented. Cars turning out of St Georges cannot get across when there is a single car behind this keep clear area on the road. Furthermore, section 6.4.4 states that 'in practice drivers will likely let a waiting vehicle out once the crossing is clear and traffic moving again'. This highlights how little genuine observation of the junction has been undertaken. Once the barriers rise, traffic heading south from the north side of the level crossing is continuous and cannot be crossed until the entire queue of traffic has passed. This can take many minutes, and often spans multiple openings/closings of the level crossing.

Where junction modelling has been undertaken the results are only presented as average delay figures (averaged over an unclear duration). It is the peak delays that matter as they dictate how much additional time to build into a journey so that you can still arrive on time. No information is therefore given to allow an understanding of the true impact of the development on peak delays.

Analysis of the impact of the development on surrounding streets are predicated on an assumption of traffic following the census pattern of travel. This does not provide any material sensitivity analysis given that actual patterns are unlikely to fit the census average. I would expect a high-quality assessment to provide more thorough sensitivity analysis to provide confidence that the transport consultant has not just cherry picked the best-case scenario.

Consideration of the need for traffic calming has been predicated on measurements from the Automated Traffic Count (ATC) conducted on Warblington and St George's Avenues. The analysis in Section 6.3 is also somewhat cursory. Table 6.5 presents only average speeds measured by ATC. However, traffic calming measures are not needed for average speeds, but for the upper extremes of traffic speed. Results and conclusions should be re-stated with peak

speeds. The peak results for both streets show a number of vehicles travelling between 40-45mph in a 30mph limit. Some even reach 45-50mph in a 30mph zone. This is clearly totally excessive and demonstrably makes the case for traffic calming and/or a lower speed limit in these residential streets.

The APC that was positioned in St Georges Avenue was located at the Castle Avenue end of the street to which the least traffic flows and where speeds are the lowest (traffic at that end is either stopping at the houses or turning to/from Castle Avenue). The speeds and traffic volumes are therefore not representative of the street with the future development, nor are they capturing most of the traffic flowing through the Southleigh Road junction. This combined with the above issue presents an erroneous picture of a lack of need for traffic calming.