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Date	6th November 2018	Email	Holly.drury@hants.gov.uk

For the Attention of Jean Chambers

Dear Madam

Land at Newgate Lane (North), Fareham – Outline planning permission for the demolition of existing buildings and development of up to 75 dwellings, open space, vehicular access point from Newgate Lane and associated and ancillary infrastructure, with all matters except access to be reserved.

Thank you for consultation on the above planning application. It is understood that this application is to be considered in conjunction with an adjoining application for land to the south of this site for 125 dwellings, which is yet to be submitted. The application considers the cumulative transport impacts of both sites coming forward.

Site Location

The land is currently agricultural land situated to the east of Old Newgate Lane and the west of Newgate Lane. The current agricultural access to the site is from a field gate on Old Newgate Lane to the north of the site. Old Newgate Lane currently serves approximately 90-100 residential dwellings, two small vehicle repair garages, a small car showroom, two nursing homes and the Peel Common Sewage Works.

Policy Context

A number of transport policies have been considered within the application. This includes Hampshire County Council's Transport Contribution Policy (2007). However, the level of contributions needs to be assessed alongside NPPF to ensure consistency with statutory policies.

Newgate Lane

Newgate Lane as noted within the TA has recently been diverted with Newgate Lane East being open to traffic on the 8th April 2018. The new alignment is a wider, higher standard route with fewer side roads and drive way accesses compared with the original alignment. Work to Peel Common roundabout has also seen capacity improvements together with the closure of vehicular access to old Newgate Lane

allowing it to be utilised as a safer and quieter cycling route and providing a valuable missing link in the cycle network between Peel Common roundabout and HMS Collingwood.

This infrastructure makes up part of the 'Improving Access to Fareham and Gosport' strategy to promote investment and employment. The technical assessment for this strategy assumed development of existing brownfield regeneration sites and not redevelopment of greenfield development sites along the corridor. The primary aim of the strategy is to stimulate the provision of employment and investment in employment opportunities within Gosport.

Access Proposal

A single point of access is proposed for this development via a simple T junction arrangement on old Newgate Lane. During pre-application discussions for the wider proposals it was highlighted that access onto old Newgate Lane should be limited and a single point of access with an emergency access would be considered sufficient for the total proposed scale of development (including the southern site). Details of the proposed access for the southern parcel are absent from this submission therefore the access arrangements for both sites cannot be considered holistically. Details of the southern access proposals should therefore be provided. Within the submission it is outlined that both sites are intended to be considered together. In the absence of the supporting evidence for the application for the adjoining land to the south I am unable to comment on the principle of the access arrangements.

Regarding the design of the access proposals, these have been reviewed and the following comments relate to the proposals put forward within drawing BRS.489 Figure 8.

Speed surveys have not been undertaken by the applicant. The Old Newgate Lane has recently been reduced to 30mph. Visibility splays have been shown to be achievable at 2.4m * 112m. Without survey data we are unable to confirm that these visibility splays are acceptable. There is a risk that speeds remain higher than the posted limit and therefore survey data is required to ensure appropriate visibility splays can be met.

It should be noted that there is existing vegetation along the frontage which would obstruct the achievable visibility. It is also noted that the visibility from the site access to the south runs through the site. From the masterplan it is not clear what the proposals for the site boundary with Newgate Lane will consist of. It does appear to show the area to be public open space. The full visibility splay will be required to be dedicated as highway and be free from obstructions and any planting. This should be secured appropriately through condition and cannot be part of any public open space dedication.

No tracking drawings for the proposed access arrangement have been provided and these are required in order to demonstrate that the junction can operate safely. This should include tracking for a super large refuge vehicle passing a large car. It will also be necessary to show tracking for construction traffic assuming this access is also to be used for construction.

Sustainable Travel

Figure 7 of the TA has been provided to identify nearby local facilities. No isochrones have been provided demonstrating the distances of these facilities from the proposed development site. Some written assessment of walking distances has been undertaken for example to nearby schools and convenience stores. It is not clear however which specific facilities are being referred to. A clear assessment of walking distances should be provided which details specific locations and the walking distances. These should be listed as actual walking route distances rather than as the crow flies.

Walking and Cycling

As part of the new alignment of Newgate Lane pedestrian/cycle crossing provision has been provided in the form of a pedestrian refuge island. This crossing provides access to the Bridgemaury area and makes up what would be the route to school from the site. No detailed assessment of the number of crossing movements has been undertaken as part of the TA. Whilst an assessment of additional movements as a result of 75 dwellings has been undertaken this has not been considered with particular regard to school journeys as a result of development. This should be considered to ensure that the refuge crossing remains suitable for the forecast demand. Existing numbers of crossing movements have also not been recorded to determine whether controlled facilities would be warranted. Forecast demand should be provided for both peak pedestrian hours and across the day.

The crossing in its current form is on an unlit section of Newgate Lane. This is to protect the rural nature of this section of road and was considered at planning to be necessary to protect the strategic gap. If additional development is permitted west of Newgate Lane and crossing demand increases lighting of this section of Newgate Lane as a result will need to be considered to ensure safety of all road users considering the intensification of its use. The applicant should assess this as part of this application.

The crossing requirements of Newgate Lane should be considered against the additional proposed development land to the south of the site as a sensitivity test so that total forecast demand can be fully understood.

Regarding Old Newgate Lane, it is proposed to provide uncontrolled crossings from the site access to the western footway. The existing footway appears narrow in width. Confirmation is required regarding this and the need for any additional width in order to accommodate development footfall.

No assessment of the walking route to facilities to the west of the site has been undertaken. In particular the route to Crofton School should be reviewed.

Public Transport

The nearest bus stops to the site are located on the realigned Newgate Lane at the Woodcote Lane crossing. These are 0.4miles from the site entrance and therefore exceed the recommended 400m away. Service provision from the site is limited with less than an hourly provision between Fareham and Hill Head. This is a subsidised

service and therefore measures should be considered by the applicant to ensure that the limited service is secured via private funding.

Tukes Avenue provides access to a more frequent bus service between Gosport and Fareham however the stops are located some distance from the site at 0.8 miles. The TA refers to the stops being less than 600m from the site however this is not agreed. The attractiveness of this service is therefore diminished by the distance from the site although it is acknowledged that it utilises the BRT network increasing the potential demand for the service due to more consistent reliability in journey times. The suitability and attractiveness of the walking route relates back to the requirement for a review of the suitability of the uncontrolled crossing facilities on Newgate Lane.

Vehicle Trip Rates

Vehicle trip rates have been provided at a rate of 0.565 two way in the AM peak and 0.629 in the PM peak. These are noted to be taken from the Newgate Lane Southern Section TA and are considered acceptable for the purpose of this application.

Distributions and Assignment

No survey data has been collected by the applicant of the revised layout of Newgate Lane despite works being finished on the site in April 2018 as noted within the TA.

Survey data is required to support any application as with the new layout operational it is not considered robust to rely on forecast data. The SRTM model utilised for the Newgate Lane South alignment TA was written has been superseded through further work to the model as a result of design work for Stubbington bypass. Surveyed turning proportions from existing residential traffic at the Old Newgate Lane/Newgate Lane junction should be used to inform the distribution at this junction. This methodology has been adopted within the TA but based on the forecast turning proportions from HCC's Newgate Lane planning application rather than observed data.

The distribution cannot be agreed in the absence of this recorded vehicle flow and turning count data.

The Highway Authority have undertaken recent data collection for the completed scheme including a traffic turning count at the Old Newgate Lane/New Newgate Lane and Peel Common roundabout. This has demonstrated that traffic flows along the route are higher than forecast within the modelling work therefore supporting the need for assessments of the junctions along the route being based on survey data.

Background Traffic Growth

It is proposed to utilise TEMPRO to determine background traffic growth. This approach is considered robust. However, given the nature of the route the applicant should ensure there is no double counting of the impact from development more remote from the site such as Daedalus.

The TEMPRO growth factors cannot be agreed until confirmation of the above matter has been provided and the growth factors are obtained for all modelling time periods.

Internal Layout and Parking

Internal layout matters are considered by our Agent at Fareham. It should be noted however that given comments on the access proposals that the applicant should explore the ability to provide internal vehicle access between the northern and southern application to allow a single point of access to be achieved.

Car parking requirements are a matter for the planning authority. However, it is noted that details of the parking requirements have not been put forward within the TA and are stated to be a matter to be dealt with as reserved matters. These should be set out and agreed with the planning authority to ensure suitable levels of parking are provided within the site.

Construction Traffic Management Plan

It is noted that within the TA the applicant makes a commitment for a construction traffic management plan. This should be secured through a suitable pre-commencement condition and require details in relation to the following:

- Construction access
- Control of mud and debris from the site
- Vehicle routing
- Contractor parking
- On site turning provision
- Adequate provision for addressing any abnormal wear and tear to the highway
- Programme for construction.

Committed Development

It has been assumed that development proposals for the following committed schemes have been included within the assessment of the need for the new alignment of Newgate Lane:

- HA2 emerging local plan allocation for 475 dwellings
- Gosport Waterfront
- Solent Enterprise Zone – Daedalus
- Solent Business Park – Phase 2
- Welborne

This is not correct. The TA for the southern section of Newgate Lane under application number P/15/0717/CC states that committed development included within the SRTM as follows:

- Solent Enterprise Zone - Daedalus
- Solar Panel Farm
- The Retreat, Newgate Lane

The TA also refers to the general traffic growth from the proposed Welborne development to be included within the background growth assumptions within the STRM.

The HA2 emerging allocation was also not subject to any local plan emerging policy at the time of the TA and therefore has not been included within any forecasting assumptions and should not be considered as a committed development or one considered within the modelling for the new alignment of Newgate Lane.

There is no evidence that the Solent Business Park phase 2 development or improvements to Gosport Waterfront were also included within the SRTM assumptions.

Further consideration must be given by the applicant to how committed development is to be included within any growth forecasting to traffic on Newgate Lane and the junctions subject to capacity assessment. It is considered that development traffic from the Gosport Waterfront and Daedalus should be manually assigned. The remaining committed development could be appropriately addressed using TEMRPO.

Junction Assessment

Junction assessments have been carried out for the following junctions:

- Old Newgate Lane /Proposed site access junction
- Newgate Lane/Old Newgate Lane priority junction
- Newgate Lane/Longfield Avenue roundabout
- Peel Common Roundabout

No assessment has been undertaken of the Newgate Lane/Speedfields Park roundabout or the HMS Collingwood signal junction and this should be included within the assessment.

The assessment years are not in accordance with the pre-application discussions. All junctions have been assessed on a 2019 base year only. No assessments have been provided for a forecast year of 5 years post development as industry standard would expect. On the assumption of a build year of 2019 an assessment year of 2024 should be undertaken by the applicant, so the highway authority is able to ascertain the impact of the development on the surrounding highway network.

It is noted that assessments have been undertaken based on with and without Stubbington Bypass. Details however are required relating to the assumptions made regarding the redistribution of traffic with the opening of Stubbington Bypass both for development flows and more widely as a result of redistribution. It is also noted that the capacity assessments have been undertaken to include both this application's development traffic and for traffic generated from the proposed application to the south.

Regarding the junction of Old Newgate Lane/Newgate Lane modelling has been provided for the full right turn lane. This methodology is acceptable. The TA then goes on to theoretically split the junction in to two junctions modelling the right turn movement in two separate phases. Whilst it is acknowledged that the design of the right turn lane has been put in place to accommodate this movement to be undertaken in two stages it cannot be assumed that this is how the junction operates for all right turn movements. The layout of the junction does not require right turns to

be undertaken in this way. The modelling results in tables 5 and 6 are therefore not considered relevant to the assessment.

Old Newgate Lane/Newgate Lane Junction

Details on forecast annual average daily traffic should be provided for the site as well as recorded daily traffic flows for Newgate Lane. This will allow for an assessment of the junction form to be undertaken.

HA2 Emerging Allocation Sensitivity Test

Throughout the TA the applicant refers to the HA2 emerging allocation as a development with planning policy status. For clarity this emerging allocation is subject to an objection from the Highway Authority within the Local Plan process. It has not been subject to the full local plan assessment process and therefore should not be considered to be committed development. The proposals for a roundabout and potential wider connection to Bridgemarky for sustainable travel can therefore not be considered as secured for the purpose of this application. Further assessments required by the applicant should therefore be considered on this basis.

It is noted that a contribution to provide footway connections from the site access to the Old Newgate Lane/Newgate Lane junction have been proposed in order to provide connections to the potential HA2 allocations site access. This would be considered beneficial to secure should this application progress for planning approval.

Vehicle trip generation from the HA2 site has been assumed to be at the same rate as for this site. This approach is agreed.

The following committed development schemes that need to be considered to 2036 sensitivity test are set out as:

- Gosport Waterfront
- Solent Enterprise Zone – Daedalus

Distribution from these sites has not been manually applied to the corridor. It is assumed within the TA that these would be reflected within TEMPRO figures. A growth factor has been derived using TEMPRO 'AF 15 Dataset 2010-2040' figures. For Fareham these are shown to be 1.1584 in the AM peak and 1.1562 in the PM peak. No further explanation has been provided to ensure that these figures are robust. Given the location of sites it would be considered that the specific impact of these developments on Newgate Lane should be accounted for through manual assignment of the trips.

With regard the junction of Old Newgate Lane/Newgate Lane the form of junction would change as a result of development on the HA2 site. As part of the local plan proposals this has been tabled as a roundabout arrangement. This has been tested to a 2036 forecast year in the absence of the emerging Local Plans evidence base. This has however only been assessed in a with Stubbington Bypass scenario. This arrangement should also be tested in a without Stubbington Bypass scenario. The development should also model the existing junction in this scenario, so an understanding is established regarding the operation of the junction without the provision of a roundabout.

All junctions should be modelled in a with and without Stubbington Bypass scenario for 2036.

As previously outlined the results of this modelling work cannot be commented on until the necessary base data has been utilised to undertake the modelling work.

Personal Injury Accident Analysis

No accident data has been provided by the applicant as the current alignment of Newgate Lane and Old Newgate Lane has only been in place for 6 months. Whilst this may be the case for the direct site access and the Old Newgate Lane/Newgate Lane junction other junctions subject to assessment should also be reviewed for accident patterns that may be exacerbated by the additional development. This should therefore be included within the TA.

Travel Plan

The Travel Plan (TP) 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". This TP was formulated by Pegasus Group and encompasses the development of 75 dwellings, on behalf of Fareham Land LP. The TP was of a generally high standard. However, there are areas that will need to be addressed before it is accepted as part of the proposed development.

Background

It is noted and welcomed that relevant planning policies are referenced. There should also be inclusion of the developers own policies on travel plans and sustainable travel. This may be in the form of:

- A statement from the developer
- A quote from the developer's website

Consultation and partnerships

It is noted that the TPC will act as a "liaison" with public transport, local authorities and other relevant groups. There should, however, be a commitment within the TP for the TPC to engage directly with other stakeholders in the area. These will include, but are not limited to:

- Other TPCs for sites close to this one, Newgate Lane (South) for example if there is a different TPC. Liaising with other TPCs in the vicinity provides a higher chance of aligned outcomes
- Local cycling shops, e.g. to establish discounts, or provide training
- Public transport operators, to organise discounts and vouchers
- Schools in the area

Site Audit

Where referenced, please include a copy of the Figures within the text.

Section 3.1, this is a TP for Newgate Lane (North), should this read Newgate Lane (South)?

Section 3.4 should state 75 dwellings not 755.

The audit for current conditions is considered inadequate. There should be inclusion of current highway conditions, including pavement provisions (the western side of Newgate Lane is mentioned but not to an adequate level of detail) on roads surrounding the site as a minimum. Photos of existing conditions are expected.

Section 3.5 "*Detailed analysis of local facilities and amenities*" what are these? Include them on the map. Section 4.1 states that Figure 2 shows a plan for these facilities. Figure 2 in the submitted PDF is "PEDESTRIAN INFRASTRUCTURE AND CYCLE ROUTES". This is missing. On this map should be all amenities mentioned as well as walking isochrones up to a maximum 2km distance.

"As noted previously it is proposed that Woodcote Lane will be made good with a tarmac surface" what does this mean?

4.2 should describe the walk to the bus stop as well as the stop's provision e.g. covered / live update monitors.

Rail 4.11 should mention the type of cycle parking provided at the station.

Targets

The targets are considered acceptable and use of 2011 census data is welcomed.

There should be a brief explanation as to why you have chosen a 10% reduction in SOV and why you think the other modes are likely to increase (especially +3% in WFH). This does not need to be detailed but will help inform future targets.

Measures

The measures section is not considered adequate. As part of this section each of the measures should include the following:

- A timescale
- Who will take on the responsibility of the measure?
- A cost associated with each measure

We would expect a travel plan of this scope to include a commitment to provide public transport vouchers to the residents as part of the welcome pack. This is to maximise the uptake of sustainable modes from the outset.

Hants Carshare is no longer a funded initiative. It would be useful to promote another car sharing website, for example Liftshare or any other.

It is understood that the site (with exception of accesses) are reserved matters. However, will there be commitment to provide car charging points / a study into the need for charging points should residents require them?

Is there a reason that PTP is not offered from the outset by the TPC?

How many bicycle parking spaces will be provided on-site and in what style?

The TPC should commit to liaising with local cycle shops in order to provide information on deals and offers within the welcome pack.

Will there be any car parking measures implemented within the site? Previous examples have included:

- Review of car parking policy and introduce a management strategy
- Review of the issuing of car park permits to ensure a fair system, based on agreed criteria e.g. operational need
- Consider the introduction of charging for parking
- Allocate priority parking space to car sharers

There is commitment for the TPC to provide information to the residents; however, will there be an option for the residents to contact the TPC, should they require assistance?

Roles and responsibilities

It is noted that a TPC will be appointed. There should be a time period associated with their implementation, for example; “to be established at least 3 months before occupation for the duration of the travel plan”.

The estimated cost of the TPC should be included.

There should be commitment made in the TP for the TPC to establish a residents steering group for the development. This will ease the transitional period at the end of the TPC’s contract, as highlighted in 6.5.

It may also be of interest (should the site require it) for a BUG / local pre-existing BUG in the area to be set up / contacted. These groups are an invaluable source of information and may shed light on the lack / abundance of cyclists in the area, which in turn can shape future measures.

Monitoring

The monitoring section of the TP is not adequate. It is noted that a residential questionnaire will be carried out. This is supported as a robust methodology for monitoring. These surveys should be conducted 6 months after the first occupation of the site to provide a baseline, and then on the 1st, 3rd and 5th anniversary.

As well as these commitments the following is required within the TP:

- An example of the survey which is specific to the site. HCC can provide a standard questionnaire, but it is the responsibility of the organisation to be consistent with questions asked so a comparison can be made over time. This information must be collated and sent to the local authority on a standard form by an agreed date before it is issued to residents.
- TP surveys should achieve a response rate of 35% (which should be mentioned in the TP). There should be measures in place to encourage resident participation to meet the 35%. These may include; prize draws (e.g. for major online retailer vouchers) for those who fill out the survey.

Please could you clarify what is meant in 7.4 with regards to “The TPC will commission or carry out the monitoring of the surveys.”

What is the time period between the surveys being completed and the submission of the monitoring report to HCC?

Delivery and enforcement

There is no mention of, or inclusion of costs associated with the Travel Plan bond / cash deposit as well as review and monitoring fees. These are required to be within the TP.

Conclusion

The TP 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 TP before it can be considered acceptable for submission in conjunction with the proposed residential site.

Recommendation

Additional information is required in order to support the application. This includes:

- Traffic surveys
- Personal injury accident data review
- Revised modelling to a forecast year of 2024
- Revised sensitivity test modelling
- Commitment to a CTMP
- Updated travel plan
- Assessment of the Newgate Lane pedestrian refuge island demand
- Assessment of lighting need for new Newgate Lane alignment
- Further assessment of the footway provision on Old Newgate Lane
- Review of committed development assumptions
- Further details on the approach to distribution
- AADT for the Newgate Lane/Old Newgate Lane junction
- Additional junction assessments of the Speedfields Park roundabout and the HMS Collingwood signal junction.
- Confirmation on car parking matters
- A review of TEMPRO double counting.

Should you be minded to determine the application before this information has been supplied for review, the Highway Authority should be contacted for reasons for refusal.

I trust the above is clear, but please do not hesitate to contact Holly Drury on the above number should you wish to discuss anything further.

Yours Sincerely,

Ben Clifton
Transport Team Leader – Highways Development Planning

Cc – David McMahon – Fareham Borough Council