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P/22/0165/OA

Date

8 April 2022

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For the attention of Peter Kneen

Dear Sir,

Land East of Newgate Lane East, Fareham. Outline Application With All Matters Reserved (Except Access) For Residential Development Of Up To 375 Dwellings, Access From Newgate Lane East, Landscaping And Other Associated Infrastructure Works

Thank you for consulting the County Council on the above planning application. The following comments have been provided by the County Council, both as an upper tier authority and in its capacity as local highway authority and authority responsible countryside services. It is noted that separate responses have been submitted on behalf of the County Council as Local Education Authority and Lead Local Flood Authority.

A summary of the comments is provided below, with the full technical response from the Local Highway Authority included in Appendix A, and countryside and rights of way in Appendix B.

The County Council notes that the new Fareham Borough Council Local Plan was submitted for examination in September 2021, with examination hearings subsequently taking place in March and April 2022. A report from the Inspector on the outcome of these hearings is expected shortly.

The Council notes that this site was removed from the emerging Plan by Fareham Borough Council following the Regulation 18 Draft Local Plan consultation. Representations were made by the local highway authority on the Regulation 18 Local Plan raising concerns about the proposed allocation. In summary, the local highway authority considered that, on the basis of the

evidence available at the time, the proposal would unacceptably undermine the purpose of the Newgate Lane improvements.

It is understood that the site's promoters have subsequently made representations objecting to the omission of this site from the Local Plan and that this matter is the subject of active consideration by the Planning Inspector examining the Local Plan.

In this context it is noted that the emerging Local Plan proposes a spatial distribution for growth in the borough and this has been supported by evidence which considers the cumulative impact of that specific spatial distribution on infrastructure and environmental considerations. Clearly, if the Inspector were to conclude that the Local Plan was unsound, and that there was merit in further consideration of new development sites to help address their concerns, this would be the subject of further work and evidence base preparation.

The impact of this development, were it to be granted for this planning application, has not featured as part of any such recent assessment to date. Noting the scale and location of the proposed development in relation to current highway improvements and other proposed development in the area, the County Council considers that granting permission at this time would be premature. This is particularly the case considering the advance stage of the Plan's preparation.

Notwithstanding the above, the Local Highway Authority has reviewed the evidence submitted by the applicant to date. On the basis of the information provided by the applicant in this regard, the County Council a local highway authority considers that the proposal is contrary to Paragraphs 110, and 111 of the National Planning Policy Framework.

The reasons for refusal may be overcome by the applicant submitting the information detailed in the recommendation in the full technical response set out in Appendix A. Should further information be forthcoming the Local Highway Authority will review its position accordingly.

In summary, the County Council has concerns that the proposal is premature in the context of the emerging Local Plan which is currently at a late stage in its preparation and that it is contrary to planning policy relating to highways operation, safety and accessibility. It therefore would recommend that the application be refused.

Yours faithfully,

A solid black rectangular box redacting the signature of Stuart Jarvis.

Stuart Jarvis
Director of Economy, Transport and Environment

Appendix A: Full response of the Local Highway Authority

The comments below are in response to the Transport Assessment (TA) dated 27 January 2022 and residential Framework Travel Plan dated 24 January 2022 submitted as part of this application.

Background

The application land was previously included in the Borough Council's emerging local plan as an allocation for 475 dwellings known as HA2 and was removed from the emerging local plan, which is currently undergoing examination. When this site was a proposed allocation, the local highway authority raised the following objection to allocation HA2 (Hampshire County Council Draft Local Plan consultation response dated 8 December 2017):

'The purpose of the current improvements to Newgate Lane is to address existing traffic congestion and environmental issues on Newgate Lane and other corridors providing access to the Gosport peninsula and to facilitate better strategic access to jobs at the Solent Enterprise Zone at Daedalus (which is also the case for the proposed bypass of Stubbington that would pass through the gap between Fareham and Stubbington). An aim of the Enterprise Zone is to contribute to reducing the number and duration of vehicle trips on roads on the Gosport peninsula, in particular out commuting towards the A27 IM27 to access employment in the morning peak travel period. It is therefore the policy of the County Council to maintain the utility of the improvements provided to Newgate Lane in these terms. Consequently the proposed housing allocation which is likely to increase both the levels of out-commuting from the peninsula in the morning peak travel period and negate the purposes of the Newgate Lane improvements is not supported.

In view of the above comments, Hampshire County Council objects to policy HA2 (Newgate Lane South).'

Furthermore, as noted in the TA, the County Council's is currently preparing its Local Transport Plan (LTP4) which will provide its primary transport policy to 2050. The draft LTP4 is currently subject to public consultation and can be found here: [Draft Local Transport Plan 4](#). The proposals set out in the scoping note are contrary to the draft policies of the emerging LTP4 in terms of access onto the local highway authority's primary road network. It is anticipated this document will be adopted as policy in 2022. Draft policy DM2 paragraph i) states that:

*'We will...only support requests for **NEW accesses onto A roads, the principal road network or traffic sensitive streets** where the strategic flow of traffic is prioritised and not compromised and when all other reasonable options (such as taking access from nearby side roads) has been considered;'*

Finally, regarding the approval of 99 dwellings accessed via Brookers Lane (P/19/1260/OA), it is correct as stated in the TA that the inspector found the site

acceptable, including with regard to accessibility. However, it is also noted that the appeal sites west of Newgate Lane (P/18/1118/OA and P/19/0460/OA) were not considered accessible, with the inspector concluding:

'The limitations are such that they would not be in an accessible area, with particular reference to public transport and walking facilities, and I do not regard the sites as being sustainably located.'

The sustainability credentials of this site will therefore need to be explored in detail, particularly in the context of LTP4.

Existing Conditions

Walking and Cycling

A Walking, Cycling and Horse-Riding Assessment and Review (WCHAR) has been completed, assessing routes in the local area. However, while the WCHAR notes schools will be a primary trip generator, this assessment does not include routes to any of the catchment schools. The County Council's Children's Services department has confirmed there are no plans to reconsider catchment boundaries at this time. The development lies within the current catchment areas of the following schools. Approximate distances to these schools have been included in brackets.

- Crofton Anne Dale Infant and Junior (4,600m)
- Wallisdean Infant and Junior (2,900m)
- Fareham Secondary Academy (2,400m)
- Crofton Secondary (3,100m)

A WCHAR review should be completed for the routes to the catchment schools; particular attention should be paid to cycle provision given distances from the site. Furthermore, only footpath routes to Stubbington have been considered. These do not allow for cycling and, unless significant improvements are undertaken to surface and light the routes (none are proposed), these routes would not be suitable as amenity links. As such, the alternative routes to amenities within Stubbington, in addition to routes to schools, should be considered.

As identified in the WCHAR, there is an existing network of pedestrian and cycle facilities. Footways are provided linking to most amenities and there are cycle links towards Fareham, Gosport and Stubbington. However, there are some inadequacies in the existing provision. The applicant has proposed improvements, which are reviewed in the Development Proposals section below.

Regarding cycle provision, the BRT busway (Henry Cort Way) is open to cycles and provides a high-quality link to Fareham town centre, with the exception of one missing link on Redlands Lane as described below. Similarly, there is an off-road link south to Gosport Town Centre. The link towards Stubbington only extends as far as Crofton Secondary School. Consideration should be given to how pupils will access the catchment schools of Crofton Anne Dale Infant and Junior by cycle.

Connections to the south of the application site, via the consented Brookers Lane development (19/00516/OUT) are proposed, allowing access to Brookers Lane shared use pedestrian and cycle path. An onward connection across Newgate Lane East to Woodcote Lane is available. It should be noted that a financial contribution of £78,160 is secured from the Brookers Lane development towards pedestrian/ cycling improvements at the Brookers Lane crossing of Newgate Lane East. This contribution is not specifically towards implementation of a Toucan Crossing.

Tukes Avenue and Wych Lane, that form a primary link from the site to the BRT are not designated on Fareham Cycle Map as 'link roads convenient for cyclists'. The WCHAR states that these roads are a slow speed traffic environment, making the route comfortable and attractive for on-road cycling. This is considered acceptable for Tukes Avenue; however, Wych Lane is more heavily trafficked and has potentially higher speeds. Consideration should be given to improvements for cyclists on Wych Road, between Tukes Avenue and the Henry Cort Way.

The bus services in the vicinity are considered acceptable to adequately serve the development. The routes to bus stops are also appropriate, subject to the site access points being confirmed as deliverable and securing improvements to pedestrian and cycle (given the BRT has cycle parking available) facilities on these routes. All stops on Tukes Avenue have shelters, however there is no provision of Real Time Information (RTI) at the Stones Close and Woodcot Primary School stops; provision of RTI would significantly encourage travel by sustainable modes. A contribution of £16,000 towards the provision of RTI would be considered adequate mitigation.

The rail services from Fareham Rail Station are considered acceptable to adequately serve the development. There are links to the rail station via bus and cycle (noting the required improvements).

Regarding the assessment of the existing vehicular network operation, it was confirmed during pre-application discussions that the use of the Manual Classified Count (MCC) surveys undertaken in January 2019 are considered acceptable subject to the application being submitted prior to the end of January 2022 and being appropriately factored to account for traffic growth. It was also noted that additional traffic data covering a wider area is likely to be required, subject to agreement of traffic distribution and assignment. Both these points are covered in the Traffic Impact section below.

Whilst the peak hours identified in TA (Morning Peak Hour 07:45 – 08:45 and Evening Peak Hour 16:00-17:00) do not align with standard network peak hours (08:00- 09:00 and 17:00-18:00), the survey data shows that across the network, the accumulated total of highest traffic flows occur at the peak hours used in the TA. Therefore, the peak hours the applicant has used are considered suitable and applying the associated peak hour baseline flows in the junction modelling assessments is considered a robust approach.

In addition to the Manual Classified Counts (MCC) carried out in 2019, Automatic Traffic Counts (ATC) were completed in 2021 on Newgate Lane East, to the north and south of the old Newgate Lane/ Newgate Lane East junction. The table below compares the more recent ATC flows with the MCC data. The comparison between MCC and ATC recorded traffic flow volumes show the ATC flows were 9% higher in the AM peak and 3% higher in the PM peak.

Table 1. MCC and ATC Newgate Lane Data Comparison

PEAK PERIOD AND SURVEY DATA COLLECTION METHOD	NEWGATE LANE NB	NEWGATE LANE SB
MCC - AM	1,367	1,179
MCC - PM	1,293	1,512
MCC Total two-way flow	AM – 2,546 PM – 2,805	
ATC - AM	1,643	1,130
ATC - PM	1,128	1,762
ATC Total two-way flow	AM – 2,773 (9% increase on MCC flows) PM – 2,890 (3% increase on MCC flows)	

The traffic flow diagrams and junction models have been informed by the MCC counts rather than the ATC data. A proportion of the increase is expected to be due to background growth given the MCC data was collected in 2019 and the ATC data collected in 2021, however the TEMPRO growth as detailed in Table 6.6 of the TA is only 1.0209 in the AM and 1.0190 in the PM. This growth is lower than the observed difference in flow volumes.

In light of the higher flows observed via the ATC method of data collection compared to MCC in the 5-day peak average counts, a sensitivity junction model test should be provided by the applicant for the proposed site access in the 2037 future year scenario to demonstrate what the impact in the uplift in traffic on Newgate Lane East will have on junction capacity and operation to ensure that the proposed design can still accommodate this variance in demand. This additional assessment will ensure that the proposed site access junction model is robust and the impacts of the additional movements on the main arm are fully understood. Given the ATC data is only available for Newgate

Lane East, Newgate Lane traffic flows can be derived from the MCC counts for use in the assessment.

Regarding traffic flow diagrams, these show the baseline MCC traffic surveys, committed development flows, percentage trip distribution and forecast development flows within figures TF1 to TF35. However, it is noted that the traffic flow diagrams do not include the bypass straight ahead lane at the Newgate Lane/ Speedfield business park roundabout. The applicant should include this movement within the flow diagrams to allow clear transparency of flow data inputted into the junction models.

Additionally, the traffic flow diagrams and wider network junction models do not include the Gosport Road/ Palmerston Drive junction and the associated Newgate Lane flyover. This therefore leads to misleading and discrepant traffic flows coming in and out of neighbouring junctions. Following agreement of trip distribution and assignment, it is anticipated this junction should be modelled in order to ascertain any wider junction impacts associated with the additional trip generation of the proposed development, particularly given that the A32 Gosport Road represents a key local highway link.

Regarding the cycle counts on Newgate Lane, while useful, permanent cycle counters do not pick up all types of cycles and actual cycle movements are likely to be slightly higher than presented.

Personal Injury Accident (PIA) data recorded in the vicinity of the site for the latest available 5-year period have been provided within the TA. The study area for PIA analysis will be confirmed upon agreement of trip distribution and assignment. As stated in the TA, the signalised junction of A32 / Wych Lane is being upgraded and the Peel Common roundabout junction has further works underway to fully signalise this junction. In addition, the Quay Steet roundabout will shortly undergo a complete resurface, which is anticipated to improve safety at this location.

The review of accident data and conclusions within the TA are accepted with the exception of the junction of Newgate Lane/ A32 Gosport Road interchange, where it is considered a cluster of personal injury accidents could be exacerbated by additional development traffic. It is noted that the current traffic distribution does not forecast development traffic to travel through this junction, however, this distribution is not accepted (comments below). The applicant should consider mitigation in this location.

Development Proposals

Pedestrian/ Cycle Site Access Arrangements

As noted above, no sustainable mode assessment or WCHAR has been carried out on the routes to the catchment schools. This is required.

Regarding links from the site to the existing pedestrian and cycle network, a number of access points are proposed as shown on drawing ITB10535-GA-013 Rev A. The comments below follow the numbering of this plan for reference.

Regarding access points 1 and 2 from the site to Public Right of Way (PROW) 76, which is a surfaced and lit footpath and cycleway, the following comments are made.

- No design or detailed access point location appears to have been submitted for access point 2. This is required.
- The applicant should confirm land within their control abuts the existing highway boundary.
- There are a number of significant trees in the vicinity, however, if access locations are carefully chosen at the detailed design stage should the development come forward, it is considered arboriculture and ecology constraints will be surmountable.

The following comments are made in relation to access point 3, linking from the development site to Tukes Avenue (in vicinity of 143 Tukes Avenue) shown on Drawings ITB10353-GA-301 Rev - and ITB10353-GA-305 Rev -. This utilises the existing gated access to the site and the adjoining service road, which is adopted highway.

- This is the only access point proposed on the eastern boundary of the site. This means future residents from the southern parcels would have to do a significant 'dog leg' to reach amenities in Bridgemark. Consideration should be given to additional pedestrian and cycle accesses on the eastern boundary of the site to achieve better connectivity.
- The applicant should confirm land within their control abuts the existing highway boundary.
- No Stage 1 Road Safety Audit (RSA1) has been carried out on these proposals. This is required and should be submitted for review.
- The link from the site to Tukes Avenue is unclear regarding vehicular and pedestrian priority. It is noted as shared use, however vehicular accesses and movements need to be carefully considered.
- The use of surface materials should be considered to reinforce the shared nature of the route.
- Adequate signage and cord paving should be shown to deal with the changing status of footways/shared surfaces.

- Cyclists exiting the site will have poor intervisibility with vehicles exiting the access roads to the rear of the existing houses. Suitable visibility should be demonstrated.
- The existing bellmouth junction with Tukes Avenue should be amended to a vehicle crossover arrangement to further highlight the presence and priority of pedestrians and cycles.
- Crossing points of Tukes Avenue are off the new/ proposed desire line. Consideration should be given to a crossing in the vicinity of this site access.
- A Traffic Regulation Order will be required to introduce parking restrictions and prevent parking on the service road.
- Additional wayfinding should be included to the BRT from this new link.

Access points 4 and 5 have been agreed under the Brookers Lane permission.

The following comments are made regarding access point 6:

- No RSA1 has been carried out on these proposals. This is required and should be submitted for review.
- Confirmation should be provided that the path from the built area of the proposed development, south of HMS Collingwood sports Pitches and north of the proposed retained western field, will it be lit and surfaced.
- The route is currently only proposed to accommodate pedestrians. This would be a more direct route from some proposed dwellings to the cycle provision on old Newgate Lane. Consideration should be given to an LTN1/20 compliant cycle route from old Newgate Lane to the built area of the proposed development.

Comments regarding access point 7 are made in the Vehicular Access Arrangements section below.

Regarding access points A, B and C, these link from the proposed site to the consented Brookers Lane development to the south. The three proposed pedestrian and cycle only connections are secured in the Brookers Lane permission under Condition 5. Should this application be permitted, delivery of these links should also be secured. However, should the Brookers Lane site not come forward, clarity should be provided regarding how links to Brookers Lane cycleway would be provided.

It is noted that no general vehicular connection is proposed between the site the consented Brookers Lane development, however an access for emergency vehicles is proposed. Regarding this proposed emergency access vehicle link

to the south, the consented Brookers Lane development includes the following Condition:

The development hereby permitted shall be carried out in general accordance with plan Ref CMP-01 Rev C and shall include:

- a) Two pedestrian and cycling links at the southern boundary of the site to the Brookers Lane cycle link in the vicinity of the existing pedestrian accesses to Brookers Lane Playing fields;*
- b) A suitable and direct internal path linking the north of the application site to the vehicular site access via the eastern boundary of the site;*
- c) A pedestrian and/or cycle link to Heron Way to the east of the site;*
- d) A single point of vehicular access to the development via Brookers Lane. No alternative or additional vehicular access points or links shall be provided. The internal site layout shall be designed to restrict the potential for any alternative or additional vehicular access points or links; and*
- e) Suitable land up to the site boundary safeguarded for pedestrian and cycle only connections to the north as shown indicatively on masterplan drawing CMP-01 Rev C, only to be implemented should development on land to the north come forward. This land shall be dedicated as public highway if practicable.*

As the emergency access will not be open to general traffic, this may be deliverable; further liaison with Fareham Borough Council is required to confirm this point. However, given the uncertainty, the Emergency Services should confirm they are satisfied with the omission of this emergency link and that the remaining emergency accesses proposed are acceptable.

Off site Pedestrian/ Cycle Improvements

Following completion of a WCHAR review, a number of improvements have been identified to routes off site and in addition to the sustainable mode site access points. This includes works secured under the Brookers Lane planning permission (P/19/0460/OA). The suggested improvements are largely implementation of dropped kerbs and are considered acceptable.

However, regarding drawing ITB10535-GA-308, Walking and Cycling Route 2 to Woodcot Primary School/ BRT (sheet 2 of 2), while the dropped kerbs proposed are acceptable, as stated in the Existing Conditions section above, consideration should be given to an off-road cycle link adjacent to Wych Lane linking Tukes Avenue to the BRT. While Tukes Avenue is considered acceptable for cyclists of all abilities, this section of Wych Lane appears higher speed and significantly more heavily trafficked.

Regarding drawing ITB10535-GA-313, Walking and Cycling Route 6 to Solent Enterprise Zone (sheet 3 of 5), consideration should be given to lighting of the Brookers Lane/ Woodcot Lane pedestrian and cycle link. There are currently two lamp columns on Woodcot Lane, however the majority of the route is unlit. Liaison with the County Council's Street Lighting team will be required to ascertain deliverability of an appropriate lighting scheme.

Regarding access across Newgate Lane, three connections are proposed. Firstly, via connection from the site to the existing crossing at Brookers Lane/ Woodcot Lane (proposed to be upgraded to a Toucan crossing), secondly at the site vehicular access, via a crossing of the northern arm of the proposed roundabout (two options submitted, as an uncontrolled crossing with refuge island and including a Toucan crossing) and finally via the exiting refuge north of the proposed vehicular access (comments above regarding cycle use of this crossing point). There is also an existing Toucan crossing in the vicinity of the western end of PROW 76, just south of the HMS Collingwood signalised junction. Given the presence of one existing and one proposed Toucan crossing to the north and south of the development site, it is considered acceptable for the crossings on the northern arm of the proposed site access roundabout and the crossing to the north of this at the existing bus stops to be uncontrolled.

Regarding access to PROWs, footpaths 74/ 71a/ 72 and footpaths 68/ 70 provide direct routes to Stubbington and have been assessed in the WCHAR. While these routes provide a slightly shorter distance to some areas of Stubbington, and are likely to be important recreational routes, there are alternative amenity links (surfaced and lit) via old Newgate Lane and Gosport Road into Stubbington. Given these routes are currently unsurfaced and unlit, running largely through open countryside, and alternative routes exist, it is considered acceptable they are not brought up to amenity link standard.

There is a missing cycle connection on Redlands Lane, from the northern end of Henry Cort Way to The Gillies, which connect to Fareham Town Centre, rail station and Wallisdean Infant and Junior schools. Improvements to this section should be considered by the applicant.

The route to the catchment schools of Wallisdean Infant and Junior and Fareham Secondary Academy north of Longfield Avenue has missing cycle connections, this should be considered in any future assessment. Similarly, the existing cycle provision on the western arm of the Longfield Avenue roundabout junction should be reviewed and improvements should be explored by the applicant.

It is noted the emerging Fareham LCWIP is likely to be adopted imminently and may raise other requirements or routes from the proposed development to amenities. The draft document is available for review via [Share Your Views On Fareham LCWIP – Commonplace](#) and the Transport Assessment should be updated to consider the findings.

Funding should be provided to undertake or update school travel plans for each catchment school, as well as to be used for investment in the promotion of sustainable travel. A contribution of £42,000 towards the producing and delivering School Travel Plans for the catchment schools is requested by our education department and this would be considered acceptable mitigation to cover this element, should the development be approved.

Vehicular Access Arrangements

Vehicular access is proposed via a new four-arm, 50m ICD roundabout at the junction of old Newgate Lane/ Newgate Lane East shown on drawing ITB10353-GA-102 Rev C. Regarding the design of this junction, the following comments can be made:

- Speed data provided in the TA lacks detail, including survey locations, weather information and the raw data. This should be provided for review.
- It is noted that using the out-of-date data supplied, and applying an uplift of 2.5mph due to missing weather data, the visibility requirements for the Newgate Lane East approaches would be 129m (Northbound) and 132m (Southbound) – both exceeding the 120m shown on the provided drawings. Visibility requirements based on updated speed surveys to TG3 should be demonstrated.
- No speed data has been provided for the old Newgate Lane approach from the west. This is required.
- The roundabout geometry shown on drawing ITB10353-GA-105 Rev B is considered acceptable at this in principle design stage. However, the gradient on approaches appears to be very flat. As such, the applicant should demonstrate suitable land is available to provide attenuation for surface water drainage required for the new roundabout. The type and location of drainage should be carefully considered to account for safety implications and accessibility for future maintenance. It is not appropriate to attenuate within the roundabout itself.
- The items raised in the RSA1 have been satisfactorily addressed, subject to acceptable inductive drainage proposals being provided. Confirmation from the auditor should be provided following any further design amendments.
- It should be noted that Ordinary Watercourse Consent will be required for diversion and culverting of the existing ditch on Newgate Lane East.
- Consideration should be given to an LTN1/20 compliant segregated cycle route from the access roundabout into the built area of the proposed development and connecting with old Newgate Lane.
- The arrangement for cyclists to leave the proposed cycle route on old Newgate Lane to and from south may require further consideration at detailed design should the scheme come forward.
- A suitable 'buffer' of 0.5m is required to shared use routes adjacent 40mph roads and should be shown.

The operation of the proposed roundabout will require assessment once an acceptable design and trip distribution and assignment have been agreed.

Site Layout and Parking Provision

It is noted that the application is for outline consent only and matters of layout and parking will be determined at the Reserved Matters stage should the development come forward. However, the applicant should note the following points for any future reserved matters submission.

- Clarity should be provided regarding whether the internal layout will be offered for adoption, which is encouraged. For any internal areas being offered for adoption, early engagement with Hampshire County Council's Section 38 team is strongly advised.
- The development should be designed to comply with Manual for Streets in terms of the design criteria including geometry, visibility, provisions for emergency vehicles and arrangements for refuse storage and collection.
- An RSA1 will be required on the internal layout.
- Auto tracking will be required for the largest vehicles entering the site to ensure adequate turning is available on site to prevent the requirement for vehicles to reverse to/ from the public highway. Tracking speeds should be shown clearly on plans.
- With regards to the "Main Streets" a minimum 5.5 carriageway width as per MfS allows, is likely to be acceptable on a straight road, however, widening on bends may be required; provision of tracking of appropriate vehicles will confirm this.
- Regarding the cycleway provision, LTN1/20 Cycle Infrastructure Design should be referenced. Shared use provision may be acceptable where pedestrian and cycle numbers are anticipated to be low.
- The internal layout should be designed to a 20mph design speed, with 25m forward visibility provided accordingly.
- As stated in the TA, parking provision will be in accordance with Fareham Borough Council's Car & Cycle Parking Standards SPD (2009); this should include the quantum of the provision and the dimensions of parking spaces. The TA states "parking to be generally provided within curtilage of individual dwellings and within communal parking areas for apartments". It should be noted that in the SPD garages will not normally count towards overall parking provision. If this is the case the developer will need to demonstrate that it is the only means of parking a car and show adequate dimensions of garage spaces.

- A mixture of allocated and unallocated parking areas to be provided as part of the development. The overall parking demand should still be met.
- Parking or other features should not impede visibility at internal junctions.

Accessibility

Distances to key destinations as presented in Table 5.2 of the TA appear accurate from the centre of the site. It is noteworthy however that the site is c.700m north to south and c.400m east to west; therefore, depending upon a future resident's location within the site, these distances could vary significantly. There appears to be an adequate range of amenities within suitable walking and cycling distances. However, while the exact routes to amenities have not been provided, it is assumed these rely on delivery of all the pedestrian and cycle connections proposed on drawing ITB10535-GA-013 Rev A. As such, surety is required regarding the deliverability of these access points as set out in the Pedestrian/ Cycle Site Access Arrangements section above. In addition, investigation and delivery of improvements to pedestrian and cycle infrastructure as set out above is required to ensure a sustainable development.

Pedestrian and Cycle Demands and Route Choice

The pedestrian and cycle demand assessment does not include any of the catchment schools. This is inaccurate and should be corrected. The assessment will be reviewed in detail following this correction.

As highlighted in the TA, a financial contribution of £78,160 was secured from application 19/00516/OUT towards pedestrian and cycling improvements at the Brookers Lane crossing of Newgate Lane East. The value of this contribution was based on 50% of the estimated cost of installation of a Toucan crossing, however it is worth noting the contribution secured crossing improvements, not necessarily installation of a Toucan crossing. As stated in the TA, given the additional movements (albeit, currently underestimated due to the omission of catchment schools) upgrade of this uncontrolled crossing to a controlled Toucan crossing will be required due to the additional pedestrian and cycle movements forecast to be generated by this development. It should be noted this will result in additional delay on Newgate Lane East. Comments on the modelling of this Toucan crossing, forecasting the resulting delay, are provided in the Junction Capacity Testing section below.

A financial contribution of £78,160 is required to provide the remainder of the value needed for the Local Highway Authority to implement a Toucan crossing of Newgate Lane East at Brookers Lane/ Woodcot Lane. The applicant has confirmed in the TA this contribution is agreed.

Travel Plan

The Framework Travel Plan is of a good standard and is considered acceptable as submitted.

Traffic Impact

The study area for junction capacity assessment will be confirmed upon agreement of trip distribution and assignment.

Baseline Conditions

The methodology used as part of the Land at Newgate Lane South application (application ref: P/19/0460/OA) to understand the baseline traffic scenario with Stubbington Bypass in place (scenario DS2) is acceptable for use with respect to this application.

The 2019 baseline traffic flows have been adjusted using the same agreed methodology that was applied for the Land at Newgate Lane South application (application ref: P/19/0460/OA).

The Local Highway Authority's pre-application response noted that the 2019 base "DS2" traffic flows presented in the TA do not match the agreed DS2 base flows set out in the Transport Assessment Rev A dated April 2019 submitted under application P/19/0460/OA. The Applicant has clarified that this is due to different peak periods being assessed. A comparison is provided in response to pre-application comments, comparing the total junction flows at a number of key junctions in vicinity of the site. The total flow volumes through the junctions are higher in the observed peak hours (07:45-08:45) and (16:00-17:00) compared to the standard network peak hours used in application P/19/0460/OA. As such, this is considered acceptable for a robust assessment.

Trip Generation

To provide a robust assessment, it has been assumed in the TA that all dwellings will be privately owned houses. The forecast trip generation of 192 two-way vehicle movements in the AM peak hour and to 194 two-way vehicle movements during the PM peak hour is considered acceptable.

Traffic Distribution and Assignment

The methodology of using a combination of Travel to Work data and a gravity model is acceptable in principle for determining an appropriate forecast development traffic distribution. The Applicant has used the TEMPRO database to understand journey purpose; this assessment provides the following journey purpose splits, which have been used in the submitted development traffic distribution model:

- Commuting: 50.4% (HB and NHB Work and Employers Business); and
- Non-Commuting: 49.6% (HB and NHB Education, Shopping, Personal Business, Recreation / Social, Visiting Friends and Relatives, Holiday / Day Trip).

The applicant has submitted a clear method for deriving this split, which is accepted.

Regarding the employment trip distribution, both Gosport 001 and Fareham 013 mid-layer super output area (MSOA) data for residents from the 2011 Census has been used as requested during pre-application discussions. However, discrepancies are noted in the destination data as not all of the destinations noted are at MSOA level. The raw 2011 Census data and methodology used to generate the destinations and car trip percentages are required to gain a detailed understanding of the employment trip distribution.

The table below presents findings in relation to the route taken and journey time for each destination. The average journey time is noted where a range is provided on Google Maps. On some occasions, routing is via the Stubbington Bypass for destinations that are considered should route via the A27 and M27, north from the site access, given the more direct routing. This needs to be revisited.

The observed traffic proportions at the site access location in the AM peak show 73.7% of traffic northbound and 26.3% of traffic southbound on Newgate Lane East. The submitted distribution is not considered representative and the applicant should amend the assumptions identified in red in the table below and resubmit the traffic distribution.

Data has been reviewed for those destinations where the proportion of car trips is nearing or over 5% only, but it is noted that all locations need to be considered by the applicant.

DESTINATION	PROPORTION BY CAR (100%)	PEAK JOURNEY TIME AS PER THE APPLICANTS TA	IS THE ROUTING CORRECT (Y/N)	IS THE PEAK JOURNEY TIME CORRECT (Y/N)*
Bridgemary	4.75%	First Route Option – 5mins	First Route Option – Y	First Route Option – Y
Eastleigh	5.61%	First Route Option – 39mins Second Route Option – 38mins Third Route Option - 37mins	First Route Option – Y Second Route Option – Y Third Route Option - N, this should not route via the bypass.	First Route Option – Y, 20mins variance Second Route Option – Y, 22mins variance. Third Route Option – N, 43mins journey time, 25mins variance.
Fareham	11.97%	First Route Option – 13mins Second Route Option – 13mins	First Route Option – Y Second Route Option – Y	First Route Option – Y, 6mins variance Second Route Option – N, 11mins journey time, 7mins variance.
Gosport	5.13%	First Route Option – 17mins	First Route Option – Y	First Route Option – Y, but 8mins variance

DESTINATION	PROPORTION BY CAR (100%)	PEAK JOURNEY TIME AS PER THE APPLICANTS TA	IS THE ROUTING CORRECT (Y/N)	IS THE PEAK JOURNEY TIME CORRECT (Y/N)*
Portsmouth	15.45%	First Route Option – 27mins Second Route Option – 34mins	First Route Option – Y Second Route Option – N, A27 should be relabelled as A27 Porchester Road	First Route Option – N, 22mins journey time, 12mins variance Second Route Option – N, 29mins journey time, 22mins variance.
Southampton	4.98%	First Route Option – 43mins Second Route Option – 42mins Third Route Option – 38mins	First Route Option – Y Second Route Option – Y Third Route Option - N, this should not route via the bypass.	First Route Option – Y, 30mins variance Second Route Option – Y, 30mins variance. Third Route Option – N, 53mins journey time, 35mins variance.
Stubbington	6.87%	First Route Option – 6mins	First Route Option – Y	First Route Option – Y
Swanwick	7.79%	First Route Option – 27mins Second Route Option – 20mins Third Route Option – 18mins	First Route Option – N, query why no one is routing this way Second Route Option – Y Third Route Option - N, this should not route via the bypass.	First Route Option – Y, 12mins variance Second Route Option – Y, 10mins variance. Third Route Option – N, 27mins journey time, 17mins variance.
Winchester	8.56%	First Route Option – 48mins Second Route Option – 45mins Third Route Option – 44mins	First Route Option – N, query why no one is routing this way Second Route Option – Y Third Route Option - N, this should not route via the bypass.	First Route Option – N, 53mins journey time, 25mins variance Second Route Option – N, 50mins journey time, 30mins variance Third Route Option – N, 55mins journey time, 30mins variance.

Regarding the non-employment distribution, a gravity model has been used, with a 20-minute catchment area proposed. 2011 Census data has been used to inform the population of destinations, to input into the gravity mode.

A similar review approach has been taken to the employment trip distribution. Data has been reviewed for those destinations where the proportion of car trips is nearing or over 5% only, but it is noted that all locations do need to be considered by the applicant. That is, the Applicant should reconsider the point highlighted in red in the below table and further destinations in Appendix O of the TA.

DESTINATION	PROPORTION BY CAR (100%)	PEAK JOURNEY TIME	IS THE ROUTING CORRECT (Y/N)	IS THE PEAK JOURNEY TIME CORRECT (Y/N)*
Fareham	21.15%	First Route Option – 13mins Second Route Option – 13mins	First Route Option – Y Second Route Option – Y	First Route Option – Y, 6mins variance Second Route Option – N, 11mins journey time, 7mins variance.
Stubbington	12.33%	First Route Option – 6mins	First Route Option – Y	First Route Option – Y

Assessment Years

The assessment years are considered appropriate.

Traffic Growth and Committed Development

The TEMPRO study area consisting of Gosport 001 MSOA and Fareham 013 MSOA is acceptable given the application site is split across these two zones. The applicants proposed method for upscaling traffic growth via an adjusted TEMPRO rate is considered acceptable and accurately reflected in the TA, traffic flow diagrams and junction modelling.

The proposed committed developments included within the TA assessment are acceptable. Furthermore, traffic forecast to be generated by the live application 'Land South of Longfield Avenue, Fareham' (P/20/0646/OA) is included in a sensitivity test.

However, Welborne Garden Village (P/17/0266/OA - up to 6,000 dwellings) committed development flows appear low. Traffic flow diagrams supplied in the Transport Assessment Addendum dated March 2019 prepared by WSP in support of application P/17/0266/OA forecasts a significant proportion of trips to exit the M27 J11 off-slip and travel via the A27 Gosport Road. Whilst the flow diagrams do not continue to the A27/ Gosport Road/ Quay Street junction and hence does not indicate the volume of trips routing via Newgate Lane, a total of 628 development vehicle trips travel southbound on the A27 Gosport Road in the AM peak and 427 vehicle trips in the PM peak. In comparison to the fewer than five vehicles travelling via Newgate Lane East, the routing is suggesting almost all trips are dispersed via alternate routes which is not considered realistic. The applicant should confirm how the committed development trips associated with Welborne Garden Village have been distributed from the A27 Gosport Road. This further information is required to ensure any additional trips associated with this development are accounted for in the site access junction modelling and off-site highway modelling.

Junction Capacity Testing

The following junctions are proposed to be included in the study area. Detailed junction capacity modelling has been carried out for these junctions:

- Newgate Lane East/ Newgate Lane/ Site Access roundabout (uncontrolled crossing);
- Newgate Lane East/ Newgate Lane/ Site Access roundabout (Toucan crossing);
- Peel Common roundabout;
- Newgate Lane/ HMS Collingwood access;
- Newgate Lane/ Speedfields Park roundabout
- Newgate Lane/ Longfield Avenue roundabout.

The study area for detailed junction capacity modelling will be confirmed following agreement of trip distribution and assignment.

The submitted TA does not include any details on the process for calibration or validation of the baseline junction models. Typically, this process would be undertaken using queue length surveys in order to ensure that the results of the baseline modelling reflect that of the observed transport conditions. Whilst queue length data is provided in Appendix G of the TA, no comparison against the baseline modelling is provided as a validation exercise.

The applicant should compare queue length data with the baseline models where appropriate to ensure the base models are validated and, if necessary, calibrated to observed conditions.

The assessment scenarios set out in paragraph 6.7.2 to the TA are acceptable. It is agreed that the 2021 baseline year is assessed using DS1 traffic flows (assuming no Stubbington Bypass), whilst the remaining scenarios are assessed using DS2 adjusted traffic flows as Stubbington Bypass is expected to be completed in 2022, ahead of occupation of the development should it come forward.

For each junction assessed, the model set up and inputs have been reviewed and the following comments can be made.

- Old Newgate Lane/ Newgate Lane East existing Junction Operation
 - No junction geometry drawings have been submitted and should be provided, including the width/length dimensions of the right turn

storage pocket. This must be supplied by the applicant in order to confirm the geometries applied within the junction modelling.

- Validate and, if necessary, calibrate the model using queue length data.
- It is noted from on-site observations that the existing junction layout operates satisfactorily. This junction was the subject of detailed VISSIM modelling assessment as part of the assessment of the appeal schemes west of Newgate Lane (P/18/1118/OA and P/19/0460/OA) and operated with a delay of less than 50 seconds per vehicle on the old Newgate Lane arm in the AM peak of the 2024 future year assessed under that application. As such, while further information is required to accurately review the modelling submitted under this application, it is expected the TA overestimates operational issues with the existing layout in the 2028 future year.

It should be noted that paragraph 4.4.33 of the TA is incorrect. The Local Highway Authority did not agree that the traffic impacts at the junction would be acceptable for the indicative arrow right turn arrangement. Paragraph 6.28 of Proof of Evidence of Nick Gammer in Respect of Highways and Transportation is copied below.

As set out above, currently, north and south bound traffic on Newgate Lane through this junction experiences free flow conditions. The introduction of additional queue lengths of over 100m and average per vehicle delay of over c.11 seconds for northbound traffic in the AM peak on the newly constructed and vital infrastructure of Newgate Lane East is unacceptable and represent a severe impact on the highway network under paragraph 109 of NPPF.

- Proposed Newgate Lane East/ Newgate Lane/ Site Access roundabout (uncontrolled crossing)
 - Updated modelling will be required following any design amendments.
 - The proposed Newgate Lane site access uses a 'direct' approach to inputting origin and destination flows, whereas for off-site unsignalised junction models a 'one hour' profile, including a 15-minute load time before and after the peak hour. The 'one hour' flow profile should be used for all models.
 - An even profile distribution of proposed development traffic flows has been included in the junction model for the peak hours. This assumes a flat distribution profile over the peak hour. The applicant should use the 'one hour' profile, with loading for the 15 minutes before and after the junction modelling period for a robust assessment.

- HGV Percentages significantly vary across time periods, with Newgate Lane West having a 20% and 33% HGV proportion. The applicant should confirm that HGV percentages are derived from traffic survey data in light of the reported HGV proportions on certain arms of the junction.
 - It is noted that the junction modelling includes a warning that the Newgate Lane East (South) includes an effective flare length of 52.1m, with a warning message noting that the effective flare length is over 30m which is outside of the normal range and capacities should be treated with increasing caution. The geometry shown on drawing ITB10353-GA-105, includes an effective flare length of 18.91m and therefore given that the RFC for this arm in the AM is 0.84 this requires careful consideration as reducing the flare will result in a greater RFC and could lead to capacity issues. The applicant should therefore clarify the discrepancy between model geometry drawings and the effective flare length coded in the junction model and amend the junction modelling if required.
- Peel Common Roundabout
 - The model provided does not reflect the current scheme being constructed at Peel Common roundabout. An updated model can be provided by Hampshire County Council.
 - It is noted that some of the circulatory queuing is longer than the available storage area. These queues should be constrained to the storage area to prevent blocking back across the exits from the roundabout.
- Newgate Lane / HMS Collingwood Access / Speedfields Park
 - Stage 2 is missing from the stage sequence. When demanded it will appear for at least the phase C (right turn to HMS Collingwood) minimum green time. If a demand exists for phase E (Toucan across southbound lanes) the controller will move to stage 3 after the phase C minimum green time with the phase delay time applied.
 - In the AM peak it is noted that the Newgate Lane northbound flows have been locked per lane. There is no reasoning given for this.
 - The PM peak traffic flow on Newgate Lane southbound (J2 arm 1) has been split evenly across the 2 lanes. To reflect the on-street behaviour resulting from the downstream merge the southbound flows should be weighted with 60% in the nearside lane and 40% in the offside lane.

- Validate and, if necessary, calibrate the model using queue length data.
- Newgate Lane / Longfield Avenue Roundabout
 - No junction geometry drawings have been provided. This must be supplied by the applicant in order to confirm the geometries applied within the junction modelling.
 - Validate and, if necessary, calibrate the model using queue length data.
- Brookers Lane Toucan Crossing
 - Establishing the demand level at the crossing will be essential to understand the traffic impact on Newgate Lane. Correction of the pedestrian and cycle distribution is required to ascertain a reasonable estimate of the future demand.
 - The modelled cycle time in the AM peak is 90 seconds which indicates 40 demands across the peak hour. In the PM peak (1600-1700) the cycle time is 70 seconds which indicates 51 demands across that hour. Accurately predicting the demand level particularly in the AM peak will be vital. For example, should the demand actually be 50 appearances per hour in the AM peak the shorter 70 second cycle time has a significant impact on the Degree of Saturation on Newgate Lane northbound. At the modelled 90 sec cycle time this approach is just within capacity in 2028 AM 'with development traffic' (1.0% PRC) but goes over capacity in 2037 'with development traffic' (-3.8%). Reducing the cycle time due to increased demand pushes Newgate Lane northbound further over capacity in the AM peaks.
 - In the Linsig model the Stage 1 to 2 intergreen should be increased from 5 to 6 seconds to reflect the forced stage changes at the standalone crossing due to the lack of gaps in the peak hour flows along Newgate Lane.

Wider Highway Network Impact

Comment on the impact of the proposed development at the above locations will be made following agreement of trip distribution, assignment and resolution of the above modelling comments.

The study area for detailed junction capacity modelling will be confirmed following agreement of trip distribution and assignment.

It should also be noted that no consideration has been given to disruption caused due to construction of the proposed site access roundabout, including of diversion of traffic to unsuitable routes, which is considered an additional unnecessary impact by the Local Highway Authority.

Furthermore, the increase in traffic emissions due to the introduction of the new site access roundabout, causing all traffic to slow and then accelerate, do not appear to have been considered. Assessment of this impact is required.

These factors, relating to both the impact of roundabout construction on the wider network and also the longer-term carbon related impacts of the additional traffic and infrastructure will need to be considered further.

Previous Local Plan Assessment

The earlier version of the local plan referred to in the TA, including the proposed development site within allocation HA2, was revised before going to examination. As such, the current local plan proposals being tested at the currently underway examination do not include this site. Also, the Local Highway Authority objected to the HA2 allocation in the iteration of the local plan referenced in the TA as set out in the Background section above.

Furthermore, any threshold agreed with the County Council for the purpose of the Local Plan testing to identify 'severe' impacts applies to all proposed local plan sites on aggregate and not to individual sites. For a single site in isolation, a delay of less than the threshold stated for all sites on aggregate could be considered severe.

Recommendation

On the basis of the information submitted in support of the planning application, the Local Highway Authority would recommend that the Local Planning Authority refuse the application due to the following reasons:

1. The applicant has failed to demonstrate the development would not result in an unacceptable impact on highway operation and safety. On this basis the proposed development would be contrary to NPPF Paragraph 111 in that it would result in a severe impact on the road network.

Reason: In the interest of Highway Safety and Operation.

2. The applicant has failed to demonstrate that the development can be accommodated in a manner that would not cause increased danger and inconvenience to highway users, including those travelling by sustainable modes. On this basis the proposed development would be contrary to NPPF Paragraph 110.

Reason: In the interest of Highway Safety and Accessibility.

It may be possible that the reasons set out above, could be overcome following receipt of additional information as follows:

- A WCHAR review of routes to the catchment schools and amenities within Stubbington.
- Consideration of improvements for cyclists on Wych Road, between Tukes Avenue and the Henry Cort Way.
- Consideration of Redlands Lane cycle improvements, between the northern end of Henry Cort Way and The Gillies.
- Agreement of a contribution of 16,000 towards the provision of Real Time Information (RTI) at Tukes Avenue bus stops.
- A sensitivity junction model test for the proposed site access in the 2037 future year scenario, uplifted to the recorded ATC flows.
- Revised traffic flow diagrams to include the bypass straight ahead lane at the Newgate Lane/ Speedfield business park roundabout.
- Extended traffic flow diagrams to include the Gosport Road/ Palmerston Drive junction and associated Newgate Lane flyover.
- Consideration of PIA mitigation at Newgate Lane/ A32 Gosport Road interchange.
- Address comments relating to the design of the proposed pedestrian and cycle accesses.
- Address comments relating to the proposed southern emergency access link.
- Consideration of lighting of the Brookers Lane/ Woodcot Lane pedestrian and cycle link.
- Consideration of cycle improvements on the route to the catchment schools of Wallisdean Infant and Junior and Fareham Secondary Academy at, and north of, Longfield Avenue.
- Agreement of a contribution of £42,000 towards the producing and delivering School Travel Plans for the catchment schools.
- Address comments relating to the design of the proposed roundabout site access.
- Inclusion of the catchment schools in the pedestrian and cycle demand forecasts.
- Amend the routing and journey times for the destinations noted and resubmit a revised traffic distribution.
- Confirm the distribution of Welborne Garden Village committed development trips from the A27 Gosport Road.
- Compare queue length data with the baseline models to ensure the base models are validated to observed conditions. Calibrate baseline models if necessary.
- Geometry drawings for all off-site highway junction models.
- Updated modelling using a one-hour profile rather than direct flow input for the proposed site access.
- Confirm that HGV percentages are derived from traffic survey data.

- Clarify the discrepancy between the 18.91m effective flare length shown on drawing ITB10353-GA-105 and the 52.1m coded in the site access junction model.
- Provide modelling to reflect the current scheme being constructed at Peel Common roundabout.
- Address the modelling comments relating to Newgate Lane/ HMS Collingwood Access/ Speedfields Park junction.
- Address the modelling comments relating to Brookers Lane Toucan Crossing.

The County Council as Local Highway Authority reserve the position to provide an updated recommendation following review of additional details, should these be provided.

I trust that the above is clear, but I would ask you not to hesitate to contact Nick Gammer should you wish to discuss anything further.

Appendix B: Countryside and Rights of Way comments

It is noted that the Walking, Cycling and Horse-riding Assessment and Review does not include horse riding which, while not relevant to the development proposed, is relevant to the scope of the TA. In particular FP 74 and FP 68 currently have permissive equestrian access. The TA does not assess the current use of Tanners Lane/FP by cyclists.

The Countryside Service would support any proposals to add to the rights of FP 68 which is likely to provide a better routes to local amenities, strategic greenspace and access to wider countryside or long distance routes (including the Meon Valley, Titchfield Canal and Titchfield Haven NNR) than FP 74 (as the route now crosses/truncated by the Stubbington bypass).