GDL - 3 - P

Highways Proof of Evidence

APP/C1760/W/24/3354052

David Stoddart

Halterworth Lane, Romsey, Hampshire

Appellant: Gladman Developments Ltd

CONTENTS

1 INTRODUCTION

1.1 Witness Statement

1.1.1 My name is David Stoddart. I hold the position of Associate Director at Prime Transport Planning (Prime), an independent specialist transport planning consultancy. Our clients include private developers, major national organisations and local authorities.

1.1.2 I hold a BA (Hons) in Geography from the University of Manchester. I am a Chartered Member of the Chartered Institute of Logistics and Transport, a Member of The Chartered Institution of Highways & Transportation and a member of the Transport Planning Society. I have practiced in the field of Transport Planning and Engineering since 2005, working across the development sectors on a variety of projects from small scale developments to sustainable urban extensions and strategic highway modelling.

1.1.3 With respect to the proposed development on land off Halterworth Lane, Romsey, I have undertaken multiple visits to the site and the surrounding highway network since my first visit in 2021. My site visits have encompassed the network peak hours and the drop-off and pick-up times of the local primary school.

1.1.4 The evidence which I have prepared and provide for this Appeal is true and has been prepared and given in accordance with the guidance of my professional institutions and industry best-practice. I recognise that whilst my services have been employed by the Appellant, my duty is to assist the Inspector in reaching their decision by being independent and objective. I can confirm that the opinions expressed are my true and professional opinions.

1.2 Scope

1.2.1 The remainder of my Proof is structured as follows:

- Section 2 provides a summary of the history to the planning application but in particular the background relating to the traffic and transportation input to the planning application;
- Section 3 summarises the Transport Assessment (TA) and the Interim Residential Travel Plan (TP), both of which formed Appendices 6.1 and 6.2 respectively to the Traffic and Transport chapter of the Environmental Statement (ES) (CD 1.23);
- Section 4 provides a summary of the post-submission discussions with Highway Officers at Hampshire County Council's (HCC) Highway Development Planning department, along with HCC's Rights of Way and Countryside Officer. This includes a summary of Transport Technical Note 1 (TTN1) (CD 8.11) and the improvements offered as part of the proposed development;
- Section 5 provides my response to third party comments related to highways matters; and
- Section 6 provides a summary and conclusion to my Proof of Evidence.

1.2.2 The aim of my Proof is to provide the Inspector with an overview of the evidence submitted in relation to highways matters, and detail how such matters are now agreed with HCC, such that previous reasons for refusal are no longer advanced by the Local Planning Authority.

2 PLANNING APPLICATION

2.1 Original Submission Documents

2.1.1 The planning application submitted by the Appellant was validated by Test Valley Borough Council (TVBC) in January 2024 and assigned the reference 24/00174/OUTS.

2.1.2 Prime prepared a Traffic and Transport chapter (Chapter 6) for the supporting Environmental Statement (ES) (CD 1.23). A Transport Assessment (TA) and Travel Plan (TP) formed Appendices 6.1 and 6.2 respectively. The documents were prepared following pre-application discussions between Prime and HCC in its capacity as Local Highway Authority (LHA).

2.2 Highways Related Reasons for Refusal

2.2.1 Planning permission was refused in April 2024 for a number of reasons which are addressed in the Planning evidence, but two related to highways/transport matters. Reason for refusal (RfR) no. 4 related to highways as follows:

> *The proposal would give rise to an adverse effect on the function, safety and character of the local highway network. There is a lack of clarity in relation to assessment and amendments requested by the Highway Authority which includes vehicle access proposals, suitable sustainable modes improvements, clarity around school parking proposals, confirmation of committed development assessed, Cycle Level of Service assessment of A27/Botley Road/Premier Way roundabout, and amendments to Travel Plan. The proposal would therefore result in unnecessary additional burden being placed on existing highway provision and would create an adverse impact on the function, safety and character of and accessibility to the local highway network. The location would not be connected with existing and proposed pedestrian cycle and public transport links and would not minimise its impact on the highway and rights of way network. This would be to the overall detriment of the area and pedestrian, cycle or public transport users of the highway. No legal agreement has been secured to address the above requirements and the proposal is contrary to policy T1 of the Test Valley Borough Revised Local Plan (2016), and the Infrastructure and Developer Contributions Supplementary Planning Document.*

2.2.2 RfR no. 5 also relates to highways in the context of public rights of way (PRoW) as follows:

> *In the absence of an agreed specification of work and / or a suitable financial contribution towards improving the useability of this route to service future residents, the proposed development fails to provide sufficient rights of way provision required to serve the needs of the future population and places an unnecessary unjustified burden*

on the public right of way network. The proposal is considered to be contrary to Test Valley Borough Local Plan - Policy T1 and the NPPF para 104.

2.2.3 Through further discussions with TVBC and clarification provided at the Case Management Conference, it has been confirmed that the above route in question relates to PRoW footpath 198/15/1 (also referred to by HCC as FP15) that runs through the northern part of the site from Halterworth Lane opposite Kennett Close.

2.3 HCC Consultation

2.3.1 TVBC consulted HCC as part of the planning application. HCC provided a consultation response dated 25th March 2024 (CD 3.19). The recommendation in HCC's response was as follows:

- *Further information is required prior to the highway authority being in a position to provide a recommendation. This is as follows:*
- *Amendments to vehicle access proposals*
- *Suitable sustainable modes improvements*
- *Clarity around school parking proposals*
- *Confirmation of committed development assessed*
- *CLoS assessment of A27/Botley Road/Premier Way roundabout*
- *Amendments to Travel Plan.*

2.3.2 Prime sought further clarification from HCC regarding the above points, particularly the second point relating to sustainable travel improvements.

2.3.3 Virtual meetings were held with HCC on 31st July and 4th December 2024. The above points were discussed and a clearer prescription of HCC's expectations for sustainable travel improvements was provided.

2.3.4 TTN1 (CD 8.11) and an updated TP provided a response to HCC's comments in in advance of presenting technical drawings for a walking and cycling improvement scheme in line with the aspirations of the Test Valley (south) Local Cycling and Walking Infrastructure Plan (LCWIP). RfR 5 relating to PRoW was also addressed in TTN1.

3 SUMMARY OF SUPPORTING DOCUMENTS

3.1 Transport Assessment

Scope

3.1.1 The TA submitted at the time of the planning application was produced in line with industry best practice and guidance. The scope of the assessment was agreed with HCC as part of preapplication discussions in late 2023. Key aspects of the assessment were agreed, including:

- Details of the accessibility by sustainable modes of transport;
- Extent of the accident study area;
- Extent of the traffic surveys for use in junction capacity assessment and proposed site access design;
- Confirmation of the need for a Stage 1 Road Safety Audit (RSA) of the proposed site access arrangement;
- Principle of the proposed access arrangement;
- Principle of a school drop-off/pick-up area;
- Trip rates;
- Traffic distribution;
- Traffic growth;
- Committed developments;
- Extent of junction capacity assessment; and
- Requirement for a Framework Travel Plan.

Policy and Guidance

3.1.2 The TA was prepared in line with national and local policy and guidance. At the time of the assessment, *National Planning Policy Framework* (NPPF) December 2023 was the current national policy. This has however been superseded by the December 2024 update. The changes to NPPF from a highways and sustainable travel perspective are relatively minor and do not influence the conclusions of the TA with the exception of updated paragraph numbers. Of primary importance are the following paragraphs with the 2023 superseded paragraphs provided in brackets:

- Para 110 (109) in terms of significant development being focused on locations which are or can be made sustainable by both limiting the need to travel and offering a genuine choice of transport modes;
- Para 115 (114) by ensuring that sustainable modes are prioritised, safe and suitable access can be achieved for all users and significant impacts from development can be cost-effectively mitigated to an acceptable degree;

- Para 116 (115) in relation to the determination of planning applications in that they should only be refused on highways grounds if there would be an *'unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios;' and*
- Para 117 (116) in terms of giving priority to pedestrians and cyclists, facilitating access to public transport, addressing the needs of people with disabilities and reduced mobility, minimising scope for conflict, allowing the efficient delivery of goods and access by service and emergency vehicles and facilitating the charging of plug-in and ultra-low emission vehicles.

3.1.3 Whilst the inclusion of reference to a *'vision-led approach'* in para 115 and *'all reasonable future scenarios'* in para 116 are welcomed, it is considered that the targets of the TP and the measures proposed to achieve them, alongside the active travel improvements agreed with HCC, are in line with such an approach. It is also considered that the traffic forecasting undertaken presents a reasonable, albeit somewhat worst-case, scenario on which to assess the cumulative impact of the proposed development, in line with Institute of Environmental Management and Assessment (IEMA) guidelines.

3.1.4 Also of considerable importance is Policy T1 'Managing Movement' of the Test Valley Borough Revised Local Plan (2016). This policy requires developments to be: connected with pedestrian, cycle and public transport links to key destinations; include measures to minimise their impact on highway and PRoW networks, and pedestrian, cycle and public transport users; have safe access and are accessible for all users; do not have adverse impacts on the local, strategic or PRoW networks; and support and promote the use of sustainable travel.

3.1.5 Other notable policies and guidance are Policy T2 'Parking Standards' and Objective 13 'Transport' of the Revised Local Plan, Guiding Principles 1 and 2 of the Hampshire Local Transport Plan 4 (LTP4) along with Policies C1 to C9, Manual for Streets (MfS) and HCC's Technical Guidance Notes.

Existing Situation

3.1.6 A qualitative and quantitative review of the highway and PRoW networks in the vicinity of the Appeal site was provided. This included observations from several site visits which encompassed the drop-off and pick-up times of Halterworth Primary school.

Baseline Traffic Data

3.1.7 Details of the traffic surveys undertaken to establish the baseline conditions were presented. These surveys included the following:

- Classified turning counts and queue lengths surveys at 8 junctions in the study area;
- A level crossing survey at the level crossing on Halterworth Lane;

- Automatic traffic counter surveys on 5 links (roads) in the study area to validate the turning counts with two also used to derive 85th percentile speeds for use in the proposed site access design; and
- A parking beat survey on Halterworth Lane between the junctions with Saxon Way and Botley Road as well as Saxon Road between Halterworth Lane and Kennett Road, and Benedict Close from Halterworth Lane to its first northern cul-de-sac, to consider the extent of on-street parking in the vicinity of Halterworth Primary School.

3.1.8 All traffic surveys were undertaken by an independent traffic survey and data collection specialist in line with Department for Transport (DfT) TAG Unit M1.2 guidance. The surveys were undertaken in November 2023 which was a neutral period in order to provide a representative quantification of typical traffic conditions, and are less than three years old meaning that they are still valid for assessment purposes (three years is the typical threshold).

3.1.9 A data validation exercise was undertaken that showed that the turning count data aligned with the ATC based data within reasonable, industry recognised tolerances.

3.1.10 Average traffic speeds on Halterworth Lane in the vicinity of the proposed site accesses were below the 30mph speed limit of the road. The 85th percentile speeds, used in the proposed site access design, were below 30mph at the southern section of site frontage and slightly above it at the northern section of site frontage.

3.1.11 The parking beat survey was undertaken between 08:30 and 09:30 and between 14:30 to 16:00 to cover the school start time of 08:55 and the staggered end time between 15:25 and 15:35. The surveyor noted that there was space for up to 33 cars to park legally on Halterworth Lane in the vicinity of the study area. All spaces on Halterworth Lane were occupied in the AM period for around 25-minutes and for around 35-minutes in the PM period. Cars were also parked on Saxon Way and Benedict Close. It was noted that some cars were parked illegally on Halterworth Lane in both periods.

3.1.12 It is important to note from the survey results that local residents and potentially staff and visitors to the school also park on Halterworth Lane, it is not just school traffic that parks there. This is evident from parked cars being present well in advance and following the school opening and closing times.

Development Proposals

3.1.13 Details of the development proposals were presented in the TA with a focus on the access strategy. Two simple priority controlled 'T' junctions are proposed, these being the most common forms of junctions to serve residential developments and the most common forms of junction locally. One access is proposed at the northern section of site frontage to the north of Saxon Way, and the other is proposed at the southern section of site frontage north of Benedict Close.

3.1.14 Visibility splays have been designed based on the stopping sight distance recommended by MfS and HCC's Technical Guidance Note 3 in accordance with the recorded 85th percentile speeds at each proposed access location.

3.1.15 It is proposed that the two site accesses will be connected internally as shown illustratively on the Development Framework Plan (DFP) (CD 6.2).

3.1.16 Dropped kerbs and tactile paving will be provided across both proposed site accesses and Halterworth Lane, demarcating safe and convenience locations for pedestrians to cross the roads, including people with visual impairments and wheelchair and buggy users.

3.1.17 The proposed access was subject to an independent Stage 1 RSA as detailed below.

3.1.18 Swept path analysis was undertaken using industry standard software to demonstrate that both site accesses were suitable for occasional large vehicle use, particularly refuse collection vehicles.

3.1.19 It was explained that, whilst the internal layout would be subject to a separate Reserved Matters application, it will be designed based on MfS principles with a 20mph design speed. It was also acknowledged that parking provision would be provided in line with the local standards at the time of the eventual Reserved Matters application. Provision for electric vehicle charging will meet the requirement of Approved Document S of the British Standards.

3.1.20 It was acknowledged that the proposed southern access would be located on a section of Halterworth Lane that is subject to single yellow line parking restrictions so the proposed access should not displace any legal on-street parking. It was suggested that double yellow lines could be provided to protect the junction, and the offer was made by the Appellant to fund any modifications to the existing traffic regulation order (TRO).

3.1.21 The Appellant understands that parking associated with Halterworth Primary School occurs on the section of Halterworth Lane in the vicinity of the proposed southern access and recognises that this can cause nuisance to local residents and other road users. It is not expected that the proposed development will exacerbate this level of parking as the proposed dwellings will be within easy walking distance of the primary school. It is observed that school parking does not extend as far north as the proposed northern site access.

3.1.22 The Appellant has however offered to provide parking within the site for school trips. Although final details can of course be designed at the Reserved Matters stage/by compliance with a planning condition, a semi-formal car park was originally suggested during preapplication discussions, however, further consideration of on-site constraints meant that the area suggested would be needed for drainage, as shown in the DFP (CD 6.2), therefore a layby parking arrangement on the main internal spine road was suggested which would also be convenient for visitors to the proposed dwellings. This matter was discussed further with HCC post-submission of the planning application as detailed in the following section.

3.1.23 The development proposals align with TVBC Objective 13 and policies T1 and T2, along with the two Guiding Principles and Policies C1, C3, C5, C6 and C7 of HCC's LTP4. The design of the access road will conform to the guidance of MfS and HCC's Technical Guidance Note 3.

3.1.24 The design principles help the Site to conform to NPPF guidance including paragraph 115 in terms of creating *'safe and suitable access'*, and paragraph 117 in giving priority to pedestrian and cycle movements, and creating safe and attractive places which minimise conflicts between traffic and cyclists or pedestrians and considers the *'needs of people with disabilities and reduced mobility'*.

Access by Sustainable Modes

3.1.25 Access to the proposed development has been considered with reference to guidance from the Chartered Institution of Highways and Transportation (CIHT) and the DfT. This includes a review of existing infrastructure for pedestrians, cyclists and public transport users. A Walking, Cycling and Horse-Riding Assessment Report (WCHAR) was also undertaken at the request of HCC.

3.1.26 The local area benefits from established street-lit footways that run alongside roads predominantly subject to a 30mph speed limit, supplemented by convenient cut-throughs between residential estates along with more scenic PRoW.

3.1.27 Several amenities, schools and places of employment are within CIHT recognised walking distances including Halterworth Primary School, two convenience stores (one with a Post Office), a nature reserve, a park, a church, a public house, The Mountbatten School and an industrial estate (Abbey Park). The edge of Romsey town centre is also within a reasonable walking distance.

3.1.28 The site lies adjacent to Botley Road which forms part of National Cycle Route (NCR) 24 and is partially segregated in places. NCR 24 connects to NCR 23 that runs to Southampton and NCR 246 that connects to Andover and Kintbury.

3.1.29 In addition to the amenities accessible on foot, cycling provides further connectivity with many more amenities, schools and places of employment, including Romsey Hospital, Romsey town centre, Romsey train station, several industrial estates and business parks, plus North Baddesley and Chandlers Ford.

3.1.30 A pair of bus stops are located on Halterworth Lane within a convenient walking distance of the site and provide access to the number 35 service that runs between Romsey and Braishfield though it is recognised that such services are limited to one per day in each direction and the stops themselves have limited infrastructure.

3.1.31 More frequent bus services are available from the stops on Botley Road close to the junction with Halterworth Lane, around a 7-minute walk from the site. These include the number 4 service between Romsey and Southampton city centre with two services per hour Monday to Saturday and one per

hour on Sundays, and the number 5 service between Romsey and Boyatt Wood (Eastleigh) with one service per hour Monday to Friday and one every two hours on Saturdays.

3.1.32 The Appellant's offer to upgrade the pair of bus stops on Halterworth Lane to include raised boarding areas, shelter, seating and timetable information has been welcomed and accepted by HCC as has the offer to provide shelters at the pair of bus stops on Botley Road opposite and adjacent Halterworth Lane.

3.1.33 National rail services are available from Romsey train station which is accessible for some people on foot, and others via bicycle or bus. The station provides services to Chandlers Ford (7 minutes), Southampton Central (11 minutes), Eastleigh (13 minutes), Southampton Airport Parkway (17 minutes), Salisbury (18 minutes), Portsmouth Harbour (59 minutes) and Bath Spa (73 minutes). Three services per hour run to Southampton Central.

3.1.34 The accessibility of the site aligns with the NPPF vision-led approach along with LTP4's Guiding Principles and policies C1, C3, C5, C6 and C7, and TVBC's Objective 13 and Policy T1.

Traffic Forecasting

3.1.35 The traffic forecasting methodology was agreed with HCC at the preapplication stage.

3.1.36 The validated traffic survey data was growthed to a forecast year of 2028 using the DfT's TEMPro software and its National Road Traffic Projections, this being an industry standard methodology. The planning assumptions within TEMPro were manually adjusted to reduce the scope for the double counting of traffic associated with committed developments.

3.1.37 Forecast traffic flows from six developments were explicitly included in the assessment as committed developments. Normally committed developments would be those with planning permission or local plan allocations, but as the assessment informed an Environmental Impact Assessment (EIA), applications pending planning approval were also included. Section 7.3 of the TA lists these committed developments, noting that the large scale Whitenap application (TVBC ref. 22/01213/OUTS) was also included. The list has been checked, and at the time of writing this Proof, it remains valid.

3.1.38 Trip rates were calculated using the TRICS database, again, this is an industry standard traffic forecasting tool. A sample of sites with similar locational characteristics was collated and the trip rates used in the assessment were the same as those agreed with HCC at the preapplication stage. The trip rates suggest that the proposed development will generate in the region of 140 two-way (arrival and departure) trips in the AM peak hour and 136 in the PM peak hour, these being equivalent to just over two new trips per minute at the site accesses before dissipating across the local highway network.

3.1.39 The trip rates should be considered to be robust as they have not been adjusted to take into account the affordable housing element nor any reduction associated with any future reduction in car travel, such as from increased levels of working from home, or any potential increased use of sustainable modes of transport.

3.1.40 The TRICS trip rates have been modified by census method of travel to work (MTW) data to estimate the potential numbers of trips made by all modes, though the numbers of active travel trips are likely to be higher given the improvements offered as discussed in the following section.

3.1.41 The development traffic has been distributed through the local highway network based on census MTW data for the local area, this being a commonly accepted robust methodology. The distribution was agreed with HCC during preapplication discussions.

3.1.42 Five assessment scenarios were derived for EIA purposes, with the main three for TA purposes being the 2023 Baseline (surveyed traffic flows), the 2028 Without Development (2023 Baseline plus committed developments plus background traffic growth) and the 2028 With Development (2028 Without Development plus development traffic). The 2023 Baseline flows were primarily used to calibrate models of key junctions in the study area, while the 2028 flows were used to assess the cumulative impact of background traffic growth, traffic from committed developments and development traffic. The models not only provide an estimate of how the study area junctions will operate in the future, but also allow the impact of the proposed development to be quantified.

Traffic Impact Assessment

3.1.43 Table 8.1 of the TA provides and absolute and percentage impact comparison between the 2028 Without Development and the 2028 With Development scenarios at the eight study area junctions and the Halterworth Lane level crossing. The greatest impact of the development in absolute terms is forecast to be at the Botley Road/Halterworth Lane junction where 94 and 92 two-way trips in the respective AM and PM peaks are forecast, with this being equivalent to three trips every two minutes. The only other offsite junction in the study area where more than one trip per minute (60 trips) are forecast is the A27/Botley Road/Premier Way roundabout where the development is forecast to add 76 and 73 trips in the respective AM and PM peak hours. The impact at the Halterworth Lane level crossing is forecast to be 46 and 49 two-way trips in the respective AM and PM peak hours.

3.1.44 Capacity assessments using specialist industry standard software have been undertaken at the two proposed site accesses and all eight offsite junctions. As all junctions are/will be priority or roundabout controlled, Junctions 10 software has been used, with this being the most commonly used and accepted software for such assessments. The key output when reviewing Junctions 10 results is the ratio of flow to capacity (RFC). An RFC of 0.85 (85%) is the practical capacity threshold above which capacity problems may begin to occur, while an RFC of 1.00 (100%) is the theoretical capacity threshold. Should an arm have an RFC that is greater than 1.00, it would be considered to be over capacity, but it is important to note that increases to or above 1.00 should not necessarily be

considered to be a *'severe'* impact as other factors need to be considered such as queue lengths, duration of RFC and level of increase.

3.1.45 The capacity assessment results for the two proposed site accesses are provided in Tables 8.2 and 8.3 of the TA. Both junctions are forecast to operate with a considerable level of spare capacity and are therefore appropriate to serve the proposed development.

3.1.46 The capacity assessment results for the eight offsite junctions are provided in Table 8.4 to 8.14 of the TA. The development is shown to have a negligible impact on the results, and notably less than the impact of the background traffic growth and traffic from the committed developments.

3.1.47 Mitigation has been offered by the Whitenap development at the A27/Botley Road/Premier Way roundabout. At the time of the assessment, the improvements consisted of flare and merge lengthening on the approach to and exit from the roundabout and the provision of a ghost island right turn at the Highwood Lane junction. I have reviewed the improvements and consider them to be appropriate, and as shown in Table 8.11, they offer a notable capacity improvement. Following the assessment, additional improvements have been offered for pedestrians and cyclist at the junction which should offer a wider benefit. Given the comparatively low increase in RFC as a result of the proposed development, the improvements are not necessary to facilitate it, which is demonstrated by the 2028 Future Baseline plus Development results in Table 8.11 of the TA.

3.1.48 An independent survey of the level crossing on Halterworth Lane was undertaken. The survey showed that the barrier was down three times during the AM peak hour for a combined total of 89 seconds. The longest period which the barrier was down lasted 44 seconds during which a queue of 22 vehicles formed in the northbound direction and 6 vehicles formed in the southbound direction. Just 61 northbound and 56 southbound trips from both the committed developments and proposed development are forecast in the AM peak hour. As these figures are equivalent to one trip per minute on average, the queue lengths would likely increase by just one vehicle in each direction.

3.1.49 In the PM peak hour, the barrier was down just twice, for a combined period of 41 seconds. During this time, queues of 8 and 5 vehicles formed in the northbound and southbound directions. Trips from the committed development and the proposed development are forecast to total 63 trips northbound and 43 trips southbound. Again, this average of one trip per minute would be forecast to lengthen the queues by just one vehicle.

3.1.50 It was concluded that the cumulative impact of the proposed development will be in line with TVBC Policy T1 and would not result in an *'unacceptable impact on highway safety'* nor have a *'severe'* (the test within the Framework) impact on the operation of the highway network in terms of safety and capacity. This is agreed with HCC.

Highway Safety

3.1.51 Section 9.1 of the TA provides a review of highway safety using collision data encompassing the local study area. The collision data was for the most recent five-year period available at the time of the assessment, covering the period from 1st December 2018 to 31st August 2023. The data showed that there had been 34 reported collisions in the study area during the five-year period. None of the accidents resulted in fatalities. The number of collisions per year (partial years excluded) varied from four to nine which I do not consider to be unusually high figures given the extent of the study area.

3.1.52 The collisions were also dissipated across the study area as shown in the plan in Appendix K of the TA which has the locations of the collisions plotted. No more than five collisions were reported at any of the study area junctions. The accidents occurring along stretches of roads in the study area were also dissipated and not confined to any singular locations.

3.1.53 It was noted that very few collisions occurred in the vicinity of the appeal site, with none occurring at the site frontage.

3.1.54 Section 9.2 presents a summary of the independent Stage 1 RSA and Designers' Response. The RSA, which was inclusive of a site visit, was undertaken by two qualified professionals in line with the *Design Manual for Roads and Bridges* document *GG119 Revision 2 – Road Safety Audit*. The full RSA is provided in Appendix L of the TA.

3.1.55 Only two 'problems' were identified by the RSA. The first was in relation to parked cars potentially interfering with junction intervisibility splays. It was recommended by the auditors that the parking situation on Halterworth Lane was investigated and amendments made to the design to ensure adequate intervisibility at both access junctions. To address this, the proposed access arrangement was revised to include a suggested amendment to the existing TRO at the southern access to convert the existing single yellow line to double yellow lines. It was also highlighted that the proposed parking for school trips internally to the site should assist with this issue.

3.1.56 The second 'problem' identified by the auditors was that it was felt that there would be excessive vehicular encroachment by larger vehicles into opposite lanes when navigating the site accesses. To address this, the proposed access arrangement was updated to provide corner tapers to better accommodate the swept paths of the larger vehicles.

3.1.57 HCC accepted the RSA, the Designers' Response and the subsequent drawing updates.

Summary and Conclusion

3.1.58 It was concluded that the proposed development would not result in an *'unacceptable impact on highway safety'* nor have a *'severe'* impact on the operation of the highway network in terms of safety and capacity. The impact is best described as negligible.

3.1.59 HCC agreed with the above subject to conditions and obligations that are detailed in the following section.

3.2 Travel Plan

3.2.1 An Interim Residential TP formed Appendix 6.2 of the ES (CD 1.23). The TP was prepared in line with national and local guidance as well as industry best-practice. It represents the start of the travel planning process which will continue to evolve as the development progresses and becomes occupied.

3.2.2 The TP outlines the Appellant's commitment to the promotion and encouragement of sustainable travel. As well as providing details of how the TP will be managed, monitored and reviewed, it sets targets for a reduction in single occupancy private car use and a proportionate increase in the use of sustainable modes of travel. In order to achieve these targets, a number of measures are suggested, as follows:

- Reducing the need to travel: including providing the infrastructure to work from home and the encouragement of home deliveries;
- Welcome packs: such packs will be issued to the first occupants of each new dwelling to provide them with information on the benefits of sustainable travel and how they can travel sustainably through the inclusion of walking, cycling and public transport maps and public transport timetables;
- Other methods of awareness raising and marketing: including personal travel planning, establishment of local forums potentially including use of social media to establish and maintain them;
- Measures to encourage walking: including promoting the health benefits of walking and promoting local walking routes;
- Measures to encourage cycling: including promoting the health benefits of cycling and promoting local walking routes and cycle storage facilities;
- Measures to encourage public transport: including promotion of routes and timetables;
- Measures to reduce single occupancy car trips: such as the promotion or formal and semi-formal liftsharing; and
- Measures to encourage low emission vehicle use: including the provision of electric vehicle charging facilities in accordance with Approved Document S of the Building Regulations.

3.2.3 Amendments to the TP have been made following feedback from HCC as detailed in the following section.

4 POST-SUBMISSION DISCUSSIONS WITH HCC

4.1 Highways Consultation Response and Discussions up to TTN1

4.1.1 HCC Highways' consultation response to the application was dated 25th March 2024 (CD 3.19). Further information was requested regarding the following:

- Amendments to vehicle access proposals;
- Suitable sustainable modes improvements;
- Clarity around school parking proposals;
- Confirmation of committed development assessed;
- CLoS assessment of A27/Botley Road/Premier Way roundabout; and
- Amendments to Travel Plan.

4.1.2 As there was insufficient time to clarify arrangements to address the above, highway safety, capacity and accessibility formed RfR 4.

4.1.3 Whilst I was satisfied that the majority of the items raised could be readily addressed, I felt that the sustainable improvements that were requested were somewhat ambiguous. Therefore, HCC Highways was contacted and this and the other matters were discussed in a Teams based meeting on 31st July 2024 with a follow up meeting on 4th December 2024.

4.1.4 During the first meeting I learnt of HCC's objective to deliver active travel improvements in line with the aspirations of the LCWIP. In line with national policy, LTP4 has solidified HCC's commitment to encourage a modal shift from private car use, putting active travel first. Not only will active travel help to reduce car borne trips, reducing the need for new infrastructure for motor vehicles, it will provide environmental benefits and encourage healthier lifestyles. This is an approach I agree with.

4.1.5 I was made aware that HCC had requested the Whitenap applicant to design a series of active travel improvements in line with the LCWIP, and it would be appropriate for the Appellant to do the same on sections of the LCWIP route in the vicinity of the site that Whitenap was not proposing improvements to. It was agreed that there would be little merit in the Appellant providing designs on sections that Whitenap had already considered, including at the A27/Botley Road/Premier Way roundabout, which had also included a cycle level of service assessment (CLoS).

4.1.6 The Whitenap drawings submitted to TVBC in summer 2024 were reviewed. I felt that the drawings submitted contained accurate and appropriate designs.

4.1.7 During the second Teams based meeting on 4th December 2024 and in a number of follow-up emails, I discussed the routes that the Appellant should focus on with HCC's officer. It was agreed that the focus should be on the following:

- Botley Road between Montford Road and Rownhams Lane (LCWIP Route 280 and 332);
- Botley Road between Whitenap Lane and Montford Road and Halterworth Lane between Botley Road and Saxon Way (LCWIP Route 280 and 332);
- Halterworth Lane between Saxon Way and School Road/Winchester Road (LCWIP Route 332); and
- Plaza Theatre to Romsey Train Station (LCWIP Route 331).

4.1.8 My understanding was that HCC required preliminary designs (rather than detailed design level drawings) that could be used for costing purposes. The costs of the improvements would then be considered and a reasonably related in scale and kind S106 based contribution requested. It was acknowledged that the Appellant would not be expected to cover the full cost of the works and contributions would be sought from other developments in the area to cumulatively to fund all the works.

4.1.9 As detailed topographical surveys of the routes were required to ensure accurate designs, along with highways searches to ascertain the extent of public highway available, TTN1 was produced to address the other issues raised in HCC's consultation response while the survey and design work took place.

4.2 Rights of Way and Countryside Consultation Response

4.2.1 HCC's Rights of Way and Countryside consultation response dated 15th February 2024 (CD 3.9) recognised and welcomed the suggested integration and upgrade of path FP15 (also referred to as 198/15/1) into the development proposals along with additional paths and areas of public open space. The authority requested suitable mitigation for FP15 in the form of resurfacing for its full 610m length or a commuted sum to enable HCC to provide the works. As the improvements had not been formally agreed at the time, an objection was raised which formed RfR 5.

4.3 Transport Technical Note 1 (TTN1)

4.3.1 TTN1 (CD 8.11) provided an update on discussions with HCC and addressed the items raised in HCC Highways' consultation response (CD 3.19) along with the Rights of Way and Countryside response (CD 3.9), with the exception of the active travel improvements. The items from the consultation responses were addressed as follows.

Access Proposals

4.3.2 Minor revisions were made to the proposed access drawings. This included amendments to the proposed dropped kerb and tactile paving arrangements across the access junctions, across Halterworth Lane and across several side roads, along with inclusion of dimensions and annotation of footpath 198/15/1 for illustrative purposes.

4.3.3 Updated swept path analysis was presented to affirm the suitability of the access junction geometry and further justification was provided to support the proposed spacing of the northern access junction with Saxon Way.

PRoW Upgrade

4.3.4 The Appellant confirmed their willingness to fund the upgrade of footpath 198/15/1 (FP15), directly addressing RfR 5.

Sustainable Mode Improvements

4.3.5 An update and rationale were provided for the LCWIP based active travel improvement scheme, also recognising that the improvements would be designed in accordance with the recommendations of the DfT's *LTN 1/20 Cycle Infrastructure Design* and HCC's *TG10 – Pedestrian and Cycle Facilities*.

School Parking Proposal

4.3.6 Further commentary of the school parking offer was provided. It was stressed that as the Appeal was for outline planning permission with the internal layout being a reserved matter, a degree of flexibility was required to ensure that the eventual housebuilder would have the opportunity to consider the most appropriate form and location of the car parking as part of their masterplanning process.

4.3.7 HCC's preference is for a "Park and Stride" facility whereby parents and guardians can park in a safe location and walk to/from school. HCC is mindful that providing too much parking can encourage car trips as opposed to more sustainable active travel trips, so it will be important not to overprovide parking spaces.

4.3.8 It was also presented that the length of double yellow lines suggested at the southern access would be equivalent to six car lengths so this could be considered to be the minimum number of spaces required internally to the site, though a larger figure could be provided.

4.3.9 The Appellant committed to accepting a suitably worded condition for the parking provision and that is reflected in the draft conditions list being agreed with the LPA.

Confirmation of Committed Developments Assessed

4.3.10 It was confirmed that all committed developments agreed at the preapplication stage were included in the assessment. The TVBC planning portal was reviewed at the time of writing and no additional developments would constitute committed developments meaning that the impact assessment remained up-to-date and suitable to draw conclusions from.

CLoS Assessment of A27/Botley Road/Premier Way Roundabout

4.3.11 It was stated that a CLoS should not be required as one has been undertaken by the Whitenap applicant which has also informed the mitigation scheme presented by them. This approach has been accepted by HCC.

Amendments to Travel Plan

4.3.12 A number of amendments were made to the TP in line with HCC's consultation response. Further amendments were made to the TP following submission of TTN1 which are detailed below.

4.4 Rights of Way and Countryside Agreement

4.4.1 HCC's Rights of Way and Countryside Officer provided a request for a contribution of £85,278 towards the improvement of 198/15/1 (FP15). The improvements will cover the full 610m length of the path from Halterworth Lane through to Highwood Lane and upgrade it to a bridleway so that it can be used for horse riding and cycling, though the latter is likely to be much more common than the former.

4.4.2 The Appellant agrees with the above request and RfR 5 is now fully addressed.

4.5 Final Access Drawings

4.5.1 HCC acknowledged the suitability of the revised proposed access drawings appended to TTN1, however, the LHA requested that the highway boundary extents should be overlain. These final drawings were issued via email on 7th February 2025. There is no material change to the design of the proposed accesses but these drawings should be referenced in the condition for approval related to access as they are the latest versions:

- P21004-001E: Proposed Access Strategy - Northern Frontage (CD 8.1); and
- P21004-002D: Proposed Access Strategy - Southern Frontage (CD 8.2).

4.5.2 The associated swept paths are shown in Drawings P21004-003C (Northern access) (CD 8.3) and P21004-004C (Southern access) (CD 8.4). These show suitability of the access designs but are not needed to be approved or referenced in any permission.

4.5.3 Drawing P21004-006B (CD 8.14) submitted to HCC via email on 19th February 2025 presents the swept path analysis between the proposed northern site access and Saxon Way, correcting an error in the title of the earlier version sent via email on 7th February 2025.

4.6 Active Travel Improvement Scheme

4.6.1 Five drawings, inclusive of an overview drawing, were issued to HCC and TVBC (cc'd) via email on 7th February 2025 detailing the LCWIP based active travel improvement scheme. These drawings are as follows:

- P21004-100: Pedestrian & Cycle Improvements - Overview Plan;
- P21004-101: Pedestrian & Cycle Improvements Sheet 1 Botley Road between Montford Road and Rownhams Lane (LCWIP Route 280 and 332);
- P21004-102: Pedestrian & Cycle Improvements Sheet 2 Botley Road between Whitenap Lane and Montford Road and Halterworth Lane between Botley Road and Saxon Way (LCWIP Route 280 and 332);
- P21004-103: Pedestrian & Cycle Improvements Sheet 3 Halterworth Lane between Saxon Way and School Road/Winchester Road (LCWIP Route 332); and
- P21004-104: Pedestrian & Cycle Improvements Sheet 4 Plaza Theatre to Romsey Train Station (LCWIP Route 331).

4.6.2 The suggestions and aspirations of the LCWIP were used as a starting point but our own suggestions were added, mainly as some of those in the LCWIP do not look feasible (primarily due to third party land requirements). The designs focus on the sections of the LCWIP routes in proximity to the site except for those that Whitenap has already considered. The designs will tie-in well with what Whitenap has suggested.

4.6.3 From my understanding, the core points from the LCWIP and HCC design guidance are that separate cycleways and footways should be provided (not shared facilities, these being a last resort) and where there are constraints, the infrastructure provision should not require crossing from one side to the other frequently. In instances of the latter, the preference is for the implementation of a 20mph speed limit and traffic calming features to support this. I further understand that HCC does not favour vertical deflection (speed cushions, humps, bumps etc.) due to maintenance liabilities so we have considered horizontal deflection in the form of build-outs/narrowings, taking inspiration from existing features on Botley Road. This predominantly applies to the section of Botley Road west of Halterworth Lane where the verges are too narrow to provide a separate cycleway (Sheet 2) and Halterworth Lane (Sheet 3).

4.6.4 We have suggested toucan crossings on Botley Road and Winchester Road, this is because Active Travel England's advice in its Crossing Selector Tool (which is more recent than the LCWIP) is for crossings to be signal controlled on roads where the daily volume of traffic exceeds 8,000 vehicles per day, which would be the case on both roads. We have also suggested some junction tightening and additional tactile paving to aid pedestrian movements.

4.6.5 On the right-hand window of Sheet 3, we undertook title searches for the land around Campion Drive and Bramble Drive. The main parcels are owned by HCC and TVBC but the bend in the traffic-free path is owned by the adjacent properties so we have suggested two alternative routes, though the constrained section would be only across a fairly short length (<20m).

4.6.6 On Sheet 4, which shows the canal towpath route to the train station, the suggestion in the LCWIP was to cantilever the towpath and/or use third party land which I do not think is workable. We have

suggested that Mountbatten Avenue could be an alternative route, with it being a lightly trafficked residential street.

4.6.7 HCC provided its response to the active travel improvement scheme via email on 27th February 2025. The highway authority recognise that the package is comprehensive and provides a useful basis for undertaking costings work. The total package of works was costed by HCC at £4,289,984.20 but felt that it would be:

> *'disproportionate for the development to fund the entire works package'*

4.6.8 Therefore, HCC suggested the following:

> *'To ensure that the contribution request meets the relevant tests of CIL, the Highway Authority requires a financial contribution of £1,746,533.08. This contribution figure is considered to be proportionate based on the package of works you have designed and is also reflective of the lack of wider capacity improvement works being put forward in light of LTP4 and the shift towards improvements to sustainable modes.'*

4.6.9 Further information regarding the costings was sought from HCC, with the LHA responding with the following via email on 27th February 2025:

> *'This [figure] incorporates the base construction cost of the works, and the additional costs for Hampshire to deliver the schemes via contribution (traffic management, contingency, preliminaries, design fees, RSA fees and optimism bias)'.*

4.6.10 HCC further explained that the contribution was based on the improvements shown in Sheets 3 and 4 but flexibility was requested in the wording of the contribution to allow the funds to be spent on the other LCWIP routes identified. HCC stated that there was no double counting of contributions from other developments.

4.6.11 The requested figure of £1,746,533.08 is agreeable to the Appellant.

4.7 Further Travel Plan Update

4.7.1 Several further revisions were made to the TP following discussions regarding the TP measures costs. A final cost of £57,500 along with a monitoring fee of £15,000 and an approval fee of £1,500 is agreed and acknowledged in Revision D of the TP (CD 8.10). The TP is agreed with HCC.

4.8 Highways Statement of Common Ground

4.8.1 A draft highways specific Statement of Common Ground (SoCG) was issued to HCC via email on 26th February 2025 with HCC responding with relatively minor changes on 3rd March 2025. The SoCG is reflective of the Highways Position Statement submitted to the Planning Inspectorate on 3rd March 2025 (CD 8.13).

4.8.2 It is agreed that there are no matters of disagreement relating to highways, subject to conditions and obligations that are currently largely agreed subject to the final wording. A final SoCG signed by both parties will be provided to the Planning Inspectorate in due course.

5 RESPONSE TO THIRD PARTY COMMENTS

5.1 Summary of Responses

5.1.1 Local residents and businesses have been consulted on the planning application and the appeal. A summary of the main highways issues raised is as follows:

- The appeal proposals would exacerbate any existing traffic congestion issues on the local road network, particularly during school drop-off and pick-up hours;
- Car movements generated by the appeal proposals pose safety risks to the pupils of Halterworth Primary School and children in general, particularly at when walking to school; and
- The appeal proposals will increase pressure of town centre parking.

5.1.2 The interest from local people in the proposed development is welcomed and I have provided a response to each point in turn below.

5.2 Traffic Congestion

5.2.1 I have visited Romsey on a number of occasions at different times of the day. I acknowledge that it is a relatively busy town, particularly during the weekday peak periods but with traffic flows being lower in the inter-peak and off-peak periods. Changing work practices, particularly post-pandemic, have provided commuters with greater flexibility in terms of allowing increased levels of working from home, hybrid working and greater variation in work start and end times, so that many people can avoid the traditional peak hours.

5.2.2 A detailed Traffic and Transport ES chapter (CD 1.23) was prepared in line with industry recognised guidance. A TA formed Appendix 6.1 of the ES chapter, itself being based on industry recognised guidance and best practice. The scope of the assessment was agreed with HCC at the preapplication stage. It uses detailed, neutral survey data to ascertain baseline conditions which then inform the traffic forecasting process that uses a number of tools and data sources to provide a reasonable estimate of future traffic levels on a robust basis. Specialist junction modelling software is used to consider junction performance and traffic impact.

5.2.3 The TA concluded that the proposed development would not result in a *'severe'* residual cumulative impact in line with national planning policy.

5.2.4 The TA has been reviewed by the experienced professional officers at the LHA who are responsible for the safe and efficient operation of the local highway network. HCC did not raise concerns related to traffic impact on the highway network and all matters are agreed subject to conditions and planning obligations to mitigate the impact of the proposed development from a sustainable travel first approach.

5.2.5 The TA is supported by a TP that aims to promote and encourage sustainable travel to and from the site. Sustainable active travel will be further encouraged through the funding to be provided towards HCC's LCWIP based improvements.

5.3 Safety Risks in the vicinity of Halterworth Primary School

5.3.1 The TA undertook a highway safety review using personal collision data for a recent five-year period. No collisions were reported in the vicinity of the primary school and there is no evidence to suggest that the proposed development will result in collisions.

5.3.2 The proposed access arrangements have been subject to an independent Stage 1 RSA by qualified professionals who raised only minor issues that have been addressed to the satisfaction of the professional officers at HCC. The safety audit process will continue at the detailed design stage (Stage 2) and post-construction (Stage 3) so further independent reviews will take place.

5.3.3 The LCWIP based active travel improvements suggest that Halterworth Lane could have its 30mph speed limit reduced to 20mph, with additional traffic calming features, which will be of significant benefit to school children and will bring Halterworth Lane in line with many roads across the country that serve primary schools and are subject to 20mph speed limit restrictions. It is also anticipated that these active travel improvements will encourage more school children to walk, cycle and scooter to and from school, reducing car movements.

5.3.4 The Appellant and HCC recognise that the on-street parking in the vicinity of Halterworth Primary School is a local issue. As such, the Appellant is agreeable to providing parking within the site to reduce current levels of on-street parking and to provide safer opportunities for parking.

5.4 Town Centre Parking

5.4.1 The availability of and impact on town centre parking has not been raised as an issue by HCC at either the pre or post-application stages. There is a fine balance to town centre parking provision; providing a surplus of parking can encourage car trips but it is HCC's, and indeed national, policy to promote and encourage sustainable travel, particularly walking, cycling and public transport, ahead of motor vehicle centric improvements.

5.4.2 The TA has explained that the town centre is within a reasonable walking distance for some people as well as a reasonable cycling distance. The LCWIP based walking and cycling improvements should further encourage such trips meaning that many people from the proposed development will be able to leave their cars at home for many town centre trips. Romsey town centre can also be accessed via local bus services.

6 SUMMARY AND CONCLUSION

6.1 Summary

6.1.1 My Proof of Evidence has provided a summary of the TA and TP submitted in support of the planning application (see Section 3). Both documents were prepared following preapplication discussions with HCC and in line with national and local policy and guidance as well as industry best practice.

6.1.2 The TA concluded that the proposed development would not result in an *'unacceptable impact on highway safety'* nor have a *'severe'* residual cumulative impact on the operation of the highway network terms of capacity, in line with NPPF.

6.1.3 Following refusal of the planning application, I have engaged in discussions with the LHA to address the two RfRs given.

6.1.4 The Appellant agreed to fund the upgrade of footpath 198/15/1 to a bridleway at a contribution of £85,278. RfR 5 is therefore addressed.

6.1.5 The comments raised in HCC Highways' consultation response were primarily addressed in TTN1 (CD 8.11) which is also summarised in my Proof (Section 4.3).

6.1.6 One matter addressed following TTN1 was the design of an active travel improvement scheme. It was agreed that in order to mitigate the impact of the proposed development and to maximise its accessibility, the Appellant would need to fund HCC led active travel improvements in line with the aspirations of the LCWIP. The Appellant instructed Prime to produce preliminary designs of the active travel improvements which has formed an agreeable basis for costings purposes. HCC has requested a sum of £1,746,533.08 which is based on a commensurate level of contribution fairly and reasonably related to the development. The sum to be secured by S106 contribution is agreeable to the Appellant.

6.1.7 A summary of the S106 obligations proposed by HCC are as follows, though they are still being negotiated and agreed with the Appellant:

- Payment of £85,278 towards the upgrade of footpath 198/15/1;
- Payment towards the modification of a TRO on Halterworth Lane;
- Contribution payment towards updating the School Travel Plan for Halterworth School;
- Payment of a £1,746,533.08 contribution towards sustainable transport improvements located on LCWIP routes 280, 331 and 332; and
- Payment of Travel Plan approval (£1,500) and monitoring (£15,000) fees, along with a Travel Plan budget (£57,500).

6.1.8 The proposed access arrangement has been subject to an independent Stage 1 RSA and is agreed with HCC. The proposed access arrangement will be secure via planning condition for delivery via S278

agreement. The site access works are shown in principle in drawing numbers P21004-001E (CD 8.1) and P21004-002D (CD 8.2).

6.1.9 The Appellant also agrees to a condition to provide suitable parking spaces to provide "Park and Stride" facilities to address the demand for school drop-off and pick-up parking for Halterworth Primary School. This will generally conform to the principles for the development of the site as set out on the DFP FPCR-ZZ-ZZ-DR-L-0002 P10 (CD 6.2).

6.1.10 A number of objections have been raised local residents concerning traffic congestion, safety and town centre parking. The detailed evidence base addresses these comments with further commentary provided in Section 5 of my Proof. I believe that these concerns should not prevent planning permission for the Appeal site. It is also important to note that the professional officers at HCC do not share these concerns.

6.1.11 The active travel improvement scheme will offer considerable benefit to existing local residents and road users.

6.1.12 An SoCG has been drafted following review by HCC. There are no matters of dispute subject to agreement of the final wording of the conditions and obligations. RfR 4 has therefore been addressed.

6.2 Conclusion

6.2.1 The development proposals will not result in a *'severe'* residual cumulative impact on the local highway network, the key test of the Framework and there is no evidence to suggest that there are any existing highway safety issues that would be exacerbated by the development proposals. The proposals are in a sustainable, accessible location in one of the Borough's larger settlements, accessible to services and facilities and promotes sustainable means of travel by foot, cycle and public transport. The proposals are therefore in line with NPPF.

6.2.2 In my professional opinion, I see no reason why the development proposals on the Appeal site should be refused on highways grounds. This view is also held by the professional officers at HCC who are responsible for the safe and efficient operation of the local highway network. No areas of dispute with HCC remain.