

Eastleigh Borough Council

# **GE Aviation – Hamble Lane**

Summary of Proof of Evidence – Highways and Transportation

of

Ed Whitney BSc (Hons) MSc MCIHT TPP

on behalf of Eastleigh Borough Council

Land at GE Aviation, Kings Avenue, Hamble-Le-Rice, Southampton, SO31 4NF

Appeal by GE Aviation

Planning Inspectorate Reference: APP/W1715/W/20/3255559

Eastleigh Borough Council Reference O/18/84191

Issue | 13 October 2020

**ARUP**

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**Ove Arup & Partners Ltd**

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 237035-31

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# 1 Summary of Proof of Evidence

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- 1.1.1** My proof of evidence relates to two of the reasons for refusal outlined in the decision notice dated 16<sup>th</sup> January 2020:

*Reason 2: The proposal fails to demonstrate that an appropriate means of access can be provided, particularly in terms of footpath and cycleway impacts, which would be to the detriment of pedestrians and cyclists; and*

*Reason 3: The proposal would cause serious adverse traffic impacts on the local highway network*

- 1.1.2** My evidence examines the methodology and results associated with the highways and transportation materials prepared in support of application O/18/84191.

- 1.1.3** I have worked with the appellant on areas of common ground and have prepared this Proof of Evidence in relation to those areas where agreement has not been possible.

- 1.1.4** The evidence presented within my Proof of Evidence is summarised in Table 1. The evidence presented can be simplified into the following two summaries:

## **Reason 2 – Summary of Proof of Evidence**

**The proposed access junction arrangement is detrimental to pedestrians and cycles, and there are elements of the design which introduce new safety risks.**

**The road safety audit does not appear to have been adequately briefed on the proposed arrangement and as such its findings could not properly consider all relevant road safety matters.**

**The development proposals do not properly promote sustainable transport modes, as required by paragraph 108 of the NPPF.**

### **Reason 3 – Summary of Proof of Evidence**

**Flaws in the Transport Statement’s methodology mean that its findings underestimate the traffic impacts of the proposed development. As such the consultation position adopted by HCC was based on an underestimate of traffic impact.**

**Taken together, the Transport Statement and the commitment to contribute to S106 mitigation schemes nevertheless indicate that the traffic impacts of the proposed development would be severe if unmitigated.**

**No attempt has been made by the appellant to demonstrate that the principal mitigation measures, relied upon to offset the traffic impacts, are sufficient. What little assessment has been undertaken in relation to mitigation is flawed.**

**The principal mitigation measures required to offset traffic impact – the proposals associated with the Hamble Lane Corridor Study - are not reasonably foreseeable.**

**As such, it has not been demonstrated that the significant impacts of the development on capacity and congestion can or will be mitigated to an acceptable degree, as also required by paragraph 108 of the NPPF.**

- 1.1.5** On the basis of the findings in the main Proof of Evidence, it is considered that the proposed development should not be granted planning consent.

Table 1: Summary of Arguments presented within this Proof of Evidence

Reason for Refusal	Policies Cited in Reason for Refusal	Simplified Summary of Case	Area of Evidence	Detailed Evidence
Reason 2 – Unacceptable Means of Access and Impacts on Footpath / Cycleway Infrastructure	<i>Saved Policies 59.BE(v), 92.T and 102.T of the adopted Eastleigh Borough Local Plan Review 2001-2011, emerging Policy DM13 of the submitted Eastleigh Borough Local Plan (2016-2036) and the provisions of the National Planning Policy Framework</i>	The proposed access junction represents a loss of amenity and safety risk for pedestrians and cyclists	The proposed arrangement represents a lack of amenity for pedestrians and cycles	The proposed access junction would increase journey times and journey distances for some pedestrians and cyclists. Desire lines for both user groups are negatively affected by the proposals, which require pedestrians and cycles to take a less direct route than the present arrangement.  The level of provision does not meet national design standards.
			The proposed arrangement introduces design features which are considered to reduce road safety	The crossing points of Kings Avenue and Coach Road are suboptimal for pedestrians and cycles. The requirement for cycles to use the footway to the west of Coronation Parade will result in a greater number of interactions with pedestrians. The Road Safety Audit does not appear to give proper consideration to the cycle route.
Reason 3 – Serious Adverse Traffic Impacts on the Local Highway Network	<i>National Planning Policy Framework saved policies 100.T, 101.T and 102.T of the adopted Eastleigh Borough Local Plan and emerging Policy DM13 of the submitted Eastleigh Borough Local Plan (2016-2036)</i>	The traffic impact of the proposed development is severe, has not been adequately mitigated and is therefore unacceptable	The methodology employed within the Transport Statement to estimate traffic flows is flawed, and underestimates traffic impacts	The observed data used to assess the traffic impact is not robust and as such the Transport Statement is unreliable. It may underestimate the impact of the proposed development. The method of estimating traffic growth not associated with the proposed development is not robust and underestimates the impact of the proposed development. The method of estimating traffic flows includes significant reductions to account for vacant land uses on the application site. The majority of land uses were in fact not vacant at the time of the surveys, and the calculations themselves are not correct. This underestimates the traffic impact of the proposed development.
			The modelling undertaken and presented within the Transport Statement is not robust, and underestimates traffic impacts	Queue length calibration at a number of junctions is unreliable since the survey data which informs it is unreliable. As such the Transport Statement may underestimate the impact of the proposed development.
				The modelling of the Signalised Junction at Cunningham Gardens has not been undertaken correctly, and as such the model outputs are not reliable and may underestimate the impact of the proposed development.
				The traffic impact of the proposed development at Windhover Roundabout has not been properly assessed. What assessment is provided within the Transport Statement understates the impact of the proposed development.
			The Transport Statement and committee report indicate that the impacts of the proposed development, if unmitigated, will be severe.	The modelling tools employed to assess the traffic impacts of the proposed development were not appropriate for the task and are incapable of producing reliable results. As such it is considered that the results presented within the Transport Statement underestimate the traffic impact of the proposed development.
			There is no evidence that the mitigation measures proposed and relied upon by the planning submission are sufficient to offset the severity of the traffic impacts of the proposed development.	Notwithstanding the underestimate of traffic impacts detailed in other areas of evidence (see above), the impacts of the proposed development, if unmitigated, would be severe. That is why the Section 106 contributions were agreed. It follows therefore that mitigation measures are required in order for the development proposals to be acceptable.
			There is no surety that the mitigation measures relied upon by the proposed development in order to offset traffic impacts will be forthcoming.	The Hound Road / Hamble Lane junction mitigation has been designed on the basis of a flawed assessment (see above arguments). The Highways England scheme at Windhover Roundabout has not been demonstrated to be sufficient to offset the impacts of the proposed development. The proposals associated with the Hamble Lane Corridor Study have not been demonstrated to be sufficient to offset the impacts of the proposed development. As such it has not been demonstrated that impacts of the proposed development, even with mitigation, will not be severe.
				The proposals associated with the Hamble Lane Corridor Study were considered by HCC to be a necessary (but not sufficient) condition of further development coming forward near to Hamble Lane. Nevertheless, HCC officers determined that this position should not apply to the application under current consideration.  Evidence provided by HCC indicates that the proposed mitigation is not reasonably foreseeable as there is insufficient funding in place to secure its delivery.  As such it is clear that the highways mitigation measures relied on by the appellant, and which are defined by HCC as a necessary condition for development, are not directly linked to implementation of the development and have significant uncertainty over delivery. If this mitigation is not implemented prior to implementation of the development, the impacts of the proposed development would be severe.