

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/19/02432	Your Ref:	APP/19/00703
EH Case Officer Extn:	44 6677	Date:	29 November 2019
DC Case Officer:	David Eaves		
DC Case Officer Extn:	44 6549		
Application Number:	APP/19/00703		
Site Address:	Langstone Technology Park, 2B Langstone Road, Havant, PO9 1SA		
Proposed Development:	Part-demolition of Building 1000 and associated works; the erection of new flexible use industrial units; and a new parking layout with associated works to layout and access. RECONSULTATION for revised plans and/or documents received		

Observations / Comments:

Comments here relate to the revised REC Air Quality Assessment (AQ107578R1) & DTA Response to Consultees on Transport and Highways Matters (RJM/20428-06e Response).

Further comments may be received from my colleague (Lisa Duffy) under separate cover in relation to other matters. These comments should be read in conjunction with those made previously (APP/19/00703 made under CONS/19/01560 & dated 27/08/2019); this response only supersedes that response where comments overlap.

Traffic Assessment

Pages 7 & 8 provide some clarification on the traffic routing model applied, and Appendix F contains additional traffic figures.

It is noted that material inconsistencies exist between the proportional distribution, and the net change figures presented, and also between the net change figures for site trip generation and those accounted for at both Peak Periods and on a 12 Hr basis. The reason for this is unclear.

The figures presented appear to assign the majority of 'saved' trips to the East access (Langstone Road), despite the survey data indicating an approximate 50/50 split between east & west.

Air Quality Assessment

The Transport Assessment indicates that the Air Quality assessment has been reconciled to traffic figures which are consistent with the Transport Impact / Junction Capacity Assessments.

This change has materially altered the results of the Air Quality assessment, almost universally elevating the baseline (DM) scenario, and reducing the 'with development' (DS) scenario predicted concentrations.

At least one 'stand-out' anomaly exists - with a substantial (>10% NAQS Objective, or 4 ug/m3) Nitrogen Dioxide concentration response at R18 (Rectory Road), based upon a net change in traffic on the closest link of <40 vehicles AADT. An equivalent magnitude of response is not seen in receptors close to Langstone Road, where around 70% of the trip reduction associated with the development (relative to 100% occupancy) has been allocated.

Taken together with the inconsistencies within the traffic data presented in RJM/20428-06e Response; this undermines confidence in the accuracy of results.

Ultimately, the 'headline' is that the proposed development is expected to yield a reduction in whole site trip generation relative to its consented landuse (at 100% occupancy). Conceptually, an adverse air quality impact of material significance cannot arise from a reduction in traffic unless there is a substantial shift in vehicle type, routing bias, or temporal distribution of the traffic generated.

For this reason, I do not require the amendment of the air quality report, and can accept its overall conclusion on a broad conceptual basis, subject to Hampshire County Highways being satisfied in the robustness of the junction capacity assessment & the impact shown being either non-adverse or of acceptably low magnitude.

The comments of the Landscape architect regarding cycle & pedestrian enhancements are noted, and supported as positive amendments from an air quality perspective.

Similarly, the allocation of roof space for PV installation to meet the required BREEAM standard is considered to represent a positive scheme enhancement from an air quality perspective.

I would highlight that the parking layout plans do not appear to have made a design response to the requirement to provide a minimum allocation of EV charging bays. I have not had time to go through the design and access statement, so it is possible that this element has been addressed elsewhere. If not, I would point to the comments of PPUD, and would support the requirement for an EV charging provision in the proposed car parking, as a positive air quality measure.

On the basis of the comments above, and subject to caveats described, the development can be supported.

SuDS / Pollution

I have not reviewed the revised documents in detail, but I have noted the comments of the LLFA, which accept the proposals, but don't appear to address pollution mitigation specifically. Please refer to previous comments made.

Contamination

Previous comments / recommendations remain valid.

Mr. Jonathan Driver
Environmental Control Officer