

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/19/01842	Your Ref:	APP/18/00234
EH Case Officer Extn:	44 6677	Date:	02 October 2019
DC Case Officer:	David Eaves		
DC Case Officer Extn:	44 6549		
Application Number:	APP/18/00234		
Site Address:	Land and highway at Wellington Way Shopping Centre, Wellington Way, Waterloooville		
Proposed Development:	Demolition of existing shopping parade and redevelopment of the site to provide a nine storey building consisting of 264 No. 1 bed/studio build to rent apartments and associated amenity facilities, an A2 unit (Financial and Professional Services) together with associated parking and landscaping.		

Observations / Comments:

I have reviewed the revised documentation - taken to comprise the RHDHV Transport Assessment Addendum Report, Car Park Elevations. and the Daniel Watney response to the Landscape Consultee.

Transport Assessment Addendum - Air Quality

The RHDHV addendum report was principally put together to address comments raised by highways consultees, and as such it does not directly address the comments made previously by Environmental Health.

Some of the content is air quality relevant, so I would like to provide some comment.

Car Club

The report includes a clarification on the proposed Car Club provision - noting that the intention is to allocate one specific bay (only), for provision of a single vehicle. The club is to be promoted by the travel plan coordinator (TPC), and usage monitored. Demand-driven amendments to provision are to be considered and negotiated with the building operator - upto a maximum 10 allocated spaces (and 10 vehicles). There is no commitment to provision of any specific vehicle type (e.g. LEV / ULEV / EV) or size (e.g. small 'city-car', or a more versatile 4-passenger vehicle with greater load-carrying capacity).

This strategy is contingent upon at least 9 of the on-site parking spaces being 'unallocated' (which would not exclude unallocated 'permit-holder-only' spaces) with respect to both the residents and the active frontage businesses.

I appreciate the commercial driver for a 'start small & expand if successful' strategy, but think perhaps that an initial provision of just 1 no. vehicle for a development of 264 units (potential for >

500 persons) could be pitching the service a little 'too small', especially if the vehicle is also to be made available to other club members (as is likely).

An initial provision of this scale will necessarily limit availability of vehicles to suit varying needs, and provides little capacity at the point where the service is being promoted for residents to try. This risks discouraging uptake in the early period of occupancy, and would likely create a lasting impression of 'unavailability', even where capacity is subsequently increased. It will also make it difficult to gauge demand or preference for a vehicle of a different type, fuel, or capability than the one initially offered - placing a substantial weight for the success of the scheme on the initial vehicle choice.

My understanding of how car clubs work is that a vehicle need not be permanently based at a given location, and that there should (therefore) be some flexibility to draw upon the pre-existing fleet (i.e. expanding the initial offering need not necessarily involve the purchase of an additional vehicle). With this in mind, I would recommend that the applicant consider doubling the initial provision & offering differing vehicle types during the initial period of active promotion - this is likely to significantly increase the probability of securing a local customer-base for the service. The offering of introductory scheme credit to new residents would also encourage 'hands-on' trial of the club by residents.

Irrespective of whether the above recommendation is implemented or not, the success of the Car Club at this location (i.e. it's monitoring, active management, and expansion) is intrinsically linked to the performance of the Travel Plan Coordinator, to the monitoring & oversight of residential travel plan, and is dependent on the cooperation of the building operator. In this way, there are opportunities for this otherwise very welcome provision to fail to deliver tangible benefits. It would be helpful if the s106 which secures the general Travel Plan and the bond for it's monitoring is drafted so as to provide a realistic prospect of maintaining the impetus to actively implement the plan, with reasonable sanctions & incentives to ensure that the oversight of performance against the plan is effective.

Cycle Accessibility

Sections 3.3.2 & 3.3.3 describe the cycle routes to & from the proposed development, principally focusing on Northbound Journeys via Hambledon Road, and both South & Westbound Journeys via Stakes Hill Road. Journeys to the Northeast (A3) and East (B2150) are not given any attention in this section.

A Streetview 'fly through' of these routes shows that the A3 route - whilst designated as and off-road section of NCN 222, appears disjoint & poorly signed, with sections of segregated pedestrian / cycle lanes separated by sections of footpath which are not clearly marked as shared surface. The B2150 Hulbert Road doesn't appear to serve as either a national or local cycle route, lacking either a signed shared surface or on-road cycle lane - this is a constrained route which is congested at peak times, and as a feeder route for the strategic road network, is an un-welcoming environment for cyclists.

This latter route provides the most direct access to the Dunsbury Hill Farm employment area, and given the target market for the residential development (young working age adults), it strikes me that this route might provide the most appropriate focus for any cycle infrastructure improvements (or contributions toward improvements-) that may be required to support this development.

I note the text of 3.3.4 which suggests an amendment to local Traffic Regulation Orders (TRO) in order to allow cycles to use bus lanes, to improve permeability of the town centre to cyclists.

I would support this as a positive air quality measure, provided that to do so would not lead to an increase in risk to cyclists from conflict with busses.

Trip Rates

For the commercial transport demand, I would agree that the Cafe trips are unlikely to be primary trip-attraction, and that the majority of associated trips are likely to be of linked / pass-by / diverted type. I am less sure that the Gym will attract a zero trip rate, as the resident-only patronage is 'anticipated' but not firmly proposed. The facility forms part of the active frontage (arguably not meeting this description if provided on a 'residents only' basis), meaning that in the event that the quantum of residential development fails to provide an adequate customer-base for the facility, is it likely to seek external custom. A gym is considered sufficient attraction to generate independent trips, and so some trips are considered foreseeably-likely to be associated with this facility.

For the residential trip demand, I would broadly agree with the factors listed in 5.2.7 as reasons why development trip rates are likely to differ from the Waterlooville census average. The report places overall private motor car (passenger car unit, PCU) trip rate for private residential tenure at around 29%, with a fairly generous 9% anticipated to be PCU passengers (+20% single-occupancy trips = 29%). Against the available TRICS data, 29% this would seem to be a reasonable 'middle estimate', though it should be noted that the available surveys covered a relatively broad range of modal apportionment.

The report also notes that the trips will have a 'distributed' impact owing to the segregation of different parking areas which are accessed from different roads. Objectively however, the 'left-in-left-out' (LILO) access arrangement from Maurepas Way, coupled with the local TRO (Bus Only) restrictions in the vicinity mean that almost all PCU-mode trips will route via one or both carriageways of Maurepas Way, and the LILO arrangement means that reciprocal trips will present as '3-way' trips (as described previously - CONS/19/00996 04/06/2019), being both eastbound & westbound on Maurepas Way for one leg of the journey.

Taking worst case (all PCU trips as single occupancy, i.e. 29%), the development trip rate expressed as AADT is expected to be around 469 (2-way development trip demand). As '3-way' trips on the immediate highway network (as outlined above), this estimate will increase such that the link impact on Maurepas Way may comfortably exceed +500 light duty vehicle (LDV, which includes PCU's) representing >+1.8% traffic impact (against 2017 surveyed 2-Way flows). This exceeds the IAQM guideline screening threshold for air quality assessment (implying that a material air pollution impact is possible) at the roadside of Maurepas Way.

This link is largely devoid of sensitive receptors, save for 'Apsley Lodge' located around 9m from the kerbside of the A3/B2150 junction, and adjacent to a previously measured exceedances of Nitrogen Dioxide limit values.

As has been previously noted, this does not necessarily mean that a significant air quality impact from this development is likely, but does serve to highlight the Eastern end of Maurepas Way to be an 'at risk' location, and to emphasise the need to resist upward pressure of local emissions at this location.

In line with the principles of the emerging Air Quality Policy, ensuring that the development is 'as sustainable' as it can be for this location may be a preferable strategy than focusing on the quantifying the contribution of the development to local air pollution levels at specific locations.

Policy update

The policy update refers to allocation / principle of development only. Previous comments regarding the body of Local Plan 2036 policies governing the form of development and the mitigation of its impact are equally applicable, as those policies underpin- (serve to make acceptable-) the allocations included within the plan.

These latest comments should be read in conjunction with previous comments CONS/19/00474 05/04/2018 (APP/18/00234), and CONS/19/00996 04/06/2019 (APP/19/00513); the latter including

a section on emerging Air Quality and Infrastructure policy.

Car Park Proposal Amendments, and Response to Landscaping Consultee

It is noted that the Daniel Watney LLP response proposes several conditions to defer the securing of landscaping details to a time which is post-decision. I have no objection to the proposed approach.

I also note that the response also clarifies the intentional omission of terrace planting- the comments provided under APP/18/00234 (CONS/18/00474, 05/04/2018, 'Sedum Roof / Green Infrastructure & Air Quality') therefore remain broadly applicable.

Justifications are given for the inability to introduce planting at ground level due to access requirements. I would not challenge the constraints, but would comment that Green Walls could provide an opportunity for softening the development or marking entrances etc. without interfering with access arrangements. From an air quality perspective, green walls form a very effective / efficient form of planting which minimises the potential for planting to achieve disbenefits (e.g. by reduce air-mixing, as can happen with dense canopied trees with spreading habit). Condition suggested to control planters, and hard landscaping.

As regards the amendments to the Car Park elevations, I note the proposed planting on wire grids to the 'South' (Elevation, behind the Fastigate Oaks. As is outlined in the paragraph above, and within previous consultation responses, green walls are considered to be very suitable for this location & type of development, and the inclusion of this feature is supported as a positive feature that is likely to mitigate the emissions contribution of the development to local pollution levels in ambient air.

I note that the Landscape Consultee also supports the Wire Frame / Climbing Plants feature, but would wish to see greater use on the East and North elevations. I note that the North elevation has available access to soil (landscaped verge), and that this elevation is unhampered by either undercroft parking or vehicle ramps. It is also roadside adjacent (A3 / Maurepas Way), and so closest to the principle emissions source adjacent to the development red-line. Deployment of the green 'curtain' / 'wall' feature on this elevation would likely have the maximum positive air-pollution impact, and would therefore be supported if it could be secured.

The plans do not propose such deployment, and instead refer to a '*potential landscaping enhancement to existing verge*'. Such enhancement is not necessarily mutually exclusive to deployment of a green 'curtain' on this facade, but in any event would deliver an enhancement over the existing grass cover in terms of air pollution mitigation performance of this planted area. Selection of species with a 'Moderate' Urban Tree Air Quality Score (UTAQS - See Woodland Trust Urban Air Quality Discussion Paper, 2012), and providing a mix of low shrubs / taller specimens would provide the maximum air pollution benefit.

Any landscaping improvement on this verge would be viewed as being a positive change in air quality terms. This location is seen as negligible risk of unintended adverse impacts (from planting / intervention) and is close to source, so is likely to have robust positive impact on local background levels of air pollutants in the general vicinity.

Mr. Jonathan Driver
Environmental Control Officer