

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/19/00996	Your Ref:	APP/19/00513
EH Case Officer Extn:	44 6677	Date:	04 June 2019
DC Case Officer:	David Eaves		
DC Case Officer Extn:	44 6549		
Application Number:	APP/19/00513		
Site Address:	Car Park, Wellington Way, Waterloooville		
Proposed Development:	Erection of three-storey multi-storey car park to provide 263 car parking spaces on existing Wellington Way car park.		

Observations / Comments:

I have reviewed the supporting documents to this application and would like to provide comment in respect of Air Quality (only). My colleagues may provide comment under separate cover as regards amenity / nuisance issues.

Objections

It is noted that most comments & objections have responded to the current application as a proxy to the general Wellington Way mixed use proposal. Issues highlighted which are relevant to Air Quality are highways impacts, overspill parking, road & highway junction capacity, and (more directly), additional vehicle emissions at a time where there is significant media focus on the need for reductions.

It is considered that the parking demand assessment is sufficiently robust as to conclude that concerns about overspill parking are probably more a matter of perception - I do not anticipate issues arising (considering the APP/19/00513 & APP/18/00234 together, notwithstanding the aspiration for the 00234 development to serve as a catalyst for further regeneration).

The transport assessment does not directly address capacity (junction impacts not modelled). I will cover new vehicle trips below as a proxy for 'new emissions' - there are factors in the transport assessment which are both conservative, and which arguably under-represent the impact upon the highway network. The report states that the proportional impact on Wellington Way is 2.31% (estimated 31,600 PCU AADT). The proportional impact at the Hambledon Road & Hulbert Road Junctions is likely to be smaller (estimated 72,000 & 62,000 vehicles respectively, as AADT).

It is unlikely that the development could reasonably be said to lead to a significant impact on capacity when considered in isolation. It may be reasonable to conclude that (considered as integral part of the APP/18/00234 development) it will contribute to pressure on the local road network, though it should be noted that traffic counts taken in 2000 on the A3 Maurepas Way

the other comments are objecting to the Wellington Wy are some 17% higher than those taken in 2017. The perception of increased traffic is probably associated with increased peak-period flow intensity, rather than overall growth in volume.

Trip Generation & Air Quality

It is noted that the "left-in, left-out" (LILO) arrangement for access to the A3 Maurepas Way is to be maintained. This is relevant as the highway impact has been calculated by adding the net travel demand by private motor car modes directly to the existing flows on the A3 Maurepas Way.

Under a LILO access arrangement, reciprocal journeys originating from the proposed car park (i.e. those for permit holders) will likely present as 3-way (not as 2-way out/return). The additional 'leg' is required to access the unrestricted side of the dual carriageway; for example outbound journeys to destinations to the North or East will perform a U-Turn at the A3 / Hambledon Rd. Jct'n and return via Maurepas way for onward travel via the A3 or B2150 Hulbert Road. The reciprocal inbound journey from a destination to the North or East would not need to make a U-Turn, as travel would be on the south carriageway from which a left-turn could be made. Journeys to destinations to West or South would require the initial U-turn at the A3/B2150 Hulbert Road Junction on the return leg. Whilst it may be possible for a circular trips to avoid the need for a U-Turn manoeuvre, circular journeys are equally possible which would require a U-Turn on both outbound & inbound legs.

There is no particular reason to expect that reciprocal journeys for which the Wellington Way car park is the destination (not the origin) would be better placed to avoid the duplicated/additional trips manifesting at one of these junctions and on the Maurepas Wy carriageway.

In this way, application of the trip generation to the carriageway as 2-way trips may underestimate by as much as 1/3 the actual likely impact on Maurepas Way and at the two roundabouts Eastern & Western ends of Maurepas Way. Whether this is likely to be material in highway terms is a matter for the Highways Consultee.

From an air quality perspective, it demonstrates that this location has a slightly higher general air quality impact than would an alternative location (in terms of the average vehicle trip length, and the associated increase in emissions on the immediately adjacent local road network). In terms of direct impacts, the closest sensitive receptor is the retirement apartments at Apsley Lodge, just 9m from the kerbside of the A3/B2150 Hulbert Road roundabout, where a kerbside exceedance of National Air Quality Standards for Nitrogen Dioxide has previously been measured.

I am not suggesting that when considered in isolation, the proposed intensification is likely to lead to a material proportional impact (e.g. against the NSCA Criteria) at this location - but it does serve;

- to highlight this location as an 'at risk' junction relative to the air quality objectives,
- the risk of accidental under-representation of the trip impact of new development under a LILO access arrangement, and;
- the need to resist upward pressure on background emissions levels in this locality

Planning Policy & Air Quality

Both the Planning Statement and the Transport Assessment refer to consideration of the proposals against existing and emerging policies. The Planning statement refers specifically to policy IN3, but does not address IN3 j.(ii) Electric Vehicle Charging.

This policy is particularly relevant as Havant Borough Council has only recently installed a public charging point at the Wellington Way Car Park, which is presumably to be lost in connection with this development unless provision is made to relocate it. The proposals should consider the requirement for proportional provision of charging infrastructure under the emerging

Local Plan 2036, given the intensification of use, and the dual-purpose of the development as both 'destination parking to support town centre uses' and 'unallocated residential parking'.

Neither the Planning Statement, nor the Transport Assessment make reference to Policy E22 a) (projected levels of air pollution) or E23 (Air Quality).

I note that the Landscape consultee is calling for a different design approach, which may amount to a material objection to the current proposals and which may at least involve a new design iteration. This may present the opportunity to consider a general mitigation of the air quality impact of this development, for example by incorporating design features capable of positively influencing local air quality.

The limited space for urban planting is recognised by the landscape consultee, who acknowledges that trees of fastigate form may represent the only viable (tall) screen planting. Such trees are unlikely to be effective at intercepting and removing air pollutants at planting densities likely to be achievable at this site.

Given this, green walls may represent an alternative design feature that is both likely to be compatible with the landscaping requirements (softening the aesthetic) and to represent one of the most effective forms of green infrastructure for this scheme. Green walls may be constructed which are suitable for a softer / more traditional architectural approach (e.g. Ivy), or suitable for a more modern / industrial architectural style, and could be designed so as to be capable of both treating emissions from the car park deck and of intercepting/absorbing pollutants from the local road network (and so positively influencing the background air quality).

Some consideration would be needed in design to ensure that such a feature is not antagonistic to the need for internal ventilation.

Alternatively, the proposed expanded mesh lath panels may provide a favourable substrate for a photocatalytic coating which (targets Nitrogen Dioxide pollution, and-) works best when air is allowed to pass through the treated panel (increasing surface area & contact time), and where the panel is exposed to both natural UV light and precipitation (to regenerate the photocatalytic substrate). The proposed use of lath panels would appear compatible with deployment of a photocatalyst and such materials would be appropriate given that the development itself represents an elevated pollutant source (e.g. local emissions to air would be treated on egress from the parking deck).

It could be argued that such approaches would also contribute to design policy E2 d) ii) (enhancing the public realm), and E1 g) (incorporate new technologies). Whilst design changes appear likely to be required, it may be worth seeking enhancement of the sustainability credentials of the scheme.

Mr. Jonathan Driver
Environmental Control Officer