

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/19/01219	Your Ref:	APP/18/00450
EH Case Officer Extn:	44 6677	Date:	19 July 2019
DC Case Officer:	Lewis Oliver		
DC Case Officer Extn:	44 6263		
Application Number:	APP/18/00450		
Site Address:	Forty Acres, Havant Road, Havant, PO9 3LW		
Proposed Development:	Erection of 320 dwellings (including a 30% provision of affordable homes), 66 bed care home, provision of public open space, habitat mitigation zone, allotments, closure of existing access and creation of 2 new access points and associated infrastructure following demolition of existing buildings.		
	RECONSULTATION REQUEST for revised plans and/or documents received		

Observations / Comments:

I have read the revised documentation which is notably extensive. Subjects covered in this response will be broadly as in the original consultation (our ref CONS/18/00932, 07/06/2018). Charlotte Adcock has been allocated the case to review with regards to amenity / nuisance, and further comment on received from Environmental Health under separate cover, if needed.

Public Objections;

Broadly as previously, though I note that several respondents have raised concerns about the pumping station and ground levels relative to properties at Westways. A brief comment will be provided under 'drainage strategy' below.

Gas Pipeline;

Revised documentation does not address this feature specifically. No further comments

Flood Risk Assessment and Drainage Strategy;

I have not reviewed the levels strategy documents again in detail. It is anticipated that the LLFA &/or EA will raise any pertinent concerns under this application or the APP/19/00374 application as regards levels & surface water management issues.

The revised documentation does include amended surface water / SuDS details, and a brief review has not identified any features or changes which would materially alter my previous advice (that the pollution control aspects of the scheme are adequate).

Environmental Health does have public health responsibilities for the proper functioning of private sewers (surface water and foul). Whilst Southern Water is clear that SuDS systems (and networks upstream of SuDS features) are not adoptable; no specific comment has been made on whether the applicant has approached the undertaker to explore the prospects of securing a

positive adoption decision on the foul sewer system. Southern Water simply state that infrastructure, which I would take to include the pumping station, should be built to adoptable standards to avoid prejudicing a future s104 WIA'91 agreement. I note that the planning documents do not make explicit reference to the intended future status of the foul sewer, and so it is possible that the system could remain private.

Pumping stations are regarded to be infrastructure that is both critical, relatively high maintenance, and as a result, relatively high risk. Adoption of the system would be the preferred outcome. With reference to the public objections, I note that ground level contours appear to show that a surcharge flow from the station is likely to be directed toward the Southwest, some distance from existing residential properties at Westways or the nearest assumed field drainage feature.

I am pleased to see that the drainage layout plans all indicate that "All construction" will be "...in accordance with Sewers for Adoption 6th Edition & Interim Addendum and the specific requirements of the Sewage Undertaker", and I note that Southern Water has requested a pre-commencement condition for prior approval of both foul and surface water drainage layouts.

I would support this recommendation and expect that the 'proposed means' of 'foul... sewerage disposal' should be taken to include the technical details of the pumping station, the intended future status of the facility, and an illustration of likely (or design) surcharge flows under pump failure conditions (in a similar manner to the surface water exceedance flow plan).

I do not see (however) that this is a matter material to the principle of development, and so would be appropriate to deal with under the condition proposed by Southern Water.

Transport Assessment;

Several material revisions have been made to the modelling and improvement scheme, in response to comments made by Hampshire CC, Portsmouth CC, and Highways England. The work has apparently been undertaken in consultation with HCC at least, and it is clear that some independent parallel modelling work has also been undertaken unilaterally by HCC.

I note that baseline flows (junction saturation) have been revised upward in the most part, and that overall development impacts remain proportionally adverse. The most significant revised flows do not relate to the junction arms most sensitive to the air quality impacts that can arise from disproportionate traffic flow effects (amplified delay, turning conflicts etc.). In this respect, the revisions to flow model are non-material to the air quality assessment.

It is noted that Hampshire County and Highways England have informally agreed that the adverse impacts on junction arms following the amended modelling exercise (which increased both baselines, and development impact) was sufficiently minor. A new package of measures has been proposed, which include improvements on the 'cycle to school' route to Bidbury Schools - inclusive of a new shared surface with crossing points at existing traffic signals and consequential junction amendments at the Rusty Cutter roundabout to facilitate a safe route around south circulatory.

Qualitatively, it would appear that the South Circulatory shared surface scheme is necessarily extensive (in order to achieve safety through use of crossing points synchronised with stop-phase of existing signalised junction arms), and arranged so as to best serve the Eastern end of the development. For other occupants, the North circulatory route may prove to be shorter / more convenient (albeit not achieving an equivalent degree of safety).

The route is also not ideal from a desire-line perspective, and it is foreseeable that pedestrians might be tempted to take a shortcut to join existing pedestrian facilities on the south side of Bedhampton Hill; more so than might be the case for cyclists for whom the additional distance is less problematic, and where the guardrail would present a more effective barrier to crossing with a cycle.

The scheme is recognised achieving safety improvements (over the North Circulatory Route) for access to destinations to the east by modes of active travel. An alternative scheme of improvement to the pedestrian / cycle route around the North Circulatory could however much better serve the existing residential areas of Glebe Park / Auriol Drive and so deliver a far wider benefit in terms of making active travel a safe and convenient option for local residents.

It is unclear whether an alternative (e.g. providing a permanent crossing on North circulatory route at the A3(M) northbound onslip) has been costed and discounted as being cost prohibitive. Whilst it may not be appropriate for the proposed scheme to wholly carry such an improvement, it would highlight that the suggested scheme would omit the need for alterations to several signal sets, the lane modifications, and around 350m of new surfacing & guardrails; and (being of broader use) could offer better aggregate value.

Whilst E23 remains a draft policy, it does not yet carry material weight and so it is not appropriate to call for exploration on grounds of Air Quality alone in the absence of a material detrimental air quality impact at a specified receptor (the Air Quality Assessment does not identify such a receptor). There may however be other planning reasons why the proposed package might be dis-favoured - and so it was considered worth presenting an opinion on the package of off-site highway improvements.

Travel Plan;

I have reviewed the revised travel plan in full, which has been revised in response to consultation(s) with Hampshire County Council. I note that the objectives have been revised to be more site-specific, and that an alternative 'cut' of census data has been used to provide more granular estimates of baseline mode-share.

This revised baseline is translated in to more local & detailed mode-shift priorities, which are further enhanced by an upward revision of mode-shift targets. This serves to both reduce 'headroom' (by reducing over-estimation in allocated baseline private motor-car mode-share) & significantly increases the % shift target.

Paragraph 7.20 appears to create a financial incentive for implementation (by return of bond), which is a novel- and probably helpful- provision. Overall, the travel plan is considered to be materially improved, and is supported.

My only criticism would be that the report is sceptical about achieving generally accepted minimum survey response rates for surveys following the initial baseline setting; suggesting that it would be appropriate to adopt a minimum target of 10% (from recommended minimum 30%). At this level, there is significant opportunity for a skewing of 'actual' mode share, arising from a degree of self-selection in the respondent sample (e.g. those motivated to respond will be those that care about travel, air quality, health and/or sustainability, etc.) and an amplification of that effect by the small proportion of residents represented by the sample. The acceptance of such a low response rate risks undermining an otherwise comprehensive and challenging Travel Plan.

Solid Fuel Burning;

The revised documents include an updated chimney plan but does not address the uncertainty over (it's/their) function. The air quality assessment has not considered domestic sources, and so it is assumed that a (selected units-) site-wide domestic solid fuel provision does not form part of the proposal.

Air Quality (assessment of impact);

I have reviewed the revised Air Quality assessment in full and note no material changes. Amendments largely reflect national policy changes.

It is however worth commenting that since Environmental Health's original comments, the Council has sought to confirm modelled exceedances of National Air Quality Strategy (NAQS) Objectives for Nitrogen Dioxide within the baseline year (at receptor R1). The results indicated that ambient concentrations at baseline were likely to be closer to those estimated for the 2028 'do nothing' scenario than to the 2016 baseline year - the result of this is that the proportional development impact would be elevated, but at the same time the risk categories are likely to be downgraded.

There are two postulated reasons for this disparity, one is that the 'real-world' baseline measurement is positively influenced (concentrations reduced) by the presence of highway marginal vegetation, the other is that the model has been inappropriately verified against monitoring points influenced by local sources - as described in my previous comments. Both may be material factors.

There are no material comments to make following the revised assessment other than to conclude that roadside margin vegetation may be a significant factor mitigating the impact of road-traffic pollution in this area, and that the landscape scheme should retain as much existing vegetation as possible. There does not appear to be any substantial loss proposed, and so this comment is intended to provide context to any future revisions.

Air Quality (mitigating impact);

I had previously queried the 'indicative' electric-vehicle charging points plan. I note that the "amended proposed bin & cycle storage plan" submitted (or at least logged against the application) is still dated April 2018 and differs from the Electric Charging Point Plan PL16 (Jul 2019). It is assumed that the latter constitutes the proposal.

PL16 shows reduced charging point provision from around 235 to around 90, representing a 60% reduction. In the context of emerging policy IN3, a reduction is justifiable - however I have not found reference to the provision of suitable infrastructure to accommodate future expansion of the initial charge-point network, and I am disappointed to see that no provision is made in unallocated / visitor parking areas.

I fully support the provision of EV charging facilities as a key measure for mitigating the (emissions / air quality) impact of the proposed development travel demand in the short- to medium- term. I would recommend however that;

- The Council seek additional technical details as regard the infrastructure design - including the appropriate sizing of the sub-station serving the development, and the network's flexibility for future development (by others), and;
- the provision of visitor-space charge points is secured (e.g. through engagement of- / providing space for- a national charge-point network provider to commercially offer recharging services)

It may be appropriate in light of emerging policy to seek to secure this additional detail (of proposed elements) by means of a suitable condition.

Contamination;

Revised documentation does not address this feature specifically. No further comments

Mr. Jonathan Driver
Environmental Control Officer