

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/19/00200	Your Ref:	APP/19/00007
EH Case Officer Extn:	44 6677	Date:	20 February 2019
DC Case Officer:	David Eaves		
DC Case Officer Extn:	44 6549		
Application Number:	APP/19/00007		
Site Address:	Camp Field (land to the west of Havant Crematorium), Bartons Road, Havant		
Proposed Development:	Outline Application for access with all other matters reserved, for up to 72 new homes plus associated green infrastructure including community orchard		

Observations / Comments:

I have reviewed the draft scheme & supporting documentation. Being an essentially greenfield site, I have no contamination concerns. I have reviewed the Flood Risk and Surface Water Management Strategy, and have no specific concerns in relation to the pollution provisions.

Comments relate principally to the assessment of transport impact (and by extension, air quality).

Transport Assessment (Routing model, magnitude & location of impacts; Air Quality)

It is understood that land to the north of the proposed development in the East Hampshire Area is to be safeguarded for further development of up to 78 dwellings, with access to be taken via the proposed 72 dwelling development. It is noted-, and agreed to be appropriate that the transport assessment assess the potential impact of the whole development allocation taking it's principle access from Bartons Road.

To a large extent, acute impacts to the highway (e.g. peak period congestion) are a matter for the local highways authority. Public Health interest would typically be focussed upon the overall change in transport emissions resulting from the development, as it affects the average day, and by extension, the average year. The exception to this would be where queuing traffic at a congested junction blocks turning movements, leading to a disproportionate impact on the existing traffic flow, or leads to aggressive gap seeking & a disproportionately elevated local emissions. These impacts may occur at some distance from the development site.

The trip rates agreed with Hampshire County Council provide for 357 vehicular trips/day associated with the completed 72 dwelling development, and 745 vehicular trips/day for the proposed (HBC) + likely future (EHDC) development areas. The latter figure forms less than 10% of the current flows on Bartons Road, and would therefore normally be screened out from requiring a specific Air Quality assessment.

The assessment accounts for committed local development (land North of Bartons Road, and Land South of Bartons Road), and accounts for 'other local development trip pressure' through the use of TEMPRO generated NRTM growth factors. It is worth noting that the NRTM factors represent travel demand growth primarily as *development related growth*, and do not represent *acceptable growth without need for mitigation*. In this way, assessment of the proposed development trip generation against the 'natural' growth provides a measure of proportionality, and not acceptability *per se*. It would be erroneous to consider the development as being divorced from this 'natural' growth.

On this basis, I would challenge conclusions that junction capacity issues arising from the projected 'natural' traffic growth are systemic problems which the development need not contribute to mitigating. All new residential development is considered to contribute travel demand which is new to the local road network, and so all new residential development contributes to this growth.

The report concludes that no material impact at either the Emsworth Road / Southleigh Road, Emsworth Road / Bartons Road, or the Barton's Road / Petersfield Road Junction; with all three predicted to operate within the benchmark capacity (0.85 RFC) in 2023 accounting for proposed (HBC & EHDC) & committed development.

The report concludes that the Bartons Rd. / Comely Hill / Horndean Rd. / Emsworth Common Road Junction (the "B2148" junction) is operating at just above the benchmark under 2018 observed conditions, and approaching its theoretical limit under the 2023 baseline scenario. The 2018 result is as expected given local knowledge of the junction, and the length of Queue's that are currently anecdotally reported. It is noted that the observed Queue reported in Table 6.4 (cited as verification of the model estimated Q's) is substantially adrift of the maximum observed Queues reported in appendix B (7.9 PCU, x 4.9m average vehicle length = 38.71 vehicle length metres, vlm [reported in table 6.4], max recorded 130+ [as vlm]). This is important as the tabulated observed queue length is used to verify model performance, and the anticipated length of queues is material to the saturation of available stacking lanes for particular turning movements (beyond which, disproportionate queuing response might be expected).

It is notable that the assessed Bartons Road right-hand turn (RHT) queue is under-represented cf. the maximum observed as the 130m+ observed exceeds the available stacking for this turn (ca. 105m), and exceeds the distance to the Eastleigh Road Junction (ca. 127m), potentially interfering with Eastbound RHT to Eastleigh Road and the LHT to Comely Hill. It is also notable that the maximum observed queue on Emsworth Common Road is around 75m (vlm) in the PM peak - I have known the traffic on this junction arm to queue in a Westbound direction to well over 200m (to Southleigh Landfill Entrance). The report may be referring to '*average queues*' and not to '*maximum queues*'; if so, the above should serve to illustrate the difference that should be expected between a modelled average queue and the queue's likely to be experienced during peak periods in practice.

The report argues that the development contribution to peak flows at this junction falls within the 'general daily variation'. I would not disagree that the general daily variation at the junction may exceed this value (i.e. > +/-8 PCU), however it is relevant to stress that the general daily variation will not be reduced proportionately to the addition of development traffic, and that the daily variation does not provide 'capacity' which the development may consume, or within which the impact is acceptable.

The additional trips will elevate the average base flows (daily, and peak period) around which the daily variation occurs. In this way, the frequency of occurrence of congested conditions will increase proportionately, as will the average emissions associated with the junction (and its sphere of influence as regards queuing etc.).

I note the relatively low proportional trip allocation given to this junction, and in particular to Emsworth Common Road (21% & 5% respectively). It is unclear what destinations were accounted for in making the distribution decisions, but as a route to Chichester which avoids the notably congested A27 roundabouts, it is considered possible that agreed routing bias disproportionately favours the National Trunk Road network for destinations to the East, routing via Eastleigh Road.

It appears that the routing bias presented in Table 5.3 may have been taken directly from a third party transport report. I assume that 'left & dissipates' (considering that the routing model is derived from travel to work data) refers relative to this development to 'outbound right turn' trips travelling South via New Lane, and North via Wakefords Way (otherwise this traffic should be considered as an impact to the B2148 junction).

The transport assessment gives cause for concern about emissions at a road junction which to date has received little attention from an air quality perspective, but is now located within a strategic development area.

The comments above are not intended to 'pin' these problems specifically on the proposed development, rather they are made in order to assist in framing the context of arguments made within the report as to the impact being 'negligible' (and therefore not justifying any mitigation or acknowledgement of contribution to problems which are framed as 'systemic').

It is also to flag the capacity & queuing issues which exist in relation to this junction even without accounting for the delivery of the STR1 allocation, and the likely need to consider air quality specifically as a result of the cumulative air quality impact at the B2148 junction as a consequence of development allocations. Each local development will contribute to the impact at this junction, and it could be argued that each should consider proportionate mitigation under policy DM12.

Key receptors as regards air quality impacts of traffic associated with this (and committed & allocated) development in the vicinity are primarily anticipated to comprise;

- Gravel Pit & Badgers Cottages, Emsworth Common Road (exacerbation of existing emissions pressure where stationary queuing traffic are common)
- Home Farm Barn, Eastleigh Road (relevant facade at the kerbside, 33% traffic routing)

It is accepted that the impact of this individual development is not likely to materially impact local air quality as defined under the NSCA guidance 'planning for air quality', though it may contribute to a foreseeable cumulative material impact in the medium term.

Design, and Emerging Policy (Environmental)

Given the scope of matters that may be reserved, I am unclear as to when the opportunity to secure design features relevant to air quality (and other environmental matters) should properly be exercised. Given this, approval of outline consent without considering these matters fully may miss the opportunity to exercise 'air quality relevant' policies to secure a development which has excellent sustainability credentials (a key means through which the Council is able to seek to secure general incremental improvements in local air quality).

I note that the development does not make any specific provision for low or zero carbon energy, renewable contributions to space heating, infrastructure to support charging of electric & plug-in hybrid vehicles, minimising the use of domestic combustion, or specifying ultra-low-NOx appliances. Many of these design elements are represented within emerging policy and are relevant to the national policy direction reiterated in the revised NPPF that local policy should

'sustain compliance' with national objectives and 'where possible, improve' local air quality.

The application does not refer heavily to emerging policy, other than to establish the acceptability of the principle of development by reference to the H21b allocation. In consideration of the outline status of the development, the emerging policy may gain additional material weight in the period between granting outline and seeking reserved matters.

A number of the policies refer to design matters relevant to the environment (the contribution of design features, transport / parking, and infrastructure to air quality goals in particular, but also contribution of services to carbon and air pollution aspirations). In this context, it is considered the designers should have regard to emerging policies IN3 (EV charging) & IN4 (Access to Classified Road Network), as well as environmental policies E1, E2, E12, and E20-23.

Policy IN3 is particularly relevant given the comment at 6.11 of the Outline Travel Plan (*'promoting new transport technologies'*), where I would take 'promoting' to mean *'facilitating and encouraging'* and not simply *'publicising'*. An interpretation along the lines of the emerging policies could be applied to extant policy under CS14, CS16, DM11 & DM12, among others.

Off-Site Mitigation

Section 8.1 acknowledges that mitigation works could be justified (in highways impact terms) on the basis of enabling appropriate provision for sustainable travel modes.

Consideration is given in the transport assessment is principally framed in terms of the direct highway impact for motor vehicles, dismissing 'severe', or even 'material adverse' impacts on this basis. Coupled with the recent, and committed improvements to pedestrian and cycle facilities on Bartons Road (associated with committed development), the report argued that no mitigations are therefore justified.

Justification for such measures could however be argued to include aspirational measures to contribute toward the achieving of policy aims under DM6 (Coordination of Development, specifically with reference to 'consumption of residual capacity at road junctions, and in terms of emissions capacity before NAQS objective limits are met); DM11 (Planning for More Sustainable Travel), DM12 (mitigating the impacts of travel), CS1(Health & Wellbeing, particularly (7) &(8)), and CS11 (Protecting... the Environment...; with respect to the impact of transport on habitats & water bodies (2)).

It could be argued that mitigation either undertaken or committed in connection with the approval of nearby development on Bartons Road should not have simply created 'capacity' to accommodate this development, and if there is no remaining local deficit in infrastructure, it may still be appropriate to identify proportionate off-site improvements which directly benefit residents of this scheme.

Travel to school is considered to a key journey with respect to opportunities for modal shift. The travel plan acknowledges this at 7.13, recognising the importance of encouraging active travel to school, and of local community schemes such as the 'walking bus'.

The site audit referred at 6.1 of the transport assessment is agreed to be constructive, as this is likely were off-site improvements might be most productively and justifiably deployed. In line with the comment above as regards matters which may be reserved - I am unclear as to when, in planning terms, it would be most appropriate to seek to secure such assessment &/or agree the delivery of improvements.

Summary

No objection in principle to the granting out outline consent. I do not entirely accept the assertion that the impact of development is negligible, but would agree that it is not significantly adverse when viewed in isolation. It is worth noting that the transport contribution of the consented development at 'Land South of Bartons Road' was borderline in triggering a requirement for an air quality assessment, and that development + this proposal would exceed the NSCA screening criteria (and it must therefore be concluded, in combination have potential to materially impact air quality at a relevant location).

Cumulative impact could be accounted for (and proportionate mitigation sought) under a variety of extant and emerging policy. The sustainability credentials of the draft scheme are not strong, so there is an argument for this. Ultimately a planning decision - I will not object on air quality grounds, largely due to the relatively low quantum of the development which is 'on the table'.

No adverse comments as regards contamination or pollution matters concerned with SuDS.

Mr. Jonathan Driver
Environmental Control Officer