

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/18/02281	Your Ref:	APP/18/01033
EH Case Officer Extn:	44 6677	Date:	23 November 2018
DC Case Officer:	Lewis Oliver		
DC Case Officer Extn:	44 6263		
Application Number:	APP/18/01033		
Site Address:	Land East of, Castle Avenue, Havant		
Proposed Development:	Site Address: Land East of, Castle Avenue, Havant Proposed Development: Residential development comprising 69 No. dwellings with access from St. George's Avenue together with access, car parking, landscaping, electrical substation and associated works.		

Observations / Comments:

I have reviewed the supporting information to this application, and would like to make some comments in respect of Ground Contamination, Drainage, Transport Assessment (Impact of Transport) and Air Quality - the latter being closely related. I am aware that Mark Moss has been allocated that application for review of information relating to noise & lighting, and in these respects, further comment may be made under separate cover.

Contamination

The application was supported by a general combined Environmental Desk Study, Phase 2 site investigation and geotechnical assessment. I have reviewed this document, and agree it's findings. No environmental risks have been identified, and I further note the volume of shallow excavations currently planned in support of the site's surface water drainage strategy, which will serve to minimise the quantity- or negate altogether the need to- import topsoil to the site to dress garden areas. As a consequence, I see no need for ground conditions to be considered further, and I propose no conditions, requirements, or informatives in this respect.

Drainage / SuDS

I refer to the LLFA to comment on flood risk, and the adequacy of calculations relating to runoff rates, required storage volumes, and controlled discharge rates. I note that at 6.4.5 the Flood Risk Assessment indicates that *'suitable infrastructure will be provided within the detailed design to meet the target treatment level'* (to ensure good water quality). Whilst residential developments are acknowledged to be low risk, some form of pollutant interception retention (and destruction / treatment) is needed, and at this stage it is unclear how this is to be achieved.

The Landscaping proposals do not appear to have provisioned for 'green' features to serve this function. Given the apparent 'draft'/'in principle' nature of the design solution presented at this stage, it may be necessary to condition the detailed design and layout of the drainage system under a prior to commencement clause.

On design, I note that the runoff requirements & existing sewer depth constraints call for >800sq.M (485cu.M) shallow crate attenuation / storage. It appears to be a missed opportunity not to consider use of harvesting (which would represent storage capacity which does not require gravity drainage to public sewer from it's lowest point, and so can be installed below the sewer connection invert). This would represent good sustainability credentials, and could substantially reduce the need for crate drainage capacity (though not eliminate the need entirely). Design or Sustainability policy could be invoked to justify such a suggestion if Development Management were minded to make it, though I acknowledge that the strength of need for a highly sustainable development is related to the proposed quantum relative to the capacity which the draft allocation has assessed as being sustainable at the plot.

Transport Assessment & Air Quality

The transport assessment has not followed the pre-application recommendations of Environmental Health, and consequently no total (daily) traffic increase estimate has been presented. I have made some rough estimates using 7-day ATC data the A259 for peak>12 hour correction factors, and have used Hampshire Highways 12-hour>AADT and Seasonal correction factors to generate existing flow estimates from the peak period turning count data presented.

The TRICS data presented at Appendix G includes an average 12 hr trip rate, to which Highways conversion factors may be applied to derive daily generation estimates.

I note that the routing model applied is in conflict with the junction assessment and text of the document - and would consider that as a result of the observed queue lengths surveyed that development traffic is likely to favour the Warblington Avenue route to access the Strategic Road Network (A27) or Destinations to the West (e.g. Havant Town Centre). This route avoids the peak period junction blocking which is shown to affect both the Castle Avenue junction (~69% traffic assigned), and St Georges Avenue / Southleigh Road junction (~30% Traffic Assigned). The routing model assigns no traffic to the Warblington Avenue route option.

The reasons for favouring the Warblington Ave. route are important, as this junction has a number of 'relevant receptors' (with respect to air quality) close to the kerbside, represented by #39 Warblington, and at least Two named properties at the North end of The Gardens, all within 3.5m of the kerbside.

Whilst I would agree with the statement within the Transport Assessment that the development is unlikely to materially impact the local highway (junction capacity at peak periods) *in it's own right*, I am acutely aware of the residential allocation of the draft local plan referenced (or formerly referenced) UE02a, adjacent. This allocation is entirely isolated from the local road network other than via the development currently proposed, and can therefore be thought of as a 'phase 2' to this development. That allocation is for 260 dwellings, which as the current applicant points out, is a likely to be regarded as a conservative quantum.

Based upon the TRICS estimates & modal split provided for within this application, a reasonable estimate of new development related trips by private motor car represented by this application and the adjacent draft allocation would be in the order of 1686 journeys (accounting for inbound & outbound trips) on the average day. On the routing model presented, this value exceeds the 10% traffic increase screening threshold whereby an air quality assessment is required. I am unconvinced that the routing model is realistic, and consider that a bias towards Warblington Avenue is more likely, where relevant receptors are closest, and where the magnitude change in local air quality may well be of sufficient magnitude as to require a degree of mitigation.

With this in mind, whilst the current proposals are agreed not to represent an unacceptable adverse impact upon local air quality in & of itself - it will materially contribute to the air quality impact of the wider development at land East of Castle Avenue, which is presently unaccounted for within the development proposals.

I do not make any specific recommendations at this time other than for development management to consider what might represent a proportionate and appropriate response to this presently unquantified risk.

As regards the landscaping proposals, I note that there is fairly liberal use of native species in green boundary treatments at the site, alongside the specification of some ornamental specimens which will reach a reasonable size. These aspects of the landscaping proposals are considered likely to represent a small but positive contribution to local air quality, and to positively contribute towards the development's fulfilment of CS16(6).

Mr. Jonathan Driver
Environmental Control Officer