

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/19/00383	Your Ref:	APP/18/01033
EH Case Officer Extn:	44 6677	Date:	14 March 2019
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:	Residential development comprising 69 No. dwellings with access from St George's Avenue together with access, car parking, landscaping, electrical substation and associated works.		
	RECONSULTATION REQUEST for revised plans and/or documents received further details, as detailed below;		
	• Transport Technical Note - Mode Transport Planning Feb 19 • Construction Environmental Management Plan • Drainage Note		

Observations / Comments:

I have received the submitted additional information, and would like to make brief comment with respect to the Transport Technical Note, CEMP, and Drainage (as regards pollution control). Mark Moss will be reviewing the acoustic assessment, and will comment under separate cover.

Construction Environmental Management Plan (CEMP)

Generally speaking, this document is comprehensive in scope, and detailed. Adherence to the procedures and practices outlined should result in a development phase which has minimised impact upon neighbours and the environment.

There are just a couple of observations - I note that the proposed hours at 2.1 are from 07:30am; our recommendation would ordinarily be from 8:00am for noisy operations, as experience shows that complaints are more likely for activities before 8am. Ideally this should be reflected in the CEMP.

I also note the somewhat ambiguous language used at 2.2 in relation to Sunday & Bank Holiday Working ([no activities on Sunday / Bank Holiday] '*...unless circumstances dictate otherwise*'). The text implies that this is a lower standard than that indicated for continuous 24hr activities (in emergency only), but is unclear on what circumstances are considered within scope.

This text could affect Environmental Health's assessment of 'reasonableness' and 'best practicable means' when considering legal tests for nuisance or Control of Pollution Act noise enforcement. For clarity, Environmental Health would not accept inclusion of circumstances of 'commercial imperative' (i.e. contract deadlines, and penalties) to be reasonable exceptions. Operational imperatives relating to construction techniques, activity impact minimisation, or

emergency requirements would however be considered acceptable exceptions. It is considered implicit that hours refer to 'noisy operations', and not to the presence of staff on site undertaking quiet activities not audible beyond the boundary of the site.

Drainage Note

The note at point 3) is acknowledged. It is agreed that the site represents a low pollution hazard in accordance with table 26.2; with an index of 0.5 / 0.4 / 0.4 (the higher of residential roofs, and individual property driveways).

It is unclear whether the applicant views the system of catchpits and attenuation tanks as 'proprietary systems' or as a physical 'detention basin' (settlement). The former has no defined 'index score' (requires specific assessment), and the latter provides adequate index scores (0.5 / 0.5 / 0.6)

I would point out that physical settlement and periodic cleaning is likely to be effective for suspended solids (including particulate metals) it is not likely to be effective for dissolved-phase contaminants (metals, hydrocarbons, phosphates & nitrates), or for necessarily for LNAPL (solvents, fuels, oils).

It is not clear that the index approach is intended to regard standard traps as 'proprietary' - ch.26 makes reference to ch.14 for advice on demonstrating suitability, and table 14.1 (description of types of proprietary systems) only refers to separators, filters, bioretention and treatment devices.

It is similarly not clear whether all of the pollutant reduction benefits of an open, vegetated (soil substrate-) detention basin would be achieved by traps and storage tanks, as below ground engineered elements (traps and tanks) lack the biological activity, the UV exposure, and the sorptive substrate capacity that would characterise the former.

I would expect the LLFA to respond along these lines, but I am aware that it's priority is flooding (and not pollution), so thought that it was worth highlighting that the applicant probably hasn't done enough to show that downstream water quality is unlikely to be affected by domestic inputs.

Transport Technical Note (Air Quality)

Four junction assessments are presented, to test 3 mitigation scenario's against a 'no change' scenario. Options including an improvement to flare length appear to result in an overall benefit to the function of the 'linked junction model', with the majority of the benefit affecting queue lengths on Castle Avenue (Emsworth Road, East [ERE]).

The model uses the trip distribution model presented in the transport assessment, and so ignores Warblington Avenue. Authors refer to this alternative route at 5.8 as being a significant source of uncertainty (inaccuracy &/or unrepresentativeness of the model), with which I would certainly agree.

Mitigation options 3 & 4 serve to limit turning movements-, or restrict all access- to Castle Ave (ERE) respectively, and so serve to 'push' development traffic to use alternative routes. The model does not account for this route diversion, and does not assess the impact of turning movements at the alternative junctions (Emsworth Road/Warblington Ave., and Emsworth Road/Southleigh Road). I consider Warblington Avenue to be likely to be a favoured route, and it is noteworthy from an air quality perspective that this junction has 4 no. properties which are

sensitive receptors, which could be adversely affected by the impact of turning movements at this location (associated with the current scheme, and the larger allocation to the East, which will utilise the same route for access).

It is clear that all mitigation options benefit the Castle Ave. (ERE) link queuing / delay disproportionately, and also that the development traffic contribution (accounted for) does not disproportionately impact flows on Emsworth Rd. The results are also fairly clear that turning restrictions at Castle Ave. (ERE) do not offer significant benefits over an improvement in flare length (Option 2).

In relation to mitigating the air quality impact of development traffic, it is not considered to be desirable to close the Emsworth Road East>Castle Avenue route from Emsworth Road, as to do so would ensure that all development traffic routes past Warblington Avenue, and a significant proportion may utilise Warblington Avenue as the principle development access.

Modelling indicates that the predicted number of vehicles waiting to make a RHT to Castle Ave (ERE) does not exceed the stacking capacity of the RHT lane, and so does not block Westbound traffic exiting the roundabout (on Emsworth Road, travelling toward Havant). The Road width at Warblington Avenue is just under 6.5m, and may be insufficiently wide as to allow Westbound traffic to pass vehicles waiting to make a right-hand turn. If waiting vehicles push over to the centre of the carriageway to allow Westbound vehicles to pass, it may narrow the available carriageway width for Eastbound traffic, so as to cause it to excessively slow - i.e. encouraging development traffic to use this junction could impact the existing / base flow on the local road network.

For this reason, it is considered desirable to allow at least some traffic movements between Castle Ave (ERE) and Emsworth Road (West, and South) (i.e. Options 2, or 3). The benefit of some mitigation is accepted (i.e. Option 1 is not desirable, and junction improvements should be considered, whether in isolation, or as part of the STR1 infrastructure scheme).

If Option 4 is preferred by Hampshire Highways in the short-to-medium term, then consideration should be given to the impact of turning movements at Warblington Avenue on traffic flows on Emsworth Road.

The conclusions of the technical note favour Option 2, and make clear that the purpose of the technical note was to define the level of an 'appropriate and proportionate' contribution to junction improvement works to be taken forward by the Highways Authority.

In this way, the above assessment may be purely academic - but it does serve to indicate that Air Quality may well be material to the development of the allocation to the East of the current application site, and similarly with respect to development within the strategic development area under allocation STR1.

The conclusions of the technical note can be supported.

Mr. Jonathan Driver
Environmental Control Officer