

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/18/00732	Your Ref:	APP/18/00244
EH Case Officer Extn:	44 6677	Date:	15 May 2018
DC Case Officer:	David Eaves		
DC Case Officer Extn:	44 6549		
Application Number:	APP/18/00244		
Site Address:	Colt International Ltd, New Lane, Havant, PO9 2LY		
Proposed Development:	Outline application for access with all other matters reserved. Mixed use development comprising up to 100 new homes, including up to 40% affordable, 2860 sqm of employment floorspace and improved access onto New Lane and Martin Road. On-site parking for residential and employment uses. Landscaping to be provided, including acoustic bund to rear of employment units and naturalisation of existing watercourse (full details to be submitted at a later stage).		

Observations / Comments:

I have reviewed the new & revised WYG assessments, and would like to make some brief comments. I am unclear on whether this application is for access (to serve an assumed development quantum of 100 dwellings / ~2900 sq.m employment), or a hybrid application (detailed for access, outline consent for the development quantum); which obviously affects the appropriate consent to seek conditions.

As there were no detailed junction layouts, and the accesses are essentially the extant highway access points; I have reviewed the application as if it were the latter (Outline for quantum), and will make recommendations on this basis.

Air Quality, Transport & Travel

Transport & Parking

The full traffic survey data are not presented. The extrapolation of peak flows to the road network follow a simplified / idealised model which is clearly related to the survey data, but the detailed procedure (assumptions) is unclear. From the peak flows presented, the AADT estimates and routing biases presented in the air quality assessment would appear to be not unreasonable.

It is noted that all junctions modelled in immediate vicinity of the site (bearing the greatest impact from the development travel demand) retain ample spare capacity under all scenario's.

I agree that the site is adequately served by public transport - Havant train station is within a reasonable walking distance, and bus stops are located within 250m of both site entrances, and are reasonably served by local operators. Low-carriageway speed routes are available for cycles,

and the site is close to NCN routes. The concept of the development, in seeking to co-locate businesses (services & employment opportunities) with residential property; is compatible with local and national policy, and is in and of itself a measure for reducing the need for travel. In this way, the development would appear well situated, and I would have no adverse comment to make on the 'in principle' scheme, especially as it is noted that the applicant is proposing a monitored travel plan to further mitigate the new travel demand represented by the residential element of the scheme.

As regards parking - the site is not considered to be so well situated / served as to justify seeking a <SPD parking provision, and it is recognised that in order for businesses to be successful (and to co-exist amicably with their residential neighbours), adequate provision for staff & customer access is necessary in order to avoid overspill parking on the public highway or private roads. I do not object to the ~+15% (cf. SPD) commercial provision, or the marginal >SPD residential provision made; though it does serve to illustrate the need for a strong employment travel plan in order to avoid the generous parking provision serving to encourage employee single occupancy vehicle trips.

In terms of the cycle parking/storage provision for residences, the outline proposals appear reliant upon properties with ample sized garages, and with gardens large enough for secure sheds (to be provided). This cycle storage provision will need to be readily accessible if the choice to adopt sustainable and active travel is to be made as effortless as possible for residents (thus maximising the probability of residents choosing to cycle, or choosing to cycle more frequently). I note that a good proportion of properties on the indicative Masterplan are terraced, and I would point out that cycle storage which requires the carrying of a cycle through the dwelling is unlikely to be regularly used.

I would strongly recommend that detailed designs coming forward take accessibility in to account, and not just the physical space required to store a cycle / cycles.

Travel Plan

The travel plan is relatively generic, arguably with a bias toward the residential element of the scheme. Mode shift targets are common (apply for residential & commercial elements), seeking -10% (reduction) in single occupancy vehicle trips. . Monitoring & oversight is proposed to be through HCC, and the success of the scheme will be reliant upon both the s106 provisions to secure funding to implement and oversee the plan, and the HCC Travel Planning officer to engaging with the Travel Plan Coordinator to drive measures to improve mode shift in the event of poor performance in years 1-3, or poor survey returns.

Some common measures are notably missing from the options considered, mostly relating to measures targeted at employers / employees - making available a small number of low emission pool cars (for business trips), provision of dedicated car share spaces &/or EV charging bays, and supporting the adoption of an 'employment bias' to locally resident persons (etc.).

I also note that the range of travel info referred to for residents does not include the excellent 'MyJourney' Hampshire site, or make reference to school travel schemes (e.g. modeshift stars, park & stride).

As is always the case with Travel Planning documents - the document is 'live' and may be subject to amendment / development at any stage during it's lifetime - the above are (therefore) recommendations both for the plan, and for detailed proposals coming forward under the future reserved matters applicaitons.

In planning terms, it will suffice to ensure that the travel plan is listed as a document in accordance with which the development must proceed (and/or against which subsequent reserved matters consents will be bound to proceed in accordance with-). It will also likely be necessary to secure a bond as part of any s106 agreement to secure funding for HCC to adequately monitor

the implementation and progress of the plan, and to engage with the coordinator to push for its targets to be met within the lifetime of the plan.

Air Quality

The Transport Assessment only presents trip generation figures on the basis of peak periods. AADT figures are provided within the Air Quality assessment which derive from TRICS data presented in the appendices to the Transport Assessment - equating to ca. 869 2-way trips AADT for both the commercial and residential uses. As the accesses are split (commercial to New Ln, Residential to Martin Rd.), it follows that the trip generation split is around 55%/45% (Residential / Commercial). No HDV/HGV trip generation figures are presented for the commercial element, but I note from the survey data that New Lane already carries >13% HDV, and that the proposed commercial space is unlikely to represent a busy B8 type use which may represent a disproportionate number of HGV trips.

Even before discounting the existing theoretical trip generation rate for the extant (prior lawful) use, the trip generation impact fails to meet the screening criteria of the NSCA guidance, and an air quality assessment would not normally be considered to be necessary.

It is perhaps unsurprising (therefore) that the Air Quality assessment is favourable, even where vehicle fleet emissions rates are (artificially) assumed static (for a conservative / worst case assessment), all results returned indicate acceptable predicted ambient air quality, and negative impacts of negligible magnitude. The assessment itself was comprehensive, considering both PM10 & NO2 emissions at key junctions including areas of known poor kerbside air quality at the Plaza / Havant College Roundabout, and the A27 Havant Bypass Junction.

The NPPF requires that local policy should '*...sustain compliance with and contribute towards [the meeting of current and future-] EU limit values or national objectives for pollutants*'. In the absence of a specific local air quality policy, it is considered appropriate to interpret related policies through this 'lens', seeking measures where possible which serve to achieve incremental reductions in emissions which contribute to declining aggregate rates (i.e. reduce background pollution). The following are design recommendations relating to the final scheme design coming forward, referring to Air Quality relevant policy.

I note that the Landscape consultee is pushing for screening planting along the Northern Boundary to soften the 5 & 4 storey elements. As indicated in the explanatory text to DM8, green boundaries close to roads serve to intercept and absorb road traffic pollutants - for this reason, I support the incorporation of green boundary treatments, protection of extant mature trees, and planting of additional trees for both landscape and environmental purposes. For the purpose of contributing to stripping traffic pollutants from the air, ideally, native tree species should be selected which have moderately dense canopy and round-spreading habit; complemented by native shrubby understory planting or formally laid hedging. Understory planting / hedging is most effective where within around 7.5m of the kerbside (i.e. before too much dilution / dispersion has occurred from source).

I note that the applicant states that they'll be aiming to meet BREEAM 'very good' standard, in accordance with CS14. Emerging policy (E8) would require 'excellent' standard for the commercial element, and whilst the draft plan is not yet adopted, we may have regard to the policy. For air quality purposes, I would strongly support the adoption of a green energy solution as a principal contributor to the BREEAM rating - emerging technologies which have a direct impact on local air quality are ultimately reliant upon green energy to achieve true emissions reductions (as opposed to displaced emissions), and energy efficient space/water heating & ventilation can reduce emissions local to the development by either eliminating or minimising the need to burn fossil fuels (including natural gas) which contribute to local NOx emissions.

It is unclear at this stage whether the suitability of the 3 storey commercial roofspace for a PV installation would be impaired by overshadowing from the 5 storey residential elements. It may be

that the proposed 5 storey residential block would provide an ideal location to avoid overshadowing & maximise output, and that provision may be better targeted here. I also note the BREEAM system allows 'innovation credit', which would include technologies such as sun-tracking mounts for PV arrays, to maximise per-panel output.

There is of course no in principal objection to the proposed development quantum. Indeed, there would appear to be good opportunity to exercise local environmental policy to deliver a high quality development that contributes to the quality of the local environment.

Contamination & Construction Risks

There are multiple potential point source / release points for contaminants at the site that have not been investigated in detail, which the 2017 Ground Investigation Report recommends are subject to a further phase of intrusive work. The preliminary 2017 report has been previously reviewed, and it has previously been agreed that further work required. It is anticipated that further assessment &/or remediation will be secured prior to commencement of significant groundworks at the site (including access roads and infrastructure). To this end, the following conditions are recommended;

Contamination (Standard – omitting EDS / Based upon prior work) [1]

Prior to the commencement of any specific phase of development hereby approved (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), an assessment of the nature and extent of contamination at the site, whether originating from within or outside the curtilage, shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall be undertaken by competent persons, and the findings presented as a written report.

The assessment may comprise separate reports as appropriate, but unless specifically excluded in writing by the Local Planning Authority, shall include;

- 1) An intrusive site investigation based on the results of-, and proposals outlined within- the WYG Ground Investigation and Assessment Report Ref:A090070-182 (June 2017); to provide sufficient data and information to adequately identify & characterise any physical contamination on or affecting the site, and to inform an appropriate assessment of the risks to all identified receptors.*
- 2) The results of an appropriate risk assessment based upon (1), and where unacceptable risks are identified, a Remediation Strategy that includes;*
 - appropriately considered remedial objectives,*
 - an appraisal of remedial &/or risk mitigation options, having due regard to sustainability, and;*
 - clearly defined proposals for mitigation of the identified risks.*
- 3) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the Remediation Strategy (2) are complete, to include consideration of contingency action.*

All elements shall be adhered to unless agreed in writing by the Local Planning Authority

Reason: *Having due regard to policies DM10 of the Havant Borough Adopted Core Strategy [2011] and DM17 of the Havant Borough Local Plan (Allocations) [2014], Contamination may be present at the site as a result of both previous land uses (&/or activities) in areas of the site that have not previously been subject to investigation, that could pose a risk to future residential occupants, to buildings and to controlled waters.*

Verification (Standard) [2]

*Prior to the occupation of any relevant part of the permitted development, any verification report required in accordance with **condition [1]** shall be submitted to and approved in writing by the Local Planning Authority.*

The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan, and must demonstrate that site remediation criteria have been met. Where longer-term monitoring of pollutant linkages is identified as being necessary, the report shall clearly set out plans for monitoring, provision for maintenance, relevant triggers and contingency actions (a "long-term monitoring and maintenance plan").

The long-term monitoring and maintenance plan shall be implemented as approved.

Reason: *Having due regard to policies DM10 of the Havant Borough Adopted Core Strategy [2011] and DM17 of the Havant Borough Local Plan (Allocations) [2014], Contamination may be present at the site as a result of both previous land uses (&/or activities) in areas of the site that have not previously been subject to investigation, that could pose a risk to future residential occupants, to buildings and to controlled waters.*

Regarding Construction risk, I note the concerns of Portsmouth Water. With reference to available BGS records, it is anticipated that in excess of 30m thickness of stiff clays underlie the site (and overlie the chalk aquifer), representing a confining strata which contributes to the productivity Havant & Bedhampton Springs, and which is by definition likely limit hydraulic connectivity of shallow groundwater with the principal chalk aquifer.

It is agreed that the contamination assessment should appropriately account for the SPZ1c within the conceptual site model, but I would anticipate the local geology to preclude any significant risks through attenuation if not through physical hydraulic separation.

Surface Water Drainage / SuDS / Pollution

I have reviewed the revised FRA & Drainage Strategy (March 2018). I note that since the previous issue, Southern Water Services has provided as response, and that the drainage strategy has been developed / amended.

Southern Water has made some comments as regards the importance of intercepting oil prior to connection with the public network, which has prompted the inclusion of several proprietary pollutant interception units (assumed to represent bypass separator units) in the revised scheme. It is not clear that the surface water connection is proposed to be to the public system, and it would appear that direct communication to the Lavant via the extant culvert is proposed, in accordance with the SuDS manual hierarchy. It also appears that the applicant may have overlooked Southern Water's comment 'oil trap gulleys or-' [petrol/oil interceptor].

I note that attenuation basins / swale conveyance is proposed in principal, both of which comprise pollutant control structures, and both of which can be combined with other SuDS elements capable of intercepting, retaining &/or treating contaminants. Considering the inherent risk of pollution from low-speed-limit residential roads, and residential car parking areas, the use of proprietary interceptors would not normally be necessary. Interceptors are only as good as their maintenance regime, and as such formalised provision should be made for routine inspection maintenance if interceptor units are to be deployed as an integral part of the drainage strategy.

An interceptor unit would be appropriate for the commercial parking areas if those areas share a surface with delivery areas that could be described as a commercial 'yard' (delivery / loading area). If those areas are separated (e.g. by either physical barrier or topographic slope), an

interceptor unit may only be necessary for the higher risk areas of the commercial site (allowing it's size to be minimised, or extending periods between periodic maintenance.).

It is agreed that separation of roofwater from surface runoff (not passing roof water through interceptors) is appropriate (is good practice), and that storage of surface waters within swales / basins is an appropriate strategy. It is at this stage unclear how the flow control is to be achieved - whether via levels management (weir, or outlet pipe height differential), or via proprietary structure (hydrobrake or similar). The adopted solution should have regard to the risk of blockage, in order to minimise potential for local flooding.

Given that the drainage strategy appears to remain relatively fluid at this stage, it is recommended that it is approved in detail as a reserved matter, or that prior approval is sought by means of a suitable condition along the lines of the wording below:

Approval of Surface Water Drainage (SuDS / Pollution Prevention) [3]

Prior to the commencement of any specific phase of development hereby approved (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), details of the proposed means of surface water disposal shall be submitted to, and approved in writing by, the Local Planning Authority.

Proposals shall be in accordance with the principles of CIRIA C753 section 26.7 (SUDS Manual, 2015; Managing pollution risks), and where appropriate shall include a schedule of operational and preventative maintenance for surface water drainage structures, flow control devices, pumps or separators required either for the proper operation of the system to it's design flow rates or for the effective retention of pollutants to prevent downstream release. Parties responsible for observing the maintenance schedule shall be clearly identified.

All details submitted in accordance with this condition shall be implemented as approved.

Reason: *The proposed surface water drainage system discharges highway & parking area runoff to private drainage infrastructure directly communicating with the River Lavant (classified as a 'main river' channel). Appropriate system design is required to prevent surface water drainage functioning as a pathway for pollutants to enter controlled waters. This condition is imposed having due regard to policy DM10 (Havant Borough Local Plan (Core Strategy) 2011) and the National Planning Policy Framework 2012.*

Summary

Other than the above recommendations, the proposals are supported. As indicated in the introductory section, conditions are recommended assuming that this is the / an appropriate stage to do so, and for the avoidance of doubt (where omission at the Outline stage may hamper application of conditions at Reserved Matters.

Where it is possible to address elements as a reserved matter (this may apply particularly to drainage), I am comfortable deferring comments / controls to the detailed application stage.

Mr. Jonathan Driver
Environmental Control Officer