

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/18/01382	Your Ref:	APP/18/00453
EH Case Officer Extn:	44 6677	Date:	07 August 2018
DC Case Officer:	David Eaves		
DC Case Officer Extn:	44 6549		
Application Number:	APP/18/00453		
Site Address:	Land South of Eastleigh House & Helmsley House, Bartons Road, Havant		
Proposed Development:	Reserved matters application following outline permission APP/15/01435 to layout, scale, appearance and landscaping for 175No. dwellings (including 53 affordable homes) comprising 5 x 1 bed flats, 18 x 2 bed flats, 28 x 2 bed houses, 84 x 3 bed houses and 40 x 4 bed houses; play area and public spaces, roads, footways, cycleway, and drainage features.		

Observations / Comments:

I have reviewed the documents submitted in support of this application, alongside the comments of some key consultees.

I note in particular the comments of the flooding consultee - who points out that drainage infrastructure is not a reserved matter per se (within the meaning of T&CP DMP 2015), with the approval of details more appropriately comprising a discharge of conditions application.

This is relevant to the consultation in general, in that matters relevant to Environmental Health have either previously been dealt with, or the opportunity to make comment & secure design elements / mitigations has passed with the consenting the 2015 OA application (for which Environmental Health was not a consultee).

SuDS;

Notwithstanding the above, or the comments from landscapes (as regards the form of the features) - the SuDS strategy principally aims to achieve flow-rate control. The pollution risk of a residential development whose surface water collection system ultimately discharges to the existing public sewer system is essentially very low. Matters relating to storage volumes and discharge rates would be more appropriately dealt with by the LLFA. I have no specific concerns relating to pollution or the exacerbation of natural geological erosion.

Air Quality;

I have taken a look at the transport assessment submitted with the outline application, and note that expanded manual turning counts suggest a vehicular flow on Bartons Road of around 11,000 AADT. Central estimate of development flows amounts to almost exactly 10% of this

value, right on the screening threshold determining the requirement for an air quality assessment (>10% contribution to a 'busy' road link).

I had at the pre-application stage flagged the possible need for an air quality assessment to inform the principle of development. It is acknowledged that the principle of development has been established under the 2015 outline consent.

I am not particularly concerned about the missed opportunity to secure a formal assessment of Air Quality (development traffic as source) - there is an argument that the eastbound / westbound routing bias from the site access (in the operational phase) is sufficient to dilute the proportional 'road link' impact below the screening threshold - which is perhaps materially relevant in this case as the most sensitive receptors are located some distance from the site access.

It is unclear if there remains opportunity to secure design features relevant to air quality, as there are few related conditions attached to the outline consent, and the reserved matters are of course limited to access, layout, scale, appearance, and landscaping. Given this, it appears that the opportunity has been missed to exercise 'air quality relevant' policies to secure a development with 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 appliances, 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.

Given the stage of application, it would not appear that there is opportunity to push for an improved environmental provision.

Summary

Within the policy bounds and recognising the limited scope of the consultation; I have no material concerns or objections to make.

Mr. Jonathan Driver
Environmental Control Officer