

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/17/02087	Your Ref:	APP/17/00656
EH Case Officer Extn:	44 6677	Date:	06 November 2017
DC Case Officer:	Lewis Oliver		
DC Case Officer Extn:	44 6263		
Application Number:	APP/17/00656		
Site Address:	Land South of, Manor Road, Hayling Island		
Proposed Development:	Erection of a discount foodstore with associated parking and landscaping and new vehicular and pedestrian accesses to Manor Road.		

Observations / Comments:

I have reviewed the revised documentation submitted in support of these proposals, and would like to provide general comment on the (revised) HOP FRA & SuDS report, RPS Transport Assessment technical note, and Arcadis Travel Plan.

Transport Travel (Air Quality)

The scope of the RPS technical note was limited to addressing specific HCC concerns / comments relating mostly to the provision of underlying data summarised in the text of the previous report, and justifications for data underpinning the junction capacity assessment, and the approach used (mainly to accounting for vehicular trip assignments). HCC had also requested that the applicant consider improvements by way of impact mitigation and improvements to the locality in line with local & regional policy.

There are elements of the technical note that I would challenge - particularly in terms of realistic walking / cycling distances, or the distances over which it is reasonable to expect customers to be happy to walk to access public transport. I would consider that the distances quoted might be reasonable for access to the proposed store, they are unlikely to be acceptable for the return leg of a reciprocal journey for a retail purpose other than a light 'top-up' shop. In this regard I would tend to agree with section 4.4 of the Arcadis travel plan, which states that "*Trips to food stores are...typically by car due to the bulky nature of the purchase*".

I would also challenge the references to the use of existing cycle routes, as the Hayling Billy would only appear to serve around 300 residential units likely to utilise this route to the proposed store, and the shortest transitional route (i.e. the only route not unnecessarily long) is via West Ln, which attracts a hazard warning on the cycle map. The on-road route referenced similarly does not allow users to avoid the A3023, rather it represents the shortest on road route for likely users, including the A3023.

The TRICS data to support the original assessment, representing an improvement in data quality / robustness. Detailed traffic count data are similarly positive, confirming that flows on

Manor Road are around -20% the previous best available estimate AADT flows. It is acknowledged that the junction capacity assessment used conservative assumptions as regards new vehicle trips, and that the inclusion of growth projections did not materially alter the result.

As I have previously indicated, I consider the net impact of the development likely to be positive (in air quality terms), by reductions in trips further north on the local network. In this regard, whilst cycle route improvements would be seen as a positive measure contributing to improvements to local air quality, it is difficult to justify pushing for improvements on the basis of 'mitigation of a negative travel impact'.

It does appear that there are policy measures which could be drawn upon to justify improvements suggested by HCC, without the need to rely upon mitigation of a negative impact as justification. For example, the LTP3 policies relating to the 'quality of life and place' may provide a useful basis upon which support for the 'park and stride' scheme could be required, or strongly encouraged. Local Policy DM11 (1) arguably provides an even stronger basis upon which such support could be secured.

It is not entirely clear whether the support for the 'park and stride' scheme (or lack of it) is material, or moot - in that it is unclear how the 90 minute parking limit is enforced. If no till validation is required, then the car park is effectively available for use during school collection / drop-off (as sufficient time is available to make the walking trip to the Mill Rythe Infants / Junior Schools), and the only material difference in support for the scheme would be in its promotion.

For this location, I regard support for the Park & Stride scheme to be relatively neutral as a measure to improve local air quality by reducing local emissions. The scheme could encourage a 'shortening' of the sustainable leg of a vehicle / walking transition by placing available parking closer to the Schools than might otherwise be utilised, or it could encourage use of vehicles where the entire journey might otherwise be undertaken on foot (e.g. a local trip, during bad weather). I will leave it to the expertise of highways to determine whether the local policy should be evoked to secure support for the scheme.

I do note that the submitted travel plan is restricted to employees only. I think that this somewhat devalues the impact of the plan, as even a modest shift in customer travel behaviour would have a large absolute effect, despite the small proportionate shift. In this respect, and in line with comments above, I would support any efforts by HCC to secure additional store adjacent bus stops to encourage use of public transport. This measure is likely to have the biggest overall impact in terms of trip rate reduction. I do take on board the point (however) that benefits could be negated by conflict between stationary busses on the highway & vehicular traffic - so lay-by stops would be preferred if this measure could be secured. DM11 (1) would appear to be a suitable policy measure by which this could reasonably be sought.

Other than the above, the revised assessments / proposals include little of material relevance to local air quality, other than the inclusion of the right-hand-turn ghost island, which is viewed positively from the perspective of maintaining free-movement of traffic.

Drainage (SuDS), Flooding & Pollution

There would appear to be little material change as regards pollution. I note that the SuDS treatment train loses two steps, with site discharge now more conventionally proposed direct to the Church Ln Stream via trapped gulleys, below ground granular storage, and an oil interceptor unit. I do not regard the proposals to amount to a 'permeable paving' system, as the levels of filtration within the granular storage are likely to be substantially less than via a true permeable surface solution.

The proposals remain adequate from a pollution prevention perspective however, and I note

that the omitted SuDS treatment features make room for flood alleviation (storage / attenuation basin). I agree that the flood alleviation is a positive change, providing flood water storage to the benefit of Church Ln, and providing ecological benefit by way of refugia.

Conclusions / Recommendations

My previous recommendations remain valid, and are unchanged (i.e. that the SuDS strategy be listed as an approved document to ensure that no 'downgrade' of pollution prevention can occur).

The application is supported on grounds of the net air quality benefits anticipated on sections of the A3023 north of the site.

Mr. Jonathan Driver
Environmental Control Officer