

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/17/02455	Your Ref:	APP/17/01324
EH Case Officer Extn:	44 6677	Date:	03 January 2018
DC Case Officer:	Daphney Haywood		
DC Case Officer Extn:	44 6513		
Application Number:	APP/17/01324		
Site Address:	Dunsbury Park, Fitzwygram Way, Havant, PO9 4EE		
Proposed Development:	Variation of Condition B6 of Planning Permission APP/15/00732 to remove restriction on proportion of B8 floorspace allowed within the Dunsbury Park development, and thus provide for a maximum mixed use floor space of 61,779sqm within Classes B1, B2 and/or B8 of the Use Classes Order 1987 as amended.		

Observations / Comments:

I have reviewed the submitted information & covering letter, noting that the environmental statement addendum dates to 2015 and is unchanged from that which supported the 2015 application to increase the B8 allowance from 20% overall floorspace to 30%.

Some problems were noted at the time this information was assessed (2015), but which were not considered sufficiently material to the magnitude of increase proposed (i.e. additional 10% allocation), and were not therefore pursued.

Completely removing the restriction on B8 floorspace could substantially alter the emissions impact of the site, and magnifies the potential significance of the conceptual problems with the underlying traffic model which has informed the Air Quality assessment.

It is entirely understandable why the applicant has re-submitted the 2015 assessment, as it does indeed test the scenario of 100% B8 allocation at the site, and would in principle therefore be suitable to support this change to condition no B6.

I acknowledge that condition B6 was imposed for reasons of business diversity, and aspirations for employment provision under policies AL1 & CS18. It is obviously a policy matter as to whether the removal of the B8 use restriction is likely to result in a loss of the consented Hotel & Conference facilities from the scheme, or indeed result in an undesirable bias in new employment opportunities generated; though these are theoretically possible consequential outcomes. It is also acknowledged that economic development has indicated no substantive reasons to object, indicating support for the lifting of the restriction.

It is worth noting at this point that the indicative masterplan submitted with this application appears to be a superseded revision (Drawing No. 10004 rev. P5 submitted, Rev. 6 referred to in the covering letter). You may wish to obtain a current version of the masterplan prior to determining this application, as this could usefully serve as an approved document to guide the balance of development coming forward as detailed schemes under the overarching OA.

It is of course acknowledged that the purpose of this application is to achieve development flexibility, and that a 100% B8 delivery is not likely. It is clear however that well in excess of the currently permitted 30% is likely to be delivered - amounting to 52% of the consented 61779 sq.m under the P5 indicative masterplan, with around 21% currently unallocated to any specific use class. Proportions >60% are therefore not unlikely.

Impact of change (Highways, cf. Air Quality)

As is acknowledged in the supporting statement, the increase in B8 allocation will impact the trip generation, highway usage patterns, and overall traffic emissions associated with the development.

The implications are somewhat different whether the focus of assessment is the highways impact during peak flows (junction capacity & congestion), or air quality (overall emissions from roads where development traffic will materially increase trips carried by specific road links).

This is illustrated clearly if traffic is considered using a 'PCU [private car units] equivalent' metric. Notwithstanding the apparent calculation error in applying a HDV to PCU conversion factor (table 8-5), the 2.3 factor stated appears to refer to the physical space taken up by the vehicle trips, as 'metres of highway saturated' (vehicle lengths), so applying to queue lengths and being suitable for peak highways impact assessments, but not being adequate to consider the PCU equivalence in terms of emissions.

Conservatively (based upon Euro engine emissions standards under test conditions), an appropriate HDV>PCU conversion factor for air quality purposes would be around 8.2. To reflect real world conditions, the factor would likely have to be greater than this by a comfortable margin.

In terms of highway capacity impact, and considering PCU equivalent figures, a 100% B8 allocation scenario result in an overall trip rate reduction of 304 vehicle trips (24hr AADT). The trips generated would also be distributed more evenly throughout the day and less concentrated during the peak commuter period. In highways terms (therefore), removal of the B8 restriction would be unlikely to represent a negative material impact.

Under a similar calculation considering the vehicle emissions impact (as PCU equivalent emissions) for air quality purposes, the 100% B8 scenario results in +9643 vehicle trips (24hr AADT). This represents a 105% increase over the original consented scheme (with the 20% B8 limit in place), representing a probable doubling of overall emissions under this conceptual scenario). This is a result of substantially higher HDV emissions (cf. PCU's), and the increase in daily HDV trips associated with the development of +1686 compared with the consented scheme, outweighing (in emissions terms) the -4182 reduction in daily PCU trips which would otherwise be associated with the removal of the B8 floorspace restriction.

Conceptual issues with the Traffic & Air Quality Assessments

The traffic model underpins the air quality model, which uses both 'all vehicle type' AADT flows and % HDV traffic as key parameters to determine emissions rates. Issues with the traffic model therefore directly affects the output of the air quality model. As described above, some conceptual discrepancies have been identified with the figures presented, which either represent artefacts of a traffic routing model not directly related to the development (e.g. built-in to the underlying Sub-Regional Transport Model, SRTM), or are related to scheme-specific factors (or assessment specific assumptions) that are not sufficiently explained within the submitted assessment.

The effect of some of the potentially anomalous parameters applied appears to be a alteration of baseline conditions against which the changes associated with the development are being judged, serving to minimise the magnitude of change concluded to be directly associated with the development (and so being favourable to the applicant for assessment purposes).

As stated above, these issues were extant under the 2015 application, but were not considered material under the magnitude of change proposed. That the effect of these parameters is favourable to the applicant does not mean that the parameters are not appropriate, but it is considered that if we are to accept them, they should be more robustly justified. It is considered that these issues should be addressed by the applicants prior to awarding a positive determination to this application, or that a revised air quality assessment be required, or both.

Factors listed below cover both traffic & air quality parameters.

- The principal issue is that the 2019 DM scenario is not particularly clear. Traffic parameters applied under the 2019 DM scenario differ substantially from 2011 baseline conditions, resulting in some ambiguity over whether the 2019 scenario represents i) simply 2011 baseline conditions projected to year of opening (i.e. all things being equal, no development), as would be expected - or, ii) delivery of Phase 1 as consented, without change to c.B6. The substantial differences between the character of the baseline conditions and 2019 DM conditions suggests the latter, but there are reasons to suspect that figures are intended to represent the former.
- % HDV flows on Hulbert Road (Table 9-1) under the 2019 DM scenario are +4.3% total flow (643 additional HDV trips), compared with the 2011 baseline. % HDV does not typically vary by significant amounts, and this change is not explained in conceptual terms. Figures presented for North / South of site are balanced, indicating that the site is not contributing to flows under this scenario.
- Total AADT flows on Purbrook Way East of ASDA Roundabout is 181% of baseline flows under the DM 2019 scenario, increasing by more than 15000 trips/day. This substantial change is not explained in conceptual terms.
- The 2019 DM scenario anticipates a substantial reduction in HDV traffic on the A3(M) ranging from just 37% to 59% of 2011 flows (representing a reduction of between 1600 & 3000 HDV trips on the national trunk road). This substantial change is not explained in conceptual terms, and corresponds to a period of growth in total flows on these road links. Similar (likely related) reductions on slip roads remove HDV traffic between 2011 baseline years & 2019 DM scenario, meaning that HDV trips allocated to these links under the 2019 DS (development) scenario simply restore trips to baseline levels (or only alter these levels in a minor way).
- The routing model applied to the 2019 DS scenario has a strong southbound trip bias, allocating the majority of HDV trips to route via the ASDA roundabout to J4 of the A3(M), as opposed to accessing the Strategic Road Network (SRN) via J3 (an arguably favourable route). There are good routing reasons why routing Westbound trips local via Purbrook Way would be preferable, but trips with destinations >15 miles distant to the East or West are likely to be better routed via the A3(M) and A27 (Via the Rusty Cutter roundabout for Eastbound trips). The routing model does not include detail beyond Purbrook Way East of College Rd (i.e. not routing to/via the SRN), so trip distribution between College Road and Purbrook Way (Westbound to Stakes Rd. etc.) is unclear.
- Air quality background concentration estimates appear to have changed (revised downward since the 2015 assessment), plots undertaken for HBC's air quality reporting duties (which should utilise the same data) consistently return figures less than those used in the assessment. Revising these figures within the assessment would reduce overall concentration estimates (Background + Baseline Traffic Emissions + Development Traffic Emissions), but would conversely elevate the proportional impact of both Local (Baseline) Traffic & (perhaps more critically) Development Traffic Emissions.

It is worth noting that the screening the removal of the B8 restriction against the IAQM / EPUK guidance on assessing the impacts of air quality (Table 6.2) would suggest that a revised air quality impact assessment is required under point 2. (change in HDV flows of more than 100 AADT). This change would result in +227 HDV as AADT on Purbrook Way cf. 2019 DM scenario, and at this stage there is no reason to suspect that these trips will not be routed past the closest residential receptors located at Khandala Gardens (within 10m of the kerbside)

It is also worth noting that the assessment should be concerned with the magnitude of change associated with the development, and not the overall concentration per se.

Conclusions

It is understood that the purpose of this application is to achieve flexibility, and that full B8 allocation is unlikely. The 2015 assessment aimed to address the worst case scenario of 100% B8 (which is considered to be a robust and appropriate approach, given that this scenario of possible, if not in practice especially likely).

The 2015 assessment was therefore appropriate in scope, but the model included parameters that were insufficiently explained / justified, that are in principle capable of materially influencing the critical outcome of the model (i.e. the magnitude of development impact against a 'no development' scenario), and/or which may have been superseded (e.g. DEFRA background estimates).

Whilst it is acknowledged that the restriction on % B8 floorspace was not put in place for environmental reasons, it is clear that allowing a 100% B8 allocation will represent a negative impact in transport emissions / local Air Quality terms. In principle, unbalanced development (i.e. heavy B8 landuse bias) could materially harm previously agreed transport & air quality mitigation, as workplace (employee, customer) travel plans are much less effective where traffic impact is from operational vehicles where modal shift is not possible. Similarly, the reduced employment density might harm the viability of the bus service utilising the purpose built bus-gate controlled site access route which formed a key part of the impact mitigation for the outline scheme.

It is not clear whether there is scope for operational traffic routing plans to be implemented which seek to divert trips from unnecessarily routing on roads close to residences (or unnecessarily via busy road junctions). This form of planning would likely be very effective mitigating air pollution impacts if well implemented routinely observed, especially as the Hulbert Rd. route to J3 is essentially free of proximal sensitive receptors.

It is not clear whether or not that impact of the proposed change is acceptable without mitigation, and I would conclude that either a revised assessment-, or a more robust explanation of the model- is required to justify the proposed change.

In particular, I would like to see a clearer & better justified trip routing model for development traffic, a more robust treatment of differences between baseline and DM scenarios (if based upon routing assumptions associated with ASDA roundabout improvement, perhaps including revised survey data to confirm, now that the junction improvements are complete), and (if proceeding to a full assessment), use of up-to-date background pollutant concentration estimates.

The 2015 assessment identified elevated trips on Purbrook Way, but did not include a sensitive receptor on the Western leg. If proceeding to a full revised assessment, it would be beneficial to assess the most sensitive receptors on the Purbrook Way route (currently considered to be #12 Khandala Gardens, West of ASDA roundabout) in addition to receptors previously assessed. In the event that no substantial revisions are required to the 2019 DM or P1 distribution models, it may only be necessary to assess receptors where the greatest proportional impact was noted e.g. receptor no. 1 & 3 (& no. 5 for verification), in addition to a new receptor on Purbrook Way West of ASDA roundabout.

If there are substantial revisions to 2019 DM %HDV traffic, or all-vehicle-types AADT flows, it may be prudent to re-assess all receptors, for consistency.

Recommendation

I do not object in principle to the lifting of the restriction on B8 floorspace subject to a robust & appropriate assessment. However, it is not considered that the current assessment is sufficiently robust to support the application at this stage.

I would recommend that either the current application be refused, or withdrawn by the applicant pending further consideration of the traffic & air quality model. Further consideration could take the form of- additional justifications (i.e. a statement providing a better conceptual explanation of the presented model), revised mitigation proposals appropriate to the trip profile associated with a 100% B8 allocation, a revised traffic &/or air quality model, or indeed a combination of these.

Mr. Jonathan Driver
Environmental Control Officer