

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/17/00125	Your Ref:	APP/17/00007
EH Case Officer Extn:	44 6677	Date:	14 February 2017
DC Case Officer:	David Eaves		
DC Case Officer Extn:	44 6549		
Application Number:	APP/17/00007		
Site Address:	Land off, St Mary's Road, Hayling Island		
Proposed Development:	Outline planning application for the erection of up to 210 residential dwellings (including affordable housing) and 0.6ha for apartments with care (C2), structural planting and landscaping, informal public open space, children's play areas, sustainable drainage system (SuDS) vehicular access from St Mary's Road and associated ancillary works. All matters reserved with the exception of the main vehicular access.		

Observations / Comments:

I have read the supporting documents to this application, inclusive of the Transport Assessment, Travel Plan, Air Quality Scoping, Flood Risk & Drainage (SuDS) strategy, Phase 1 Site Investigation, and a cross section of Public Comments.

I would like to provide some brief comments, and will limit these to broadly those subject areas of concern to Environmental Health.

Public Comments

It is noted that the subject areas principally raised in objection to this application relate to the capacity of the road network, increased traffic & related pollution, the risk of congestion / increase in journey times, and capacity issues relating to other local infrastructure.

In respect of the latter, the capacity of the foul sewerage system has been identified as a concern, with residents referring to i) surcharge in foul systems resulting in surface flooding and ii) discharges of foul sewerage to the Harbour either by overflow connections with surface water systems, or directly by means of historic overflow provisions.

I will touch on the capacity / traffic / congestion issues in comments on the transport assessment / travel plan / air quality scoping, but in relation to the foul drainage, my only comment is to highlight the sensitivity of harbour waters / habitat to contamination from organic matter, nitrates, phosphates & ammonia. Given the protection status of the Harbour (SSSI / SPA / SAC / RAMSAR etc.), any risk of exacerbating existing sewerage inputs should be adequately considered in the detailed foul drainage design.

It may be necessary to address localised capacity issues at key nodes in the public system, and it is anticipated that the s106 process could be used for this purpose. I would not anticipate that works required to ensure capacity / mitigate pollution risk will be uneconomic within the context of the development.

I expect Southern Water to provide detailed comment in this regard at the reserved matters stage.

Transport Assessment & Air Quality

It is noted that the transport assessment has a broad scope for a development of this scale; considering a road network of some 7 kilometres that includes the most congested junctions, and routes where roadside air quality is poorest.

The assessment is considered to have been based upon robust assumptions and good quality baseline data with regards journey times, vehicle speeds and flow volume / timing. Trip rate generation estimates are considered reasonable, and I have no acute concerns in respect of the methodology or analysis.

The report acknowledges the limitations of the models employed in terms of their ability to accurately account for driver behaviour (appropriate lane selection) and turning movements blocked by queues (which may be caused by poor lane selection, or other driver behaviours not accounted for with the model).

In terms of overall outcomes, it is notable that the assessment concludes that theoretical practical reserve capacity at all junctions considered (& unused theoretical capacity exists at all roads assessed). The report acknowledges that this does not necessarily align closely with real-world conditions, recognising that other factors contribute to local congestion issues. This is particularly the case in relation to the Langstone Road / Park Road / A27 Junction where congestion related to the particularly tidal traffic flows on- & off- Hayling Island are not uncommon.

Langstone Road & A27/A3023/B2149 Junction

Local observations reported identify a traffic 'bottleneck' relating to the merging of the two southbound lanes at the north end of Langstone Road, thought to account for a degree of queuing at this location. Analysis of survey data indicates that the right-turn ghost islands south of the Langstone Technology Park Access are underused, and could be modified (shortened / narrowed) to increase the lane merge length on the Southbound carriageway of Langstone Road. The effect of this is to expected to increase stacking capacity and provide more time / distance for gap seeking; though modelling has not been undertaken to quantify the degree of benefit that could be realised.

Havant Borough Council has through it's own monitoring recently identified a kerbside air quality issue at the East Side of Langstone Road, spatially (but not necessarily causally) associated with the merging zone of these lanes. Whilst the cause and extent of this local air quality issue has not yet been robustly established, it is considered plausible that the locally elevated road traffic related pollution could be associated with either (or both) i) increased queuing on this section of road (stationary, idling traffic) resulting from the conditions specifically identified in the Prime Transport TA report, &/or ii) aggressive driver behaviour when merging / gap seeking (acceleration / deceleration), both to utilise gaps and to avoid others making swift &/or sudden lane-changes.

It is conceivable that the latter could be exacerbated by driver frustration / impatience linked to previous delays, for example at the A27 junction.

In respect of the A27 junction, a manual optimisation of signal timings (within the model) at the A27/A3023/B2149 junction identified potential for significant betterment to junction performance, without making any changes to lane geometries or lane selection parameters (routing or driver behaviour). This suggests that improvements to current flows should be theoretically possible through adjustment of traffic signals.

I note that the report indicates that Gladman would be willing to fund the relatively minor highways improvements on the A3023 Langstone Road.

Whilst I recognise that the scale of the impact of suggested changes on local traffic flow is unquantified, the evidence based argument for the making of such changes is compelling, and I would expect a net improvement to highway function to be more likely than would a detrimental impact on the primary flow.

Subject to the opinion of HCC Highways (particularly as regards safety), I would fully support the making of the proposed alterations on the basis of both improved traffic flow (reduction in congestion), and the analogous potential for a material improvement in air quality at a location where substantial exceedances of air quality objectives have been identified at the kerbside.

I would similarly recommend that the signal timing modelling is carefully examined with a view to implementing changes in line with the presented model, should it be the conclusion of HCC Highways that it is plausible for the theoretical flow improvements to be realised under real-world conditions.

The combination of these two factors could have a substantial positive impact for both highways and air quality.

Hayling Bridge, Capacity

The assessment of Hayling Bridge capacity is accepted, as are the arguments for link capacity thresholds being somewhat conservative, if only in terms of the assumed HGV threshold being significantly higher than that observed utilising the bridge.

The bridge is not considered to represent the principal flow bottleneck in the context of the modelled network, and whilst it is acknowledged that several respondents have referred to the need for an additional bridge to the Island, I would consider this to be both well beyond the scope of an application such as this in terms of proportionality, and arguably impractical given the current traffic routing constraints that exist both to the South of the A27 junction, and within the Northern part of Hayling Island.

Development Trip Generation

Vehicle trips associated with new development are generally regarded as being new to the road network, and it is recognised that residents of Hayling Island are likely to be more reliant on the private motor car than would residents of mainland locations better served by public transport, retail / employment and community services.

It is similarly recognised that the development traffic will show a significant routing bias to the North, where routing options are constrained.

The 12 hr trip generation rate associated with the development is estimated to be 1366 vehicles. The basis for the estimate incorporates a degree of uncertainty, but contributory factors introduce opposing bias, and so the estimate is regarded as being reasonable for a development of this type, in this location.

The 1366 12hr value equates to approximately 1545 as an AADT (additional trips, on the average 24hr day). This equates to a substantial proportional increase of around +50% current flows on St. Mary's Road (100% traffic utilisation). In air quality terms, this increase is from a low base & is therefore unlikely to be material in terms of this individual road link, with the school likely to continue to represent the greatest focus of traffic at this location.

However, potential for congestion at the Tournurbury / St Mary's Rd. / Elm Grove / Church Lane junction was raised by many in objection to APP/12/00966 (Land South of Beech Grove / North of Goldring Close), with many objectors citing the location of the Co-operative store on the corner of Tournurbury Lane as being a contributory factor to local congestion.

The Prime Transport report indicates that development contribution to this junction will be up to 9.5% (PM Peak). Calculations show that the daily impact could also be of this order (assuming an total junction flow of around 15-16,000 AADT), and it is recognised that the model employed (which concludes sufficient practical reserve capacity to accommodate the development under all scenarios) does not effectively account for driver behaviour in heavy traffic (e.g. lane blocking). The level of traffic increase at this junction, and the anecdotal reports of local issues during peak flows (notably not observed by Prime transport in their 2016 survey) would lead me to conclude that a disproportionate impact at this junction is possible, and consideration of local Air Quality at this location is important. It is recommended that the impact of turning movements to the Co-operative access is considered alongside the highway junction arms within the assessment at this location.

Potential highways impacts as regards safety, junction function, and impact on journey times are for others to address.

Wardell Armstrong Air Quality Scoping

The air quality assessment described is considered to represent a comprehensive & robust scope, considering both short & long term impacts, local & remote, and impacts to both human health & the wider environment. Relative to the scale of the development, the proposed assessment has a broad scope and represents a significant degree of environmental commitment. The technical details are, as is suggested within the scoping document, agreed.

However, the report represents scoping only. In the absence of either the degree or locality of any adverse air quality impacts being quantified at this stage, I am unclear on the 'fall back' position in the event that (following the granting of outline consent) a significant adverse air quality impact is later identified at a key location on the network considered.

It is recognised that all matters are reserved other than the site access, the outline consent still relates to the development of 210 dwellings, to which the traffic related pollution is attributed. Are we able to rely upon the use of the phrase 'up to' in the development description to reduce the quantum of accommodation in response to significant adverse impacts, or would adverse results simply inform s106 negotiations for highways improvements or other sustainable travel contributions in mitigation for (off-set of-) negative impacts? Without quantification and identification of affected location(s), it is unclear whether mitigation would be economic.

It is a planning question as to whether it is procedurally reasonable to grant outline consent for a given quantum of development in the absence of a full assessment of the likely impacts. Based upon the traffic assessment submitted, I consider it unlikely that a severe material impact on local air quality would be identified, so this may be an academic question.

The transport assessment highlights feasible mitigation options that could deliver real-world air quality improvement, and any local issues are likely to be spatially focussed upon the vicinity of the site access, where relatively minor junction alterations could represent a reasonable solution without placing the viability of the scheme at risk.

I would recommend that the scope of air quality modelling be expanded marginally to consider a scenario that includes the proposed highway alterations to the Langstone Road southbound merging, in order to quantify the likely impact in terms of local air quality (and thus the mitigation value in the event that significant adverse impacts are identified elsewhere in the network that require mitigation or off-set).

On the basis of the above, I do not object to the granting of outline consent, subject to the air quality assessment described in the Wardell Armstrong Assessment Methodology Ref: CMD/EZ/LE13606/002 informing the reserved matters application(s) to follow. In the event that it is considered appropriate to secure this assessment specifically by condition, please contact me to discuss appropriate wording.

Travel Plan

Lacking key information relating to the quantum of development, detailed parking provisions, s106 provisions, or air quality impacts, the travel plan is perhaps unavoidably broad & relatively generic. The document recognises that it represents a framework which will evolve in response to detailed development plans, related assessments, and resident behaviours upon occupation.

It is understood that Hampshire County Council has responsibility to ensuring that the targets & objectives of the travel plan are met. I am unclear on the scope of contingency arrangements in the event of repeated failure to meet targets after 100% occupation.

If the evolution of the travel plan includes provisions specific to the mitigation of adverse development impacts in respect of air quality, it will be important to ensure a mechanism of oversight, and clarity in contingency measures to achieve the key objectives & outcomes.

Ground Contamination, Phase 1 Preliminary Risk Assessment

The phase 1 assessment submitted would appear to be a comprehensive assessment, adequate to broadly categorise areas of the site in terms of probable risk, and to inform the scoping of the phase 2 assessment proposed.

It is noted that whilst this assessment included some elements of intrusive investigation, no chemical sampling was undertaken. In this respect, a low density confirmatory Phase 2 assessment across areas of the site identified to be low risk is agreed to be appropriate. Higher risk areas of the site were identified, notably including some raised land, farm buildings & fuel storage areas central to the site, alongside farm tracks and other surface workings.

The UXO/UXB assessment was informative, and identified a non-negligible risk in terms of the potential for presence of ordnance. It is considered essential that a robust watching brief be maintained, with all groundworks staff being briefed on contamination & UXO/UXB prior to being cleared to work at the site.

Conclusions & recommendations of the LKC Ltd. report are agreed, and the recommended investigations / assessments (and any remedial or risk mitigation works subsequently identified as being necessary) are secured by suitable condition, suggested wording overleaf.

Investigation & Mitigation of Contamination Risks, Watching Brief [1]

"Prior to the commencement of any specific phase of development approved by this planning permission (other than demolition, site clearance, or any 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 may comprise separate reports as appropriate, but shall be undertaken by competent persons and unless specifically excluded in writing by the Local Planning Authority, shall include;

- 1) An intrusive site investigation based on the proposals outlined within the LK Consult Ltd. Phase 1 Preliminary Risk Assessment Ref: LKC 16 1109 (Nov 2016); 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, identifying any requirements for longer-term monitoring of pollutant linkages, maintenance of engineered mitigation measures, and arrangements for contingency action.*

All elements shall be adhered to unless agreed in writing by the Local Planning Authority. Both intrusive investigative works & construction groundworks shall proceed in broad accordance with the watching brief outlined in the above referenced LC Consult report, having due regard for the recommendations of the Zetica risk assessment in relation to unexploded ordnance.

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 previous land uses (&/or activities) on site and in the vicinity, that could pose a risk to future occupiers of the site."*

Verification (Remediation / Mitigation of Contamination) [2]

*"Prior to the occupation of any relevant part of the permitted development, any verification report required in accordance with **condition [1, part 3]** 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 & current land uses (&/or activities) that could pose a risk to future site occupiers."*

Drainage Strategy / SuDS

It is understood that the drainage strategy has accounted for a likely increase in surface water flows under a 'with development' scenario relative to greenfield runoff rates; calculating required storage volume for proposed attenuation ponds & permissible outflow rates.

Residential roofwater runoff is very low risk (in pollution terms), and residential roads low risk. With the exception of below ground runoff (volume) attenuation tanks, the SuDS measures identified as being feasible (permeable surfaces, detention basins, ponds, swales, filter strips) will be adequate to mitigate anticipated pollution inputs.

It is understood that flow rates will be limited by means of passive hydrobrake controlled outlets, calibrated to runoff rates equivalent to between 30 & 110 l/s on a whole-site / all outlet basis, dependent upon storm intensity.

Detailed design has not been undertaken, and it is understood that this is to be a reserved matter. It is understood that infiltration is considered to be suitable within some areas, and it would appear that below ground storage is under consideration. It would appear likely from the sewer maps that any discharge to public system is likely to issue from short outfalls at the seafront. The scheme should take care to ensure that effective interception is incorporated into the initial stages of the treatment train where there is a non-negligible pollution risk and discharges are either to ground (e.g. via infiltration) or via pre-fabricated attenuation tank to public sewer.

I've no material pollution concerns as regards surface water drainage in the context of the outline application. It is assumed that the detailed scheme of surface water management systems (including SuDS) will be specifically referenced as a reserved matter (subject to future application).

Mr. Jonathan Driver
Environmental Control Officer