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From: Sue Holt, coordinator. Havant Friends of the Earth [Redacted text]

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Comments on and objections to application plans for former Pfizer site, 32, New Lane, Havant.

APP/21/00200 plus comments on Supplementary Transport Assessment, July 2021

on behalf of **Havant Friends of the Earth.**

Application plans to build a warehouse 'last mile' delivery distribution centre.

Whilst commending the reuse of industrial land for employment purposes, we have some reservations as to the type of reuse. In these times, if there is no **suitable** industry or business, the land could be for housing development – as it is within a residential district – to save making further demands on greenfield sites in Havant Borough.

It appears that the applicant's plans are **not right for this site.**

This will be a delivery service, by its very nature nothing more than a business involving a fast, constant turn over of goods using a high number of vehicles. It will be totally dependent on heavy carbon producing road transport. That's it.

Using light to heavy goods vehicles, a steady stream of traffic will flow in and out of the warehouse **at all times** and through the busy residential streets and centre of Havant.

It is a traffic generating business - in a time when so many organisations and parts of our society are screaming out for fewer vehicles, less pollution, less noise. It goes against all the worthy statements of local plans and national government directives to cut carbon emissions, to slow down insatiable and unsustainable demands.

And as for local employment opportunities, this is not a manufacturing business, and it is clear that there is no assurance of a high level of jobs. **Is this helping Havant and its residents?**

Unless of course it was all just rhetoric?

Traffic issues:

In spite of the applicants plans to provide a fleet of EV delivery vans, (to be applauded in principle) it is in reality neither here nor there at the moment. The need to conform with government regulations to use electric transport, depends on a target : 2030. A distant one in the reality of resident's lives. Even if this is achievable by 2030, over the next few years residents will be subjected **to a huge increase in diesel fumes and particulates , noise and danger** on the roads if this application goes ahead.

Carbon reduction measures should be in place from the start, not as something in the future and in the now, **this business will be heavily reliant on fossil fuels.**

HCC's Highways report on Traffic Distribution expresses concerns about HGVs delivering goods to the site during the night in terms of noise and disruption, but it is implied in the application that there will be more congestion if they have to use peak times. Of course there will be.

The area around the New Lane site is a **busy residential one, with 3 schools and a health centre**, and the only access routes to the main arterial highways are through this area. The issues of safety are paramount here and not resolvable if this application stands. It cannot take the increase in traffic –approx.. **2.5 thousand more traffic movements per day** in built up districts.

This is not a suitable site for this type of activity.

(see E22 Environment and Pollution, Local Plan, - projected levels of noise..and air pollution...(do not have a negative effect on...the wider environment). HCC also ask that ‘ the applicant must provide a updated, robust assessment of existing site trip generation’.

According to HBC’s Local Plan and Regeneration Strategy, last-mile delivery sites **should be on the edge of town**, ie, Dunsbury Way , where there is easy access to the main highways and avoidance of the town centre. This would solve some of the attendant traffic problems.

Ecology of site:

It is good to see that attention has been paid to the trees and landscaping around the site. We urge more however, the site has a wide and rich variety of trees ,most of which are down to retain. It is unclear why some are to be removed. Ensuring trees are replaced like for like, with good sized, deciduous native specimens is vital to the continuing maintenance of the biodiversity.As is attention to the easily overlooked hedgerows. To conform with local plans (Local Eco Network), recognition of the **importance of wildlife corridors** linking with the excellent habitats along railway and nearby woodland is necessary. Are there plans,in accordance with Habitat Assessment, for increasing biodiversity net gain and continuing maintenance relating to future cumulative impact?

Overall, in view of the heavy traffic impact, we ask that the council consider this application unsuitable for this site and reject i

Addendum August 3rd 2021

Response to Supplementary Transport Assessment (STA) July 2021

Re; ...according to HBC Local Plan and Regeneration Strategy, the council has stated that 'last-mile delivery' businesses **should be located at edge-of town sites** - HBC has these available at Dunsbury Farm or Brockhampton West .

We understand that the type of business at the New Lane site will be a parcel delivery centre.

New Lane is no longer an edge of town site as it was in 1960s, and is surrounded by already congested roads and pinch points .

It is a residential area by any definition. The type of industrial business it contains is mostly light manufacturing/engineering and assembly premises, generating (a lot of) car and light goods vehicle traffic.

With all the research and cant of the client's consultants , **this remains a fact – this is still the wrong place for this type of business.**

In spite of remedial and mitigating suggestions – new safe, crossings , bus improvements, cycle lanes and improving junction visibility , they do not in any way mitigate for the mistake of the whole planning application.

This Supplementary Assessment has not produced a clear cut justification of this proposal because it cannot do so. The flaws remain.

In STA 1) - it is unclear as to whether the projected traffic movement figures will mean more or fewer movements at am and pm peaks. But it is clear that there are more HGV movements over a 24 hr period.

And in STA 3) – the Air Quality consultant (Delta-Simons) had inconclusive, wishy-washy defences in reply to the council comments – concluding that emissions from this development would have a 'negligible' (?) impact and 'mitigation not required' as it is all 'compliant with local policies'.

The policy, Policy E23, which requires development impact to 'at least sustain existing levels (of emissions) and...secure improvements in air quality by requiring new development to offset its associated emissions'. A vague promise to use electric vehicles some time in a distant future is not good enough surely for HBC and its environmentally sound policies.? To ensure that in an uncertain future, HBC is not landed with a behemoth of a development simply because it is in the wrong place would be too dreadful, wouldn't it?

The criticism of Air Quality Management still stands unrefuted even after this STA. The consultants responses did not invalidate the concerns expressed.

Until all the original issues, objections and comments are fully addressed by independent consultants, they still stand.