

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/21/02526	Your Ref:	APP/21/00200
EH Case Officer Extn:	44 6677	Date:	26 Aug 2021
DC Case Officer:	David Eaves		
DC Case Officer Extn:	44 6549		
Application Number:	APP/21/00200		
Site Address:	32 New Lane, Havant, PO9 2NG		
Proposed Development:	Demolition of existing buildings and redevelopment of site comprising erection of distribution warehouse (class B8) with ancillary offices and related facilities, vehicle storage deck, new access, landscaping and associated infrastructure. RECONSULTATION REQUEST for revised plans and/or documents received		

Observations / Comments:

These additional comments follow a brief review of the Delta Simons Response to HBC Environmental Health additional comments ref. 20-2175.03, 18/08/2021; responding to EH comments dated 28/07/2021 & 13/08/2021. Delta Simons refer to the latter comments by the date published to the planning portal – both documents bear the same date, representing a templating error.

Comment 1/Response 1 (correlation, precision & accuracy);

The explanation is noted & accepted. No comments arise.

Comment 2/Response 2 (AADT values, network base-flows):

Noted. No comments arise. The applicant is aware that emerging policy requirements deviate from EPUK guidance. This is not material to the conclusions ultimately drawn, or recommendations made within the 13/08/2021 EH comments.

Comment 3/Response 3 (transport demand estimates, gross, net; consequences for impact assessments):

The transport consultant appears to have focussed upon an obvious typographical error, I was of course referring to the Highways Authority (being HCC).

I would defend reference to the fluidity of estimates – they have demonstrably varied with time, and the response references refinements. All prior comments remain applicable in respect of likely gross- and net- demand. As outlined within the 13/08/2021 comments, this is not material to the conclusions ultimately drawn, or recommendations made in air quality terms.

It is relevant to the consideration of highways impacts that the net value assessed for highway capacity purposes represents the average-day peak-period impact, and not the peak-annual-day peak-period impact; following those comments, I trust that the development management service &/or committee will appropriately account for highways with a proper understanding of the likely

range of impacts, based upon the form of landuse for which permission is sought.

There is no need to address the difference between the AQ modelling scenario & HCC approved flows – I have undertaken a reasonable qualitative assessment based upon the quantum of development (avoiding any double-counting), from which conclusions favourable to the applicant were drawn.

In this sense, the overall conclusions are accepted notwithstanding the details of estimates net traffic uplift produced for the highways assessment. No objections arise.

Comment 4/Response 4 (Omission of most sensitive receptor, Cardinal House);

Response is noted, and essentially reflects Environmental Health's qualitative assessment, both in terms of it's conclusions, and underlying rationale.

Comment 5/Response 5 (EH qualitative assessment of AQ impact, based upon independently calculated traffic uplift);

There is no conflict between Delta Simons & Environmental Health – given the amended scenario parameters, there is agreement. No objections arise.

Summary

The Delta Simons response provides no reason materially alter comments made by Environmental on 13/08/2021 (incorrectly dated 28/07/2021), following discussions with the Highways Authority.

Where not covered by the text above, comments from 13/08/2021 are considered to remain valid. I would draw your attention in particular to the recommendations within those comments for the planning conditions proposed by the Highways Authority, which without amendment would be unlikely to have the intended effect.

The prior holding-objection on air quality grounds was-, and in light of the Delta Simons Response 20-2175.03 remains-, withdrawn.

Prior comments and recommendations (recommended suite of conditions) made within the former comments (28/07/2021) in respect of ground contamination remain both valid & applicable.

Mr. Jonathan Driver
Environmental Control Officer