

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/20/00713	Your Ref:	APP/20/00212
EH Case Officer Extn:	44 6677	Date:	03 April 2020
DC Case Officer:	Tina Pickup		
DC Case Officer Extn:	44 6461		
Application Number:	APP/20/00212		
Site Address:	3 London Road, Purbrook, Waterlooville, PO7 5LQ		
Proposed Development:	Proposed change of use of site to vehicle washing facility (sui generis).		

Observations / Comments:

I have reviewed the application and supporting documentation, alongside the comments of key consultees. It is acknowledged my colleague has objected to this development on amenity grounds; comments here do not override that recommendation.

Drainage / Pollution

The Site Layout indicates that an arrangement of French drain(s) will collect surfacewater and communicate runoff to an 'interceptor' unit which discharges to 'existing site drainage'. The proposals are unclear on whether it is proposed to discharge the site runoff (comprising surfacewater + trade effluent washwater) to the public Foul Sewer, or Surface Water Sewer.

Southern water point-out that discharge to foul would require a trade effluent discharge licence. It is less clear whether discharge to public Surface Water system would require a discharge consent (from the environment agency) for discharge to the public surface water system (via the proposed 'interceptor' unit), but it should be noted that the surface water system discharges to the culverted "Wallington South" watercourse just 150m south of the development. This watercourse is a statutory main river, running in open channel at around 200m from the site (i.e. within a short distance).

The application documents do not specify an interceptor unit type or size, and does not include any manufacturers information about the proposed unit. It is not generally recommended to run detergent-containing water through an oil interceptor, as this will increase the efficacy of retention (encourage washout). From a pollution perspective, I would favour a drainage arrangement which discharges washwater to public foul system under a trade-effluent arrangement, via an oil-trap gulley to guard against the low risk of bulk release (e.g. from a low speed collision, or serious mechanical failure of a visiting vehicle). The Wastewater Treatment works are considered to be a more appropriate destination for effluent containing detergent, suspended solids, and organic contaminants (than is a local river).

The current proposals are considered to be too vague on the drainage strategy. This could be managed either;-

- i) by means of a pre-commencement condition requiring approval of a detailed drainage scheme (note, I would recommend that both the EA & LLFA be included on the consultee list when the applicant seeks to discharge), or
- ii) by means of a restrictive condition requiring the preferred drainage arrangement described above (i.e. to public foul via oil-trap gulley), or,
- iii) by requiring a detailed scheme prior to approval of the application - either by negotiating an extension of determination period, or following refusal or withdrawal, within a revised proposal. I would recommend that the EA & LLFA are included on the consultee list when the detailed scheme is received)

I also note the comments of the Arboricultural consultee with respect to the protection of the vegetative screen. Drainage is not the only potential source of harm to the planting - overspray of detergent containing water could be phytotoxic, or simply overspray of water in summer could lead to increased 'burning' of low foliage - as a result of solar lensing (through droplets). Given the noise objection (which may result in a need for screens), it may be appropriate to consider screening for over-spray to protect boundary planting.

Transport Assessment ('TA') & Air Quality

The TA uses the TRICS database to estimate the vehicle sales trips associated with the currently consented land use, and the trips likely to be associated with a car wash operation of a broadly equivalent scale to that proposed. In the absence of site-specific customer visitation surveys (e.g. from alternative sites operated by the applicant), it is industry standard practice to make use of TRICS data.

This assessment has shown that the net change in vehicular trips associated with the site will be +39 vehicle-trips/day, postulating that a non-negligible proportion of trips will be already present on the local road network (i.e. that trips will be linked with trips to other local services, diverted from other local facilities, or pass-by trips en-route to other destinations. I would agree that this is likely, and that in terms of both local emissions and the impact on local air quality, the change would be *negligible*.

It is possible that the net increase will be material from a highway safety (site access) perspective, but I am relying on other consultees to assess this aspect.

I note that a public respondent has made reference to the perception of London Road being busier now than ever - for context I have checked the available traffic count figures, and can confirm that the at the nearest count point the volume of traffic using the A3 London Road has decreased by >10% since the year 2000 (traffic volume change is -10% relative to yr. 2000 volumes), with a reasonably steady decline year-on-year.

This suggests that it is reasonable to assume some 'headroom' with regards new traffic demand, and would apply both in terms of emissions, and traffic volumes for highways considerations.

I would also anecdotally note that the proposed boundary screen planting (native trees in planters) would represent a marginal improvement to the present arrangement, offering a limited 'pollutant filtering & absorption' service. This element is considered to be marginally beneficial to local air quality, and so serve to offset to a small degree the additional emissions associated with the positive net change in trips associated with the development.

I have no air quality / emissions concerns.

Mr. Jonathan Driver
Environmental Control Officer