

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/19/00738	Your Ref:	APP/19/00403
EH Case Officer Extn:	44 6677	Date:	09 May 2019
DC Case Officer:	Lewis Oliver		
DC Case Officer Extn:	44 6263		
Application Number:	APP/19/00403		
Site Address:	Grainger Development Site Land West of, London Road, Waterloooville		
Proposed Development:	Formation of construction access and haul road for temporary period of 5 years, to facilitate construction for the West of Waterloooville Development approved under planning Ref: APP/10/00828.		

Observations / Comments:

I have reviewed the submitted documentation, inclusive of the drainage / SuDS provisions and the CEMP. It is acknowledged that there have been few issues with the development phases completed / underway, and that it is reasonable to assume that the site-wide CEMP provisions are being observed.

Traffic Routing

I note that the Milk Lane Traffic Count data returns an estimated average daily traffic (AADT) flow of <2000 vehicles. Similarly calculations for the Phase 3 access return an AADT of <200, and this is presented as being analogous to the expected use for the temporary access.

The Phase 3 access survey is unclassified, so the vehicle type split is unknown. It is reasonable to assume that it represents a high proportion of OGV1 & OVG2 (light & heavy delivery vehicles). I note that the traffic team has no concerns with regards to this level of usage, and in terms of the interaction- (conflict-) with the dominant flow on the A3, I would agree that no significant impact is likely. In emissions / air-pollution terms, this level of OGV usage (increase in OGV traffic on the A3) could in principle be significant for sensitive receptors in close proximity to the kerbside of the freight route, though I'd acknowledge that the degree of impact is substantially dependent on the age of vehicles in use.

The avoidance of Purbrook Village is welcome as a precautionary measure, as air-pollution sensitive receptors exist within 1.5m of the kerbside at this location. The traffic route proposed is considered to be the best available to minimise adverse impacts, and for this reason is supported.

Construction Environmental Management Plan (CEMP)

The CEMP document is comprehensive in scope. I have no specific comments to make, other than insofar as the drainage of the temporary access & control of runoff is relevant as a potential construction site impact (see below).

Drainage / SuDS (Design & Planning Statements / CEMP)

It is noted that paragraph 3.19 of the Planning Statement indicates that runoff control from the temporary access is heavily reliant upon Phase 8 SuDS scheme. It is understood that a discharge of conditions app was submitted Jan 2019, and it is implicit from the statements that this application was favourably determined. It is not clear whether the approved details have yet been implemented (or not).

The statements are taken imply that the temporary access 'requires' phase 8 drainage to be constructed as a prerequisite to the bringing into use of the temporary haul road (but not necessarily prior to it's construction). The means of drainage is relevant in respect of runoff control in consideration of the longitudinal gradient of the access, the incompatibility of site soils to accommodate infiltration drainage, the clay content of local soils, and the damp-down / wheel wash / wet clean / road sweeping provisions of the CEMP.

It is noted that the SuDS strategy (para. 1.12) indicates that phase 3B & 8 will drain (to the Wallington-) via existing features installed as part of phase 1, 7 & PRS works. The CEMP (para 2.4) confirms that these features are in place, and it is noted that a distance of around 600m exists between the site boundary and the discharge point to the River Wallington, allowing adequate opportunity for the settlement of suspended fines within the various intermediate SuDS features. Whilst this is the case, I can 't imagine that it would be desirable from a maintenance perspective to allow heavily contaminated (silty) construction site runoff to enter the existing SuDS.

The Phase 3B & 8 SuDS features represent the 'link' between the access road and the extant onward features. The SuDS design document indicates that these features are to be located outside of the residential area, some within 'town park' area, which is indicated to be 'under construction'. The status of these SuDS features is however unclear from documents presented.

Section 5.5 (item 18) of the CEMP refers to the installation of temporary drainage to 'ensure that no polluted surface water enters the field drains', and that 'any surface water collected to be directed via treatment before discharge'. It is unclear at this stage how this is to be achieved.

It would seem that phasing is a potentially significant issue, and it may be appropriate to seek to control this via a suitable condition (i.e. to ensure that the access is not brought into use until surface water discharge destination is brought on-line).

Equally, the inclusion of a method statement within the CEMP for the proposed means of temporary surface water drainage (including treatment) would suffice to demonstrate that the CEMP can be relied upon in this respect. If treatment is sufficient, it may be appropriate to rely upon existing highway drainage serving the A3 - negating the need to seek to control site phasing.

Conclusions

I'd reiterate the initial comment that few issues have arisen with prior construction phases, and that this should lend confidence that the risks of significant problems arising from silty runoff & mud-track-out are relatively small. It is a planning question as to whether the CEMP is considered to be enforceable in it's current form, or whether further detail is required on the means of attenuation, treatment & discharge for the temporary drainage systems referred to.

Mr. Jonathan Driver
Environmental Control Officer