

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/16/01279	Your Ref:	APP/16/00875
EH Case Officer Extn:	44 6677	Date:	15 September 2016
DC Case Officer:	David Eaves		
DC Case Officer Extn:	44 6549		
Application Number:	APP/16/00875		
Site Address:	Proposed Restaurant / Drive-Thru, Larchwood Avenue, Havant		
Proposed Development:	The erection of a drive-thru restaurant (Use Class A3/A5), car parking, access, servicing, landscaping, engineering works and ancillary works.		

Observations / Comments:

I have reviewed the supporting information to this application, namely the Design & Access and Planning Statements, Environmental Desk Study & Site Investigation Report, Drainage Strategy & Transport Assessment.

Transport & Air Quality Impact

The Transport Assessment does not quantify an expected daily increase in traffic levels, but does confirm a negligible-to-low peak flow impact amounting to 27/1400 approx. during network peak hour at the adjacent junction (<+2%).

The report did not specifically estimate daily average production / attraction (number of 2-way car journeys), 2015 survey data (available elsewhere) suggests an average PM peak flow : daily flow ratio of around 1:11.63, indicating a daily trip rate of approx. 849 (424 2-way trips). It is accepted that a proportion of new trips will represent a fraction of the daily figure, with the remainder consisting of linked, diverted, pass-by & transferred trips. The proportional estimates are considered to be broadly reasonable on aggregate.

Air Quality at the principal junction connecting the site to the strategic road Network (Purbrook Wy / B2150 Hulbert Road / ASDA) has been previously assessed, identifying no existing breaches of air quality limit values, nor any concentrations within 90% of any relevant limit or objective (assessment undertaken prior to recently completed junction improvements).

The Residential receptors closest to Larchwood Avenue are located some 35m from the kerbside. Over this distance, traffic related pollutants will be subject to significant dilution / dispersal, and as a result a significant increase in emissions would need to be associated with the Larchwood road link in order to represent either an acute exposure risk or a material adverse change. The level of additional daily traffic (conservatively taken as 30% of the 849 estimated total average, around 254) is considered unlikely to be of sufficient magnitude as to represent a material adverse impact upon air quality.

It is agreed that the site benefits from a excellent pedestrian & cycle links, adequate bus service provision, and is extremely well situated to maximise opportunities for linked, pass-by (diverted), and transfer trips (i.e. those already on the road network). In this way, it is considered that the travel plan measures have a reasonable chance of having a positive impact, and that a good number of customers will choose sustainable travel choices, or make efficient use of trips taken. No Adverse Comment.

Drainage Strategy

I note that the Drainage Strategy does not propose a scheme of SUDS disposal for SW runoff, due largely to unfavourable local geology.

Below ground attenuation tanks are proposed, discharging to existing SW network via vortex flow control / hydrobrake limiting outflow to 15l/s, or approx. 60% assumed existing runoff rate under 1 in 100 yr. conditions. I note that no allowance is stated as having been made for climate change, and the specific control structure not specified.

Submitted information indicates that the collection points are to be trapped, and that an oil interceptor unit is to be installed. Neither the type/class, manufacturer / model / spec, or location of interceptor is specified, and it is not stated whether roof water will be separated from surface water runoff (i.e. excluded from the interceptor). Similarly, the report does not address the provision for preventative or reactive maintenance provision, whether or not the unit will be fitted with high level alarms, or whether the party responsible (for maintenance) will be KFC, or a third party maintenance contractor (etc.).

No calculations are presented in respect of the attenuation tank volume required to achieve the stated rate, and indeed the volume proposed is not stated. Similarly, no scheme layout is provided within the drainage strategy, and the services layout does not appear to have been submitted on any other plan.

It is recognised that the proposed discharge is to public system, with the final discharge to watercourse at considerable distance (980m East), and thus accepted that there will be a reasonable degree of dilution en-route prior to release into the environment. In this way, inputs are less critical than they might otherwise be, and it may therefore be overzealous to require these details be secured by means of a prior to occupation condition in the interests of pollution prevention. The form of the drainage strategy clearly follows sustainable principles, and includes appropriate control structures. A bypass interceptor would be appropriate at this location / for this purpose, and it is arguably safe to assume that the selected unit would be appropriately sized for the area being drained.

The level of detail included in the drainage strategy is poor, however if consent for these proposals is granted contingent on development proceeding in accordance with the *principles outlined within* the submitted documents (including the drainage strategy), I would be satisfied that the site would be unlikely to represent a pollution risk with respect to controlled waters.

Environmental Desk Study & Site Investigation

In line with comments previously made by Environmental Health, the desk study did not identify any significant sources as being likely to be present.

The Site Investigation did however identify some non-construction related made ground (containing waste materials), characterised by elevated concentrations of various PAH's, (potentially associated with macadam fragments).

Concentrations identified were within the range of S4UL's for commercial premises, though for

some fractions, by the slightest margin. All of the carcinogenic PAH congeners were represented as elevated above typical background levels, with the exception of Naphthalene.

Petroleum hydrocarbons were elevated in the Diesel & Mineral Oil ranges. No light (petroleum spirit) fraction identified, indicating that there is a low vapour risk; however the lab schedule did not include quantification of the aliphatic / aromatic split, leaving the possibility of a non-inhalation (contact, ingestion, and particle inhalation) risk if the 660mg/kg DRO group were represented predominantly by mid fraction Aliphatics (C10-C12).

In addition, both Amosite & Chrysotile asbestos were found to be present in all samples scheduled for screening, in both free fibres and as fragments of asbestos containing materials. Quantifiable volumes of free fibres were identified in at least two samples (up to 0.004%). For context, waste is deemed to be hazardous where asbestos fibres exceed >0.1%. It is nonetheless considered that the proposed precautionary mitigation is appropriate, and that a robust discovery strategy / watching brief and construction dust controls should be employed during construction works. .

I agree that there are no specific or significant groundwater or other controlled water concerns, related to the contaminants identified in soils, and that note that the cover system specified for the purpose of mitigating exposures to Asbestos fibres (& containing materials) should be adequate to address the risks posed by Polyaromatic Hydrocarbon (PAH) species.

It is considered to be appropriate to require that the mitigation works are undertaken as proposed, and that a verification report be submitted. I have no objection to the granting of consent for the proposed scheme, subject to the following condition;

Implementation of Remedial Measures, and Verification Reporting (Bespoke)

The development hereby permitted shall be carried out in accordance with the recommended Remedial Works, Dust Control Provisions, and Construction Watching Brief outlined within sections 7.4 & 7.3.1 of the Crossfield Consulting Site Investigation Report Ref CCL02834.CA31 March 2016, unless otherwise agreed in writing by the Local Planning Authority.

Prior to the occupation of any relevant part of the permitted development, a verification report shall be submitted to and approved in writing by the Local Planning Authority. The report must demonstrate the quality of imported soils, the depth of cover achieved, and that any other relevant site remediation criteria have been met.

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], A degree of contamination has been identified as being present at the site as a result of both previous & current land uses (&/or activities) that could pose a risk to future site occupiers.*

Mr. Jonathan Driver
Environmental Control Officer