

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/16/01494	Your Ref:	APP/16/01036
EH Case Officer Extn:	44 6677	Date:	03 November 2016
DC Case Officer:	Heather Lealan		
DC Case Officer Extn:	44 6523		
Application Number:	APP/16/01036		
Site Address:	Langstone Gate, Solent Road, Havant, PO9 1TR		
Proposed Development:	Construction of coffee unit (Class A3).		

Observations / Comments:

I have reviewed the application supporting documents and scheme particulars. I would like to make comment in respect of contamination, geo-environmental risk, drainage provision (pollution) and traffic & transportation (travel impact & air quality).

Contamination Risks

The application area was formerly used as a mill pond serving Havant Corn Mill until approx. 1959 - Mill was demolished during construction of the A27 Havant By-Pass in the early 1960's, and Langstone Gate (Offices) was constructed in around 1985 on the previously undeveloped site. There may be some marginally elevated soil gas in the area as a result of increased proportion of organic matter within local soils, but nothing of material significance.

Land adjacent to the West, and to the North (North side of Solent Road) has previously been in use for potentially contaminating landuses. These sources have been investigated & remediated, and as a part of those investigations risks to the local water courses were considered & mitigated.

On the basis of the above, and despite the sensitivity of the local environment, I have no contamination concerns.

Geo-Environmental Risk

The application area falls within a groundwater source protection zone, and is within 50m of an spring that is believed to form part of the public water supply (source network).

I note that the proposed structure is a 1.5 storey building, so would assume it likely that the load bearing requirements for foundations will be modest. Nevertheless, the proximity to river & tributary courses, and the nature of the superficial alluvium (likely to be variable in terms of it's load bearing capacity & plasticity) may push design engineers towards the adoption of a piled

foundation solution in order to address uncertainty. Similar Buildings in the vicinity have adopted substantial piled foundations terminating in competent chalk in order to address these types of uncertainty.

No geotechnical details have been provided with the application as far as I can see, and it may be that specification of foundations has been deferred to follow the securing of consent.

The public water supply is extremely sensitive to short-term turbidity (which interferes with water treatment processes, and can lead to a requirement to limit throughput or shut-down filtration systems); and piled foundations - especially percussive / driven piles - represent a material short-term risk. Whilst not strictly 'pollution' in the chemical sense - it is considered to be analogous, and therefore reasonable to require be appropriately addressed.

If you are minded to grant consent for this scheme, (and in the absence of any competing requirements / wording from either the Environment Agency or Portsmouth Water Company); I would request that the following condition be applied:

Prior to the commencement of any specific phase of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), an assessment of the risks associated with proposed means of undertaking groundworks and construction shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall be undertaken by competent persons, and the findings presented as a written report.

The assessment may comprise separate reports as appropriate, but unless specifically excluded in writing by the Local Planning Authority, shall include;

- 1) An assessment of the local geological succession, sufficient to determine whether the principle aquifer falls within the likely vertical range of proposed excavations or foundations.*
- 2) The result of an appropriate assessment of risks based upon 1) in relation to proposed construction depths, methods & materials. Where potentially unacceptable risks are identified, a risk-based appraisal of construction method options and clearly defined proposals for mitigation of the identified risks.*
- 3) Contractors method statement(s) in accordance with mitigation proposals (2), and*
- 4) Where necessary, a scheme to appropriately monitor the impact of construction activity upon groundwater and/or surface waters, including details in respect of necessary stakeholder liaison*

Reason: *The site lies within the groundwater Source Protection Zone 1 for the Bedhampton & Havant Springs water supply. Deep excavations, Boring, Piling or any other foundations using penetrative methods can result in risks to potable supplies both from turbidity, and by creating migration pathways for pollutants &/or contaminants. It should be demonstrated that the proposed construction methods will not result in any unacceptable adverse impacts upon controlled waters. The condition is imposed having due regard to Havant Borough Local Plan (Core Strategy) 2011 policy DM10 and the National Planning Policy Framework 2012.*

Drainage Provision & Other Pollution Risks (Controlled Waters)

The proposals do not include any detail in respect of drainage provision. It should be noted that in addition to the above sensitivities (public water supply); the site also lies adjacent to a spring-fed unnamed tributary to the Lavant, known to support a healthy population of Water Voles, a BAP species.

It is not considered unreasonable given these local environmental sensitivities (and downstream internationally designated habitats), that the applicant be required to ensure that the

implemented drainage scheme does not represent a pollutant vector to the water course; whether the pollutants are presented by oil leaks from vehicles, or organic material associated with the food & drink business (e.g. customer spills, bins etc.).

To this end, if you are minded to grant consent for this scheme, (and in the absence of any competing requirements / wording from either the Environment Agency, the Local Flood Authority, or Southern Water Ltd.); I would request that the following condition be applied:

Construction of the development shall not commence until details of the proposed means of foul and surface water sewerage disposal have been submitted to, and approved in writing by, the Local Planning Authority in consultation with Southern Water. The approved details shall include a schedule of operational and preventative maintenance for surface water drainage structures, pumps, or separators required for either a) the proper operation of the system to its design flow rates, or b) for the effective retention of pollutants to prevent downstream release. Parties responsible for observing the maintenance plan shall be clearly identified within the plan, and the plan shall be implemented as approved.

Reason: *To ensure the effective operation of drainage system and in particular to prevent downstream flooding &/or pollution. This condition is imposed having due regard to Havant Borough Local Plan (Core Strategy) 2011 policy DM10 and the National Planning Policy Framework 2012.*

In the event that preferred wording is submitted by one of the consultees listed above, I would ask that you ensure that reference is made to the need to consider retention of pollutants to prevent downstream release.

In respect of other risks to controlled waters, it is likely that a specific EA permit will not be required for working within 8m of the unnamed tributary to the Lavant (East of the site) has not been classified as a main river. As is indicated above however, the ecology is sensitive, so I would nevertheless expect the applicant (or their nominated principle contractor) to take appropriate precautions in line with the principles of the (now withdrawn, but still relevant); EA Guidance documents, PPG5, "Works in, near or over watercourses: prevent pollution".

Transport Impacts (Air Quality)

I have reviewed the Icen Projects Ltd. Transport Assessment, and I share some of the concerns raised previously by Hampshire County Council Highways Development Team, and by Havant Borough Council's own development engineers.

In respect of the to average maximum queue lengths (per period), modelling outputs do not accord to anecdotal experience (personal, as a road user), whereby queue lengths on Park Road South Northbound, left turn lane to Solent Road) are known to back up some 175m to hinder entry to Park Road South from the A27 Havant Exit Roundabout. Maximum modelled queue lengths in the AM peak are in the order of 60m (assuming an average vehicle length of 4.5m) representing a reasonable disparity.

Similarly, queue lengths on Solent Road are known to occur in the order of 160m, modelled at around 32m. It is noted that even the modelled maximum queue length of around 32m will hamper a right hand turn from the site. Whilst the junction capacity assessment indicates that the site access has significant reserve capacity, it would appear that the assessment has not accounted for combined effects of network junctions (i.e. presented assessments assume a clear road to turn into).

I also note some anomalies & possible errors in allocation of trips, notably:

- No additional turns into Selbourne, Brockhampton Lane (North or South), or additional U-Turns at the Brockhampton Rd. Roundabout are accounted for in the 'proposed' traffic flows (i.e. all vehicles assumed free to route Left or Right at will from Langstone Gate, with no average proportion seeking to avoid the queuing Eastbound traffic on Solent Rd.)
- No additional vehicle movements are accounted for in proposed development flows (Westbound traffic on Solent Road turning left into Langstone Gate) under any scenario. Whilst the assessment accounts for diverted trips from this source, I see no justification for the implicit assumption for all new traffic to derive from the West.
- PM Peak 2021 Base + Committed + Proposed traffic at the Langstone Gate site access is shown as a reduction in both arrival & departure when compared with the 2021 Base + Committed (i.e. no development). It is assumed that the chart titling is in error, but this does erode confidence in respect of the other assumptions.
- Peak arrival / departure figures are discussed in fairly opaque terms - 40 arrivals, at 60% utilising the drive thru facility, is accounted for as 24 vehicles, one movement per 6-7 minutes (section 6.3). It is also stated that the peak 3hr period is expected to accommodate 70 vehicle arrivals - evenly distributed, equating to 22/hour; 60% drive thru (13), enter / exit within 3 mins each, therefore arrive + depart = 26 vph (Drive Thru), and the balance assumed to arrive and occupy a parking space (9) = 35 movements/hour, or one movement per 1m45s. The presented throughput would therefore appear to be an under-estimate.

I note that no account taken of total / overall increase in traffic in terms of the annual average daily flow (AADT).

Taking the AM peak hour of +40 arrivals (assumed 48 2-way movements associated with the drive thru', plus 16 (balance) to saturate parking capacity = 64 total 2-way trips in the peak hour); the AADT increase might be expected to be around +696, or 4% of existing flows on Solent Road [64 x 10.8854 ("AM Peak to AADT factor" calculated from a 2011 Automatic Count on Solent Rd.)]. In reality this is likely to be over estimate given the stated trading patterns, but this simple calculation is nevertheless illustrative of a non-negligible impact.

I also struggle with some of the terminology employed (which isn't simply semantics if it alters fundamental model assumptions) - for example, section 6.8 refers to *"new trips within the modelling assessment [being]...considered to be predominantly comprised of pass by and linked trips (not discounted from existing movements on the network)"* In this way, these trips are not being accounted for as new (additional) trips, they are being accounted for as pass-by and linked trips from the existing road network flows (not redistributed). The only 'new' trips accounted for are those *"diverted from outside of the study area"*, which are assumed (see bullets above) to be drawn exclusively from the West (Eastbound traffic on Solent Road).

From the above, it appears to me that the assessment does not fully account for the likely highway impact of the proposals.

From an Air Quality perspective, the proportion pass-by / diverted is probably not particularly significant - my principle concern is for the *combined impact* of proximal road junctions presently operating with minimal practical reserve capacity interfering with the operation of road junctions (such as the site access) which otherwise have no capacity issues. The potential for 'Grid lock' (already adequately described by HBC's development engineers) is a far more pressing issue in respect of air quality, especially given that roadside Nitrogen Dioxide concentrations on the Park Road Corridor are already known to be high, and the potential for further congestion having a knock-on effect on the functioning of the A27 Havant Exit Roundabout.

I am not convinced by the transport assessment that these issues are unlikely to be material, and would consider that not enough has been done to robustly demonstrate that the proposals

meet the Core Strategy Principle (not increasing congestion).

I could suggest access restrictions such as 'left-in-left-out' (LILO), however this will lead to cycling of traffic on reciprocal journeys (e.g. those diverted from Park Road South). "Left-out" movements from Langstone Gate access (on trips where occupants wish to travel via Park Road South) must necessarily find a suitable turning point - several possibilities exist (in distance order);

- Selbourne Road retail park mini-roundabout
- Tesco Access (internal) mini-roundabout, or fuel station
- Brockhampton Lane North (Wide junction with island, allowing U-Turn)
- Solent Road Retail unit Parking Area
- Brockhampton Lane Roundabout

The current model does not account for additional traffic movements associated with development traffic U-Turns at any of these locations, and the highway impact of LILO restriction would need to be assessed against it's alternative.

I would conclude that this is not a good location for a drive through operation, purely from the perspective of the proximity of the access to strategic & congested road junctions - it is not the overall increase in traffic per se that I am concerned about, more the potential disproportionate impact of traffic through junction traffic flow / queuing interactions; contributing to congestion, and disproportionately contributing to local road traffic emissions.

Mr. Jonathan Driver
Environmental Control Officer