

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/15/01100	Your Ref:	APP/15/00773
EH Case Officer Extn:	44 6677	Date:	02 October 2015
DC Case Officer:	Heather Lealan		
DC Case Officer Extn:	44 6523		
Application Number:	APP/15/00773		
Site Address:	Systems Technology Park, Elettra Avenue, Waterlooville, PO7 7XS		
Proposed Development:	Proposed Development: Erection of a restaurant/drive thru (Classes A3/A5) with associated parking, servicing, access and landscaping. (OA Consent = APP/12/00652)		

Observations / Comments:

I am aware that our comments on this one have been very much delayed, so i will keep this brief. Comments here related to SUDS, Contamination & Air Quality only - I expect that you will have already recieved comments on noise & cooking odours / extraction etc. under separate cover.

SUDS

I agree with the assessment that ground conditions are unlikely to be suitable to support an extensive SUD solution capable of handling runoff from the entire site. I note that some SUDS features are proposed within the Western portion of the development (not covered by this application), in the form of swales. It is expected that some consideration is given to preventing this feature from representing a 'sink' for chronic inputs of automotive related pollutants to soils via parking surfaces runoff, e.g. through the use of suitable out-flow controls & provisions for inspection & maintenance.

Ground Contamination Assessments

I have now had the opportunity to review the ground contamination assessments for this site, produced in 2008 & 2012, but not previously submitted in support of the pre-application discussions or outline application.

The 2008 desk study report provides a comprehensive & useful site walkover, which lends considerable confidence to the conclusions drawn within the later intrusive report. It is apparant that the site facilities, and especially tanks, containment features, and waste storage facilities were of recent age, well constructed and in good condition. There appears to have been very good housekeeping and disciplined working practice as might be expected of such a sensitive activity.

Generally speaking, the 2012 intrusive report (based upon the desk study) placed trial holes in positions suitable for the interception of contamination associated with identified features, as well as providing general site coverage.

The site was operational during the investigation however, and to some extent access was limited. In consideration of the scale of the site the number of trial holes was also relatively small, though the suite of testing was comprehensive & appropriate to the previous use of the site.

Some elevated determinands were reported, but not at levels likely to be of significant concern; though some exceedances of quality standards were identified within soil leachate & groundwater samples. These are considered likely to be related to parent strata rather than site activities, but this cannot be ruled out.

The report similarly identified some soil gas anomalies, notably oxygen depletion to levels <9% v/v in some cases, indicative of net consumption by either soil biota or chemical oxidation - this could potentially be an indication of an unintercepted source, or could be related to recent fluvial deposits. As the trial holes were not immediately proximal to the culverted surface water, I inclined to treat this result with a degree of caution.

In summary, the reports are largely very favourable, with no physical contamination positively identified, and providing a good deal of evidence to suggest that significant contamination is less likely at this site that might otherwise be expected for a site of this scale / use class - largely owing to its age and management. However, as is acknowledged in the report, there remains large areas of the site that have not been directly investigated, and as indicated above, a source of contamination at the site cannot be completely ruled out on the basis of the available reports.

It is not considered that these residual uncertainties are sufficient as to justify additional proactive investigation, however it would be appropriate to require that a watching brief be maintained throughout development in order to ensure an impetus to appropriately deal with any contamination identified during groundworks.

If development control are minded to grant consent for this application, I would recommend the following condition be applied;

"In the event that soil or groundwater is encountered during groundwork that is suspected of being contaminated (including discolouration, oils, sheens that are oily, metallic or brightly coloured, foul or solvent odours, or deposits & inclusions comprising obvious waste materials), or if groundwork staff report acute symptoms (skin, eye or respiratory) suspected of being related to soil quality; works in affected areas of the site shall cease until a scheme to deal with the risks associated with the suspected contamination has been submitted to and approved in writing by the Local Planning Authority.

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

- 1) A site investigation in the vicinity of the suspected contamination, of a scale sufficient to characterise its nature, and likely origin, extent & mobility*
- 2) An appropriate assessment of the risks to all receptors that may be affected, including those off site.*
- 3) Where the Risk Assessment (2) identifies potentially unacceptable risks, a*

Remediation Strategy that includes;

- appropriately considered remedial objectives, and;*
- clearly defined proposals for the remediation &/or mitigation of identified risks, having due regard to sustainability*

4) Where a remediation strategy (3) identifies actions required to remediate contamination or mitigate risks associated with the presence of contamination, a Verification Report that includes;

- Photographic documentation of any relevant physical works, sampling/monitoring results, and any other technical or statistical information as may be required to demonstrate that Remediation Strategy objectives have been met, and where necessary;*
- Further plans for monitoring, provision for maintenance of barriers or other structures required for remediation or risk mitigation, and any relevant trigger values and contingency actions as may be required to address the identified risks (a "long-term monitoring and maintenance plan").*

All assessments, works, monitoring & other actions required by (1)-(4) above shall be undertaken by competent persons, and the scheme shall be implemented as approved"

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); there is a low probability of the presence of Contamination associated with previous R&D activities at the site that could, if present, pose a significant risk to surface waters"

Air Quality

I have reviewed the revised Transportation assessments, and junction capacity assessments and considered these alongside the previous Transport Assessment for the whole site. The recent assessments are broadly similar in terms of trip rate estimates, and notably, the assessments are based upon conservative assessments that assume all generated trips are entirely new to the road network.

The report identifies some junction capacity issues & increased queuing, particularly within the PM peak on Hambledon Road (North) and Elettra Ave. A tangible increase in que length & delay at Milton road is also identified within the AM peak.

Sensitive receptors are located at the southern end of Milton Road, and between 120 & 130 Hambledon Road, where properties are several meters forward of the general building line. The closest receptor to traffic on Elettra avenue would be the Little Acorns nursery.

Notably, all sensitive receptors are either >100m distant from projected traffic queues, set well back from the main carriageway, or both. Whilst a moderate highway impact is predicted in association with this site, a worst case assessment appears to indicate that this is unlikely to materially impact local air quality at a relevant location. My previous comments (from APP/13/00893) are considered to remain valid. Further detail is included in that consultation response, but in relation to air quality, is summarised as below:

I would tend to agree that the mixed use nature of the proposals creates significant potential for cross visitation and linked trips, as well as opportunities for diverted / pass-by trips; and would agree that the adjusted rates discussed later in the report are likely to be appropriate, subject to a suitable provision of parking being agreed.

The principles underpinning the traffic trip rate adjustment (i.e. proportion of linked / diverted / pass-by trips) are however strongly dependent upon the provision of parking both in terms of absolute number of spaces, and in terms of the segregation / allocation between landuses (or lack of it) and the management (enforcement) of parking. *Over-provision of spaces, or restrictive parking management has been shown to be capable of negating any potential trip generation reduction. As such, parking standards & management need to be carefully considered.*

It is expected that Hampshire County Council will pick this up as a highway capacity issue, but it is possible that this could be dealt with by means of a suitable condition.

It is not considered necessary to undertake a specific air quality assessment for these proposals.

A handwritten signature in blue ink, appearing to read 'Jonathan Driver', with a horizontal line underneath it.

Mr. Jonathan Driver
Environmental Control Officer