

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	DCS/EH/JPD/131002001	Your Ref:	[As Application No.]
Ext. No:	6677	Date:	02/10/2013

DC Case Officer: Ms. Aaron Wright

Application Number: APP/13/00893

Site Address: BAE Systems Technology Park, Elettra Avenue, Waterloo, PO7 7XS

Proposed Development: Outline application for mixed-use employment, leisure and retail development to comprise demolition of Main Building and erection of Class C1 hotel, Class D2 cinema, 3No. Class A3 restaurants, Class A4 public house, Class A3/A5 drive-thru restaurant, Class A1 foodstore and retention of E Block for use as Class B1 offices or conversion to Sui Generis bowling complex, Class D2 health and fitness centre, and Class A3 restaurant.

Observations / Comments:

I have looked over the submitted masterplan, the proposals for redevelopment, and the submitted Transport Assessment Report from Peter Brett Associates; and would like to provide some comments with regard to both ground condition & air quality.

Ground Conditions

It is understood that these amended proposals include provision for the retention of the 'E Block' and 'Beam Plot' buildings, the former to be converted to leisure / retail use.

The recent use of the buildings included within the scope of this application has been for an industrial purpose – Apparently a B1b & B1c use, but it is noted that the transport assessment refers to the Beam Plot as having a Sui-Generis (industrial) use.

I am not aware of the specific business activities carried out at the site since it's construction [between 1982 & 1991], however I am aware that it was marked on mapping as being 'research & development' for Marconi.

Submitted reports suggest that the 'Main Building' was used solely for office accommodation, with industrial uses restricted to the units to be retained. This accords with the positions of the mapped above ground storage tanks.

The description 'R&D' [activities] may refer to entirely innocuous activities not involving the handling or use of potentially contaminating substances; laboratory activities (whether electronics / materials science, or other) may indeed involve the use of chemicals that could potentially be extremely hazardous to both human health, and the wider environment. It is considered possible therefore that activities on this site have the potential to have resulted in a degree of ground contamination. Whilst this is likely to relate more specifically to the industrial type units (E Block & beam Plot), there is little available information to confirm this assumption.

The demolition statement submitted with the prior notification for demolition (APP/13/00940), referring only to the main building & minor single storey structures, makes reference to 'beneath ground features' [being filled in], implying that there might be below ground operational areas present within the buildings forming part of this development, which given the consented B1b

use classification (R&D activities) could refer to test tanks / pits that are typically associated with contamination hot-spots.

In terms of human health, the proposed site uses (leisure, food & hotel accommodation) are not considered particularly sensitive, however there are commercial land use standards, and there may still be a degree of risk to future employees from exposure to any contamination that might be present at the site.

With respect to the wider environment, the site is not within a groundwater protection area, and indeed is classified as a 'non-aquifer'. However, the local geology is [clay] head deposits (superficial) and London Clay (bedrock), and both of these geological units are locally heterogeneous and may contain significant sand or gravel deposits which may permit migration of contamination. These units may also make an important contribution to the base flow of the nearby watercourses, one of which bisects the site within a culvert oriented NNE/SSW.

This channel may be considered by the Environment Agency as a 'controlled water', as it feeds into a wider channel, feeding into the Wallington River, and passing through a number of sites important for local nature conservation (SINC's) further downstream.

Both 'general industrial' and 'laboratory / research facilities' could reasonably be considered potentially contaminating, and whilst the nature of the proposed development is not particularly sensitive; it is considered both prudent & reasonable to establish the ground conditions and any the degree of associated risk to both local surface waters and human health are considered as an integral part of the site re-development.

It is envisaged that an assessment would be iterative, and proportionate to the risks; and it may not need to proceed further than a desk study or phase 1a preliminary investigation to prove the absence of gross contamination –screening levels appropriate to the subject receptors would apply.

Whilst I would have no objection to these proposals as they stand, if development control were minded to recommend that consent is granted for the scheme, I would request that the following conditions be applied:

Condition 1

Prior to the commencement of the 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), a scheme to deal with the risks associated with contamination of the site shall be submitted to and approved in writing by the Local Planning Authority. That scheme shall include the following elements unless specifically excluded, in writing by the Local Planning Authority.

1. A desk study identifying:

- *All previous uses*
- *potential contaminants associated with those uses.*
- *a conceptual model of the site indicating sources, pathways and receptors*
- *potentially unacceptable risks arising from contamination at the site.*

2. *A site investigation scheme based on (1), if required, for the purpose of informing an appropriate assessment of the risks to all receptors that may be affected, including those off site.*

3. *The results of the site investigation and risk assessment (2) and if appropriate, a method statement based on these results giving full details of all remediation & risk*

mitigation measures required, and how they are to be undertaken (a “remediation strategy”).

4. A verification report or statement shall be prepared (as appropriate) on completion of the remediation or risk mitigation measures set out in (3), confirming that measures have been undertaken in accordance with the method statement and setting out any requirements for longer-term monitoring of pollutant linkages, maintenance arrangements and contingency action.

All elements shall be adhered to unless agreed in writing by the Local Planning Authority.

Reason: To prevent future site employees being exposed to unacceptable risks from potential contamination; and to mitigate the risks to local surface waters from contamination arising on the site from previous land uses. This condition is in line with paragraphs 109 and 121 of NPPF, and to policies and proposals E1 of the Hampshire County Structure plan 1996-2011 (Review), and DM10 of the Havant Borough Adopted Core Strategy (2011)

Condition 2

“If, during development, contamination not previously identified on site is found to be present, no further development shall be undertaken until a report has been submitted to and approved by the Local Planning Authority detailing how that contamination is to be dealt with. Unless otherwise agreed in writing with the Local Planning Authority, all works outlined in the submitted report shall be adhered to.”

Reason: To ensure that risks from land contamination to the future users of the land and controlled waters are minimised, and to ensure that the development can be carried out safely without unacceptable risks to workers.

Contamination issues should be considered in the context of any SUDS [sustainable urban drainage] scheme proposed, and I would suggest that the opinion of the Environment Agency on the sensitivity of the surface water body would usefully form a part of the Desk Study Report in order to appropriately account for the environmental risks, or lack thereof.

Air Quality

I have reviewed the Peter Brett Transport Assessment Report (TAR) for Ellettra Avenue, W'Ville (Ref:29169/Rev- Sept 2013) with a view to determining whether an air quality assessment should be required for this scheme. This TAR is based upon the same traffic survey information as for the previous scheme, but has been updated to relate specifically to the revised landuse mix (leisure / restaurant / retail) that is the subject of this application.

Section 3.6 makes reference to an Automatic Traffic Count (ATC) survey undertaken in April 2012 – this has not been provided with the report. I have requested a copy, however in the absence of that information, and to avoid further delay in responding to this application; I have used data from a recent ATC undertaken on the Hulbert Road to derive a local Peak Period to AADT factor for both AM & for PM peaks. I have used the maximum derived values for each link / movement / road (as appropriate) in order to provide a conservative estimate of expected annual traffic generation (production / attraction) of the development, for the purposes of Air Quality Screening.

The baseline peak flows used in the report for comparison purposes are based upon an assumed full occupancy of the site – this was agreed with HCC for the highways capacity assessment. It is noted that currently the subject site is significantly under-used, and actual

production / attraction (P/A) figures for the extant use will be far lower than a full occupancy with the consented uses (approx. 85% site traffic reduction presently cf. full occupancy) – the true AQ impact of the development will therefore be from the reduced (existing) baseline; and as a conservative assessment, I have made calculations based upon the unadjusted / un-mitigated gross generation potential.

Baseline Traffic

In terms of baseline assumptions (for TRICS peak P/A estimate), that the staff restaurant should not contribute to baseline figures, and B1b / B1c trip rates should be used as a surrogate for the Sui-Generis light industrial & R&D uses for the main Building, E-Block & Beam-Plot) are agreed, though as above, the baseline figures will be ignored for the purpose of an initial coarse screening exercise.

Development Traffic (Completed Scheme – Operational)

TRICS has been used to determine likely peak hour vehicle flows – this is a standard approach and is agreed. Some brief notes on results are below;

- Gym: Likely strong evening bias w/flows expected to extend well beyond the PM commuter Peak Flows. Business likely to provide good opportunity for pass-by / diverted trips from the PM commuter peak (arrive) to post-PM commuter peak (depart)
- Bowling / PH / Restaurant / Cinema: Land-uses notably do not contribute to AM commuter peak, and in all likelihood will not generate peak traffic at a time coincident with peak PM commuter traffic flows (approx 18:00 peak).
- A5 Hot Food Takeaway (Drive Thru): Peak flows likely to be strongest at the (technically) inter-peak (13:00-14:00pm), and PM peak periods, but with traffic flow generation extending beyond the commuter peak. Good opportunity for pass-by / diverted & linked trips.
- Hotel: Hotel landuse is not typically high turn-over, and does not tend to have a strong (peak traffic generation) bias toward periods coincident with commuter peak periods.

From an Air Quality perspective, developments that even-out traffic flow tend to have a reduced impact when compared with strongly 'tidal' flow (e.g. AM in, PM out – such as for a development of industrial estate or large office). Coupled with the TRICS research conclusion that discount retail tends to be linked with visits to higher-end food retail outlets (i.e. strong possibility of diverted trips), and a strong tendency for diverted & pass-by trips to be made to food retail outlets – the adjusted rate of 50% (50% traffic already on / accounted for on the road network) would appear credible.

I would agree that the mix of leisure uses proposed promotes natural opportunities for linked trips / cross visitation, and it is noted in the report (5.4.13) that TRICS report 05/1 concludes that Multi-use sites with 4 or more development types reduce the total P/A by an average of 20%.

I have read the attached TRICS report, and note that these benefits are strongly dependent upon the provision of parking, in terms of absolute number of spaces, segregation / allocation between landuses (or lack of it), and management (enforcement) of parking. *Over provision of spaces, or overly tight / restrictive parking management has been shown to be capable of negating any potential trip generation reduction. As such, parking standards need to be carefully considered.*

In consideration of the above, 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. 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.

Net Traffic Impact (Gross)

The gross impact of the development on annual average flows has been assessed using a course screen, utilising:

- mapped AADT traffic estimates from other developments (2012 baseline)
- expanded peak flow manual counts from the Peter Brett Associates report (2012 baseline), where other figures were not available,
- Junction turning proportions presented in the Peter Brett Associates report, and;
- expanded peak development P/A estimates from the Peter Brett Associates report (opening year operational traffic)

Gross impact (before adjustment, or mitigation) has been derived as:

- 50.07% flow increase (5203 AADT against 10392 AADT Base Flow) for Elettra Avenue East of Waterberry Drive
- 8.21% flow increase (1656 AADT against 20183 AADT Base Flow) for B2150 North of Milton Road
- 8.21% flow increase (2582 AADT against 31462 AADT Base Flow) for B2150 South of Milton Road
- 8.21% flow increase (965 AADT against 11762 AADT Base Flow) for Milton Road

Need for an Air Quality Assessment

EPUK Guidance (Planning for Air Quality) establishes that the decision as to whether or not an AQ assessment is required should account for the physical characteristics & scale of the development, changes in traffic flows, and the sensitivity of the area.

The guidance provides some criteria under which an air quality assessment would normally be required, most notably, where proposals are likely to lead to increased congestion, proposals that will create significant new car parking provision, and 'significant' traffic flow increases anywhere on the local road network.

Significant is defined for screening purposes as a flow increase >10% where base flow exceeds 10,000 AADT.

With reference to the criteria outlined above;

- The proposals will minimise likelihood of 'tidal' AM/PM vehicle flows, and minimise new trip generation during commuter peak flows.
- There is no reason to suspect the proposals will significantly alter the vehicle mix using the local network – leisure, retail and food uses would tend to attract passenger car users (PCU's), and have a relatively low turnover of LDV's/MDV's & HGV's.
- The local highway network has sufficient capacity & width as to be unlikely to experience significant congestion as a direct result of the proposals.
- Gross flow increases on Milton Road, Hambledon Road (B2150) both North & South of Milton Road fall below the 10% screening threshold
- Both Elettra Avenue West of Waterberry Drive, and Waterberry Drive are estimated to carry less than the 10,000 AADT screening criteria (2258 & 7885 AADT respectively)
- Flow increases on Elettra Avenue (Between Hambledon Rd & Waterberry Drive) will be significant, against a base flow that exceeds the 10,000 AADT screening value

With reference to the context of the area, there is no relevant exposure at Elettra Avenue between Waterberry Drive & Hambledon Road, the nearest relevant exposure being 100m distant (Little Acorns Nursery).

When considered alongside the physical characteristics of the area, and the sensitivity to changes in road traffic emissions (where screening criteria are exceeded); it is considered unlikely that any significant air quality impact would be identified as a result of this development

at a relevant location. This is based upon gross, unmitigated P/A assumptions. The inclusion of:

- a 20% reduction factor for cross-visitation (all uses except discount food),
- a 50% discount food 'pass-by'/'diverted' trip factor, and
- a suitable factor for PCU reduction measures detailed within the Framework Travel Plan (-8.8% & -1.4% AM & PM Peak Flows, respectively),

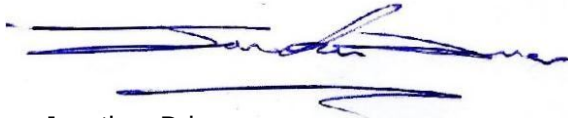
...could reasonably be expected to result in an positive impact upon the gross development P/A AADT estimate.

It is noted that when all of these measures are accounted for, the Net flow increase estimate (adjusted / mitigated) remains above +25% On Elettra Avenue, East of Waterberry Drive, and would still require an Air Quality Assessment if sensitive receptors were present.

Air Quality - Conclusions

Under the rationale outlined above, and in the context of the EPUK guidance document ('planning for air quality'), it is not necessary to undertake an Air Quality assessment for this development.

Best Regards,



Jonathan Driver
Environmental Control Officer