

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/22/03427	Your Ref:	APP/22/00837
EH Case Officer Extn:	44 6677	Date:	21 April 2023
DC Case Officer:	Arleta Miszevska		
DC Case Officer Extn:	0 996		
Application Number:	APP/22/00837		
Site Address:	Land at Cowplain School, Hart Plain Avenue, Waterloooville		
Proposed Development:	Erection of a 64 bed care home (within Use Class C2) and 6No. dwellings (within Use Class C3) with associated works including access, parking and landscaping		

Observations / Comments:

My apologies for the late comments on this application – this is one of a number of consultation tasks for which neither a start date or due date were recorded (at our end), meaning that the tasks were incorrectly placed in the task list order.

I have now reviewed the supporting documents for these proposals, and would like to add some brief comments to those already submitted by my nuisance & amenity colleagues.

Contaminated Land Assessment

The Lister's Geo ground investigation report no. 21.02.014 was predominantly authored for the purpose of informing geotechnical design, but did include a contamination desk-based assessment, site walkover, and a limited intrusive investigation which was proportionate to the source-risks identified (made ground associated with prior- & extant- construction, historic local storage of liquid fuels, and ad hoc vehicular sources).

The intrusive investigation identified few contaminants present at concentrations greater than the background range. One result identified an exceedance of Dibenzo(a,h)Anthracene on the site of the proposed C2 residential development, dismissed on the basis of an alternative site specific assessment value derived using the standard CLEA model (in accordance with Environment Agency guidance) for a less sensitive exposure scenario (adults of advanced age class).

The assessment is not reproduced within the report, but I do consider that the alternative target value derived is within a plausible range given the proposed exposure scenario. It is also noted that a change to that exposure scenario would require further planning consent, providing reasonable confidence that the less-sensitive exposure scenario will apply for the foreseeable future.

Ground gas screening did not identify any values of concern, and no visual or olfactory evidence of contamination was noted. The report concludes that neither further assessment nor remedial measures are necessary, and this conclusion is accepted.

I note the dialogue with the Archaeology consultee with respect to the possibility of air raid shelter's being present within the development red-line. Air raid shelters are often constructed partially below ground, and so their locations are often associated with localised burial of waste materials.

I have reviewed the available resources, and it would seem likely that any such structures formerly present were likely to be associated with the original school site, to the East of the development land. The development land was not associated with the school in the latest available pre-war mapping (1934), and no indications of raised earthworks or structures are present on the earliest available post-war mapping (1953). Unfortunately, the 1944 aerial survey did not come this far north, so there is a relative paucity of information relating to the period between the available map issues – the earliest available planning record would appear to date from 1956, for example.

I also note the results of the MACC International UXO risk review, concluding low risk but also recommending UXO safety awareness be included within site induction. The greenfield nature of the C2 development land, and the suggested potential presence of former air raid shelters within the playing field land (which are sometimes associated with small munitions originating from home guard operations) would suggest that the precautionary recommendation is not unreasonable.

To cover these marginal uncertainties, it is appropriate to recommend a compliance condition which simply imposes a duty to report & appropriately manage any significant contamination encountered during groundworks (e.g., finding made ground associated with infilled air-raid shelters, buried asbestos from demolished teaching buildings, etc.). The condition is necessarily comprehensive to cover the event of a discovery, but in the absence of any discoveries it's requirements are minimal. It serves simply to reinforce the developer's liability under NPPF 2021 para.184.

Condition 1 [Contamination Watching Brief]

"Reasonable vigilance for the presence of contamination and soil hazards shall be maintained during all groundwork. In the event that any suspected contamination (obviously contaminated, stained, discoloured or odourous soil/groundwater), items suspected to be possible unexploded ordnance-, or any significant buried waste material is encountered during groundworks; works in affected areas of the site shall cease until the Local Planning Authority has been notified of the discovery and 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 take a proportionate approach to the degree of formality adopted and may comprise separate results / reports / statements as appropriate, but unless specifically excluded by agreement shall include;

- 1) Investigation in the vicinity of the suspect material, sufficient to characterise it's nature, likely extent & mobility,*
- 2) An appropriate assessment of the risks to all receptors that may be affected, based upon 1), and;*
- 3) Where potentially unacceptable risks are identified by 2), a Remediation / Risk Management Strategy that includes appropriately considered remedial objectives and clearly defined proposals for achieving these, having due regard to sustainability*

All investigation, assessments & other actions required by 1)-3) above (and B, below) shall be undertaken by competent persons, and the findings presented in a written format. The scheme shall be implemented as approved.

Prior to the occupation of any relevant part of the permitted development, EITHER of the following shall be submitted to the Local Planning Authority;

- A) A written statement confirming that no suspected contamination was identified during development, OR;*

B) *Documentation in accordance with 1) & 2) above; together with a Verification Report (where appropriate) which demonstrates that the agreed remediation objectives (3)) have been met.*

Reason: *There is a low probability of encountering discrete deposits of buried materials associated with historic air-raid shelters &/or the demolition of buildings previously present adjacent to development land. The dates that these features were present would suggest that deposits might include high risk materials such as asbestos which could pose an acute risk to future residential occupiers. This is in line with DM10 of the Havant Borough Local Plan (Core Strategy) 2011, DM17 of the Havant Borough Local Plan (Allocations) [2014], and paragraphs 183-185 of the National Planning Policy Framework 2021."*

Air Quality Relevant Features, and Occupant Exposures

I have briefly reviewed the Turley Sustainability statement, and I note a number of air quality relevant design features, the most significant of which is all-electric servicing for both C2 & C3 use classes, eliminating local combustion processes for space & water heating.

The local policy environment (LP2036 status) is acknowledged, as is the reasonable contingency to the minimum BREEAM rating required to meet the 'very good' status. The design ethos is *supported on air quality grounds*.

I have no concerns about air quality exposure in this location. *No objections arise.*

Mr. Jonathan Driver
Environmental Control Officer