

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From: Environmental Health **To:** Development Control

Our Ref: CONS/21/00302 **Your Ref:** APP/20/01127

EH Case Officer Extn: 44 6677 **Date:** 11 May 2021

DC Case Officer: Lewis Oliver

DC Case Officer Extn: 44 6263

Application Number: APP/20/01127

Site Address: Mill Rythe Holiday Village 16 Havant Road, Hayling Island,
PO110PB

Proposed Development: Application for full planning permission, pursuant to APP/16/01237, for the redevelopment of the holiday site including the demolition of redundant chalets, use of land for the siting of 112 holiday caravans with areas of open recreational space, cease the use of the land for pitch and putt purposes and retain the remaining pitch and putt area as a managed wildlife area including the provision of an ecology bund & ditch, landscaping, the siting of three bird hides with bat roost in their roof spaces and a mown 'circular wildlife walkway'.

Observations / Comments:

I have reviewed the application documents alongside the responses of relevant consultees. I note that others have requested specific conditions in respect of SuDS and approval of a Construction Management Plan. The proposed conditions will be adequate to address any pollution control concerns that Environmental Health might have, and I have no additional comments to add.

Air Quality

The marginally expanded travel demand is likely to be negligible in air quality terms.

Contamination

I note that the Planning Statement refers to condition 12 (Contamination assessment and remediation / risk mitigation) & condition 13 (verification) of APP/16/01237 as having been discharged under applications dated January, April, and June 2018.

I would highlight that Environmental Health recommended a spatial discharge of APP/16/01237 c.12 in relation of a spatially limited area of the application red-line area, broadly corresponding to the 10 constructed units referenced in this application. See CONS/20/00677 dated 17/04/2020, which recommended discharge in respect of *the area indicated on plan no. 4356-500-ph1 (Sept-19) identified by the 'red-dashed-hatch' mark-up.*

My understanding is that the current application includes land previously included within the APP/16/01237 consent where c.12 & c13 still apply. For this reason, I have no objection to the current proposals subject to the general principles of these conditions being transposed to any consent granted.

I would suggest a revised wording for c.12 to reflect the submissions to date (EDS & UXO Risk Assessment), wording as below. I have also reproduced the wording of c.13 below, for convenience. Reason has been updated for consistency. Both conditions are required.

C.12 (Contamination)

Contamination (Standard – omitting EDS, based upon submitted EDS proposals) [1]

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 nature and extent of contamination at the site, whether originating from within or outside the curtilage, shall be submitted to and approved in writing by the Local Planning Authority.

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

- 1) An intrusive site investigation based on the proposals outlined within the ASI Ltd. Preliminary Ground Contamination Risk Assessment Report Ref: R17-12377/ds Aug 2017 Rev.1.0; to provide sufficient data and information to adequately identify & characterise any physical contamination on or affecting the site, and to inform an appropriate assessment of the risks to all identified receptors.*
- 2) The results of an appropriate risk assessment based upon (1), and where unacceptable risks are identified, a Remediation Strategy that includes;*
 - appropriately considered remedial objectives,*
 - an appraisal of remedial &/or risk mitigation options, having due regard to sustainability, and;*
 - clearly defined proposals for mitigation of the identified risks.*
- 3) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out any Remediation Strategy required under (2) are complete, identifying any requirements for longer-term monitoring of pollutant linkages, maintenance of engineered mitigation measures, and arrangements for contingency action.*

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

Reason: *To ensure that the development does not contribute to, and is not put at unacceptable risk from- or adversely affected by-, unacceptable levels of contamination, in line with policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011, DM17 of the Havant Borough Local Plan (Allocations) [2014], and paragraphs 178-180 of the National Planning Policy Framework. Contamination may be present at the site as a result of both previous & current land uses (&/or activities) that could pose a risk to future employees & guests at the site, and/or to adjacent sensitive environmental receptors.*

C.13 (Verification)

Prior to the occupation of any relevant part of the permitted development, any verification report required in accordance with condition 12 shall be submitted to and approved in writing by the Local Planning Authority.

The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan, and must demonstrate that site remediation criteria have been met. Where longer-term monitoring of pollutant linkages is identified as being necessary, the report shall clearly set out plans for monitoring, provision for maintenance, relevant triggers and contingency actions (a "long-term monitoring and maintenance plan").

The long-term monitoring and maintenance plan shall be implemented in accordance with the approved details.

Reason: *To ensure that the development does not contribute to, and is not put at unacceptable risk from- or adversely affected by-, unacceptable levels of contamination, in line with policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011, DM17 of the Havant Borough Local Plan (Allocations) [2014], and paragraphs 178-180 of the National Planning Policy Framework. Contamination may be present at the site as a result of both previous & current land uses (&/or activities) that could pose a risk to future employees & guests at the site, and/or to adjacent sensitive environmental receptors."*

Mr. Jonathan Driver
Environmental Control Officer