

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/20/00446	Your Ref:	APP/20/00061
EH Case Officer Extn:	44 6677	Date:	02 April 2020
DC Case Officer:	Daphney Haywood		
DC Case Officer Extn:	44 6513		
Application Number:	APP/20/00061		
Site Address:	Unit 3, Station Approach, North Street, Emsworth, PO10 7PW		
Proposed Development:	Proposed two storey extension to warehouse and parking platform.		

Observations / Comments:

I have reviewed the application supporting information, alongside comments from key consultees, and the public.

I note the deficiencies in the level of detail included in the application that have been highlighted by other consultees/respondents. I will refer to these only where relevant to my review.

Flood Risk / SuDS (Pollution)

The LLFA comments / recommendations adequately cover the need for further detail in respect of pollution control.

I am unclear why the Environment Agency has chosen to 'no adverse comment' this application following review of the FRA. I would tend toward the view of the LLFA.

The LLFA refers to the SuDS disposal hierarchy, and in this respect I would point out that the contamination conceptual site model would weigh substantially against the use of infiltration drainage at this site for surface water disposal. Environmental Health is likely to object to an infiltration strategy in the absence of significantly more robust site investigation information to support (i.e. indicating that it is appropriate to determine an acceptably low risk to off-site receptors).

Transport Assessment ('TA') / Impact (Air Quality)

It is noted that public consultees have raised concerns about the intensified use of Sultan Road contributing to local pollution. I also note that Network rail has material concerns which would be better characterised as 'highway capacity' concerns relating to the impact on access to railway land / assets.

I have reviewed the submitted transport assessment, and would broadly agree that the development land is 'highly accessible', with generally good pedestrian & cycle links, and excellent proximity to public transport (rail and bus).

Section 2.7 of the TA refers to 'Pedestrian footways within Sultan Road'. I note that this is only true as far as the pedestrian platform access, and beyond here access is via shared surface serving pedestrians, cyclists, private motor cars & HGV's. A significant intensification in the expected number of pedestrian trips might warrant some consideration of pedestrian safety, at least within the red-line area.

Section 3 addresses the traffic impact of the development, with figure 6 indicating a very low number of movements which is expected to be entirely unchanged by the proposed development.

I am unclear on how a development of this scale is expected to lead to a net-zero increase in transport demand and could remain economically justifiable. The origin of the existing figures is unclear, as is the expected trip demand (e.g. no TRICS estimates presented, no specific indication of staffing levels, etc.). It is similarly unclear whether the values are intended to represent 1-way or 2-way trips - one way is assumed given the odd numbers, the text comment describing the tidal nature of staff transport trips, and the notice on gates indicating evening closure for security purposes.

The provision for parking for private motor vehicles is equal to the total daily trips expected (including the HGV trips), which would seem like an over provision given the unusual construction details needed to achieve those spaces.

As a result, I have low confidence in the numbers presented, but (unless they are wildly misleading-) they are nevertheless indicative of a relatively low transport demand. It is considered that the net increase in transport demand represented by the proposed development will be negligible with respect to emissions / local air quality. I would expect however that the submitted TA is unlikely to satisfy network rail in its present form.

I would also highlight that the tracked HGV turning movement shown in the TA does not appear to be feasible - see the cross section drawing for the probable manoeuvre, which relies upon land not within the red-line for the development. I am unclear as to whether this is permissible in planning terms (or not) - it is not material to pollution / emissions / air quality - this comment is intended as an observation only.

Air Quality - Mitigation of Emissions associated with new development

The inclusion of a solar PV installation at roof level is supported for the same reasons as given in the consultation response under APP/19/00253. Comments regarding heating & cooling equipment given under that application are equally relevant to these proposals.

Ground Investigation (Contaminated Land)

The main investigation report follows a preliminary assessment (also dated December 2019), not reviewed by Environmental Health. Comments here relate only to the 17974/MIR_R27 report.

The report documents a significant thickness of made soils at the site, as expected, to an inferred maximum depth of 5.2m below ground level. Made soil overlies low-permeability, cohesive (clayey) Head deposits, and stiff London Clay at depth.

Logs indicate black staining, bitumen & tar gravel, frequent ash & clinker, metalliferous slag, construction & demolition wastes ceramic wastes from other sources. Asbestos screen returned negative results for all samples, but its presence should be anticipated given the character of described soils and the likely date of their deposit. (1934-1953)

I would agree the conclusions from soil-gas monitoring, there are no 'red flags' in the monitoring results, and the soil description does not suggest that methanogenic / putrescible material is particularly common within the body of made soil. The elevated CO₂ (<3% v/v) is likely due to decomposition of low levels of organic material, or biological degradation of petroleum hydrocarbons. No mitigation of soil gas risk is considered to be necessary.

I view the soils results less favourably. The report indicates that results have been compared to a Commercial landuse scenario generic assessment criteria (GAC). Setting aside for the moment whether this is the most appropriate screening value, the max recorded concentration of B(a)P exceeds the commercial GAC, and the maximum recorded concentration of D(a,h)A is >90% it's respective commercial GAC. Several domestic GAC are exceeded, alongside a number of the public open space GAC.

There is no particular reason to expect that the maximum concentrations recorded as part of this investigation are likely to correspond to the maximum concentrations present at the site.

This is relevant both to the provision of potable water supply to the proposed building (where barrier pipe is likely to be required), and also with respect to off-site contamination sensitive receptors.

With reference to the levels differential indicated in the FRA, the inferred base of Made Soils is broadly coincident with the base of the topographic slope. Made soils are contamination-impacted, and overlie head deposits that are likely to act sufficiently as an aquitard to facilitate down-topographic-slope migration of contaminants, with deposition / accumulation in soils at the base of the slope. The down-slope landuse would appear to be residential, where commercial GAC would be inappropriate. This is arguably the most significant potential pollutant linkage, and the submitted report has not addressed this risk either through consideration of leaching of contaminants from made soils, or through chemical analysis of groundwater samples.

The proposed development could in principle prejudice the remediation of the site, should this be deemed necessary, and so I would recommend that the risk to contamination-sensitive off-site receptors is considered. The most expedient way to consider this risk would be to quantify the concentration of contaminants in groundwater - this would represent liberation rates under real-world / on-site conditions, and give a good steer on the likely degree of mobility of the contaminants identified. It is understood that wells remain available on site, so no additional intrusive work should be necessary in the first instance. Further fieldwork would only be necessary upon return of concerning results from groundwater monitoring

It is understood that the application is to be withdrawn, and comments were sought to inform a re-submission. I have not therefore provided any specific recommendation in respect of determining this application - it is assumed that no determination is to be made.

Mr. Jonathan Driver
Environmental Control Officer