

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/19/00716	Your Ref:	APP/19/00324
EH Case Officer Extn:	44 6666	Date:	02 May 2019
DC Case Officer:	Steve Weaver		
DC Case Officer Extn:	44 6512		
Application Number:	APP/19/00324		
Site Address:	5-7 Station Road, Hayling Island		
Proposed Development:	Demolition of existing dwelling and business units and construction of a 2/3 storey building to provide 19 flats and 2 commercial units with vehicle and bicycle parking and a bin store.		

Observations / Comments:

I have reviewed the application documents, and would like to make some comments regarding contamination, drainage, and transport /sustainability (air quality). These subjects have largely been covered previously under GEN/18/00623 (EH Comments dated 12/07/2018). These comments try to avoid substantial duplication.

Parking Quantum (Air Quality)

I note that drawing no 1200 revJ appears to omit parking space no. 10, overstating the no. parking spaces by 1. This would increase the parking shortfall from 8 to 9, or by more than 10%.

Having reviewed a selection of public comments, I note that a significant proportion cite parking issues as a reason for objection. The applicant acknowledges a shortfall for both commercial and residential uses, but has demonstrated that the adjacent car park had more than 50% capacity at all surveyed times / dates. The applicant also points out that the facility attracts no parking fee or usage restrictions (e.g. overnight parking).

I would agree that the Council-owned car park is suitable for serving the commercial need - that is presumably the reason for the Council to provide the facility. I am less clear on the reasonableness of residential development relying upon a public car park to satisfy its parking quantum, being aware that Hayling Island residents tend to be more reliant upon the private motor vehicle than is the case on the mainland. I regard this as a planning question, for others to determine the acceptability (or otherwise).

This said, the site is very well located for local services, facilities, and access to public transport (the bus network). Links to Havant Bus & Rail Stations are reasonably frequent, and given the area-commuter bias to the city of Portsmouth, the Ferry does provide a viable mode of travel for commuters, via cycle transfer. The cycle parking is adequate, and conveniently located within the scheme, and from an air quality perspective, the reduced parking quantum could be regarded as a means of discouraging resident car ownership (by extension,

encouraging residents to adopt sustainable and active travel modes).

The local perception that the parking is already 'bad' would appear incompatible with the results of the car park survey, and with the available aerial photography (it is accepted that this is a literal 'snapshot'). The 'no waiting at any time' restrictions on Station Road would suggest that overspill parking should not be a problem, and there doesn't appear to be any anecdotal evidence of significant overspill parking in side-roads - local businesses and facilities appear to have adequate parking.

Notwithstanding the relative inaccessibility of the island in comparison to mainland locations; the site location does have some inherently sustainable characteristics, and I feel that a <SPD parking provision may be supported at this location.

Transport Assessment (Air Quality)

The assessment concludes net gain in AADT trip rate of <50 as a direct result of the development. The parking shortfall noted is addressed above.

I note that comments from local residents indicate a perception of roads operating at capacity - the available traffic flow figures would suggest that this is not the case, with the A3023 north of Langstone Bridge experiencing no absolute AADT traffic growth over the past 17 years, and growth north of Church Lane amounting to around +18% over the same period. The Church lane junction has recently been assessed to be operating with an RFC <0.85 (Adequate), with a base flow of around 27,000 AADT.

The development contribution to these flows (<+0.2%), and the flows on Station Road (~+1%) is unlikely to materially affect any specific road junction when considered in isolation, or indeed as a contribution to the aggregate change unless the 2036 Local Plan represents a material intensification of development rates when compared to those experienced in recent history (since 2000).

On this basis, I cannot object to the development on Air Quality grounds, especially as the development seeks to enhance the retail / service offering of the local centre by replacing general industrial use classes with 'town centre uses' which could be argued to encourage local shopping (and so avoid trips further afield).

Air Quality (General)

As previously noted, ambient air quality in the area is good, and there are no concerns.

Contamination

The submitted report is a phase 1 environmental desk study, authored prior to the Council making a substantive response to an EIR request by the authors. In this sense, it is relatively incomplete, and does not provide any information which is new to the Council. It's conclusions are agreed, and it is considered that the proposed site investigation should be secured by means of a pre-commencement condition.

Suggested wording is produced below, alongside a brief informative for the benefit of the applicant, highlighting the signposting the information held by the Council (in case a revised EDS was not issued by the authors to their client, and that the client approaches a different consultant to undertake the follow-up inspection work.

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 (other than demolition, site clearance, or any 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 GCC Ground Condition Desk Top Study Ref: J19-005-R01; 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, including those off site..*
- 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 in the Remediation Strategy (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: *Having due regard to policies DM10 of the Havant Borough Adopted Core Strategy [2011] and DM17 of the Havant Borough Local Plan (Allocations) [2014], Contamination may be present at the site as a result of previous land uses (&/or activities) on site and in the vicinity, that could pose a risk to future occupiers of the site, or contamination-sensitive receptors in the immediate vicinity.*

Verification (Standard) [2]

*Prior to the occupation of any relevant part of the permitted development, any verification report required in accordance with **condition [1]** 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 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], Contamination may be present at the site as a result of previous land uses (&/or activities) on site and in the vicinity, that could pose a risk to future occupiers of the site, or contamination-sensitive receptors in the immediate vicinity*

Informative (for condition [1])

The Council holds information in the historic planning archive relevant to the former potentially contaminating uses of the site. Relevant extracts were provided to the authors of the Ground Condition Desk Top Study under EIR reference 190125001. It is expected that the design of the Phase 2 Intrusive investigation works at the site will be based upon this information, as well as that presented within the GCC J19-005-R01; report. If a different consultant is selected for this onward work, the applicant should contact the Council to request a copy of the information held.

Drainage / SuDS (Contamination)

The draft drainage strategy appears to comprise a permeable system with overflow outlet to public sewer. It is unclear whether the permeable solution serves simply the storage (volume attenuation) requirement, or is intended to serve an infiltration function.

It is anticipated that the site will prove to be underlain by a mantle of made ground, variable river terrace deposits & Bognor Sand. Groundwater is expected to be relatively shallow. The site is currently almost entirely metalled, and as such contaminants within the vadose zone (above the water table range) are not subject to mobilisation / vertical migration pressure caused by percolation. Use of infiltration drainage may change this status, and could mobilise contaminants to groundwater, where they may migrate laterally.

The association of the site with automotive refinishing uses & classic vehicle services represent risk factors for VOC's which may affect neighbours by vapour pathways (e.g. from moderate depth).

For these reasons, until the contamination assessment is completed (until a robust site conceptual model is available, based upon site-won empirical data) I am cautious about the surface water drainage system including infiltration elements. I have not spotted any runoff calculations for the LLFA, and it may be that detailed design needs to be secured by condition in any event.

In the absence of comments from other consultees as regards drainage provision, I would recommend that the detail be secured by the following (bespoke) condition;

Restriction on Infiltration Drainage – Contamination [3]

Prior to the commencement of development, details of the proposed means of surface water disposal shall be submitted to, and approved in writing by, the Local Planning Authority. There should be a presumption against disposal by means of infiltration drainage unless compatible with the contamination assessment 'site conceptual model' & remedial / risk mitigation scheme.

Reason: *Desk based research indicates that a degree of contamination is likely to be present at the site as a result of both previous & current land uses (&/or activities). Use of infiltration drainage may alter the direction & rate of migration, and could increase exposure risk to the occupants of neighbouring property. Having due regard to policies DM10 of the Havant Borough Adopted Core Strategy [2011] and DM17 of the Havant Borough Local Plan (Allocations) [2014] this condition aims to ensure that the adopted drainage strategy is compatible with the treatment of contamination risks at the site, and that risks to all off-site receptors are minimised"*

Mr. Jonathan Driver
Environmental Control Officer