

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

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

Our Ref: CONS/19/01579 **Your Ref:** APP/19/01579

EH Case Officer Extn: 44 6677 **Date:** 29 August 2019

DC Case Officer: Daphney Haywood

DC Case Officer Extn: 44 6513

Application Number: APP/19/01579

Site Address: Land adjacent Woodcroft Primary school, Woodcroft Lane,
Waterlooville, PO8 9QD

Proposed Development: Reserved matters application following Outline Planning
Permission APP/15/01235 relating to appearance, landscaping,
layout and scale for residential development for 43 residential
dwellings with access off Woodcroft Lane and emergency access off
Eagle Avenue.

**Any views you should wish to make should be returned to me
no later than 30/08/2019.**

Observations / Comments:

I have reviewed the application and it's supporting documentation, and would like to provide some brief comments, principally on ground contamination, but also as regards drainage and air quality.

Ground Contamination

The site had a 'greenfield' history prior to the development of the primary and junior schools at some time between 1970 & 1973. The site was subject to a physical investigation prior to the demolition of the Junior School under consent no. 09/59532/002, with that investigation limited to open areas of the site. No visual / olfactory evidence of contamination was identified, and as such, no soil samples were scheduled for chemical analysis.

Havant Borough Council accepted that report for the purposes of the 09/59532/002 consent, and 'signed off' the site from a contamination perspective.

Since the acceptance of that report, the school buildings were demolished, and a sports pitch created on the footprint of the former buildings. I have been unable to identify any archive planning documents relating to the development of the school buildings specifically - it appears that the outline consent was granted under 16442/10(A) in 1970, and the next consent 16442/11 (also 1970) relates to the development of an outdoor pool, apparently for an extant facility. It is possible that the school plans were approved as a County Matters Consent, concurrently with the Borough Authority Outline Consent.

The absence of plans in the archive precludes confirmation of the degree to which asbestos containing materials (ACM) was used within the fabric of the building, and whether any local fuel stores were present to serve heating appliances (or furnaces / incineration units present, etc.).

No asbestos surveys / removal verification reports are present within the 2009 file. The build date means that ACM is likely to have been present, and it should be noted that the demolition (and the consequent made ground risk) post-dates the available site investigation.

I note that Plan Ref: P6724-P102 included the text: *"Area to be cleared of building materials down to natural sub-base prior to being backfilled with topsoil, regraded and drained to create sports pits 3750m²".* In principal (therefore) there should be no made ground present at the site, and if there is, the liable party would be the contractor responsible for implementing the demolition in accordance with the proposals. As an unverified element of the consent, there does however remain a risk that asbestos containing demolition wastes may be present within- and in the vicinity of- the footprint of the former school buildings. It is not anticipated that any made soils present would be of significant depth, but I would stress that local disposal of demolition waste within school grounds is very common, and asbestos contamination has been identified at several school grounds within the Borough to date.

I acknowledge that Portsmouth Water company has proposed two no. conditions, one relating to unexpected contamination, the other to piling risk (if proposed). The former includes risks to future occupants, and so is adequate for the purposes of Environmental Health, and so no amendments are necessary. *Both conditions proposed by Portsmouth Water Company are supported*, as I would agree with the conclusions of the Crossfield Consulting report that the chalk is likely to be present within a typical piling depth, and as the site is designated a groundwater source protection zone (1, inner).

For the avoidance of doubt, *I would recommend the following informative* to be placed upon any consent granted in respect of this application:

Informative 1 (Asbestos in soils)

"It is the responsibility of the developer to ensure that upon completion, the development is safe & suitable for its intended future use. The construction date for the buildings formerly occupying this plot suggests that Asbestos Containing Materials (ACM) are likely to have been used in the original construction. These materials would have been disturbed during the demolition of those buildings, and may remain on site as buried demolition wastes within topsoil / made ground, or under hard-standings or within areas landscaped since 2008. Buried demolition waste may be identified during the installation of new foundations or below ground services, or when undertaking landscaping tasks. In the event that any deposits / inclusions comprising fibrous or any other obvious construction-related waste materials be encountered during works, construction should cease in that area of the site until an appropriate assessment of the nature and extent of possible ACM has been undertaken, and appropriate actions taken to mitigate any identified risk. Your Building Control provider should be notified of any discoveries of buried suspected ACM to ensure that you remain compliant with the provisions of controlled Document C. Environmental Health should be notified of any ACM identified within soils, and provided with details of how the material has been dealt with"

Transport / Access / Parking (Air Quality)

I note that local objections principally focus on parking & amenity, and the emergency vehicle access to be provided to Eagle Avenue.

I have not found a rationale or justification for the provision of the emergency access - it would appear that it accommodates a level change, and is both narrower, and includes tighter-radius bends than does the principle access road taken from Woodcroft Lane. It occurs to me that in proposing an alternative access for emergency vehicles, the applicant is acknowledging a significant congestion / parking issue on Woodcroft Lane.

From an air quality perspective, the emergency access is considered to improve access to the school by means of sustainable transport modes, and so it's inclusion for this purpose is

supported. There may be a reciprocal detriment to the amenity of plot no. 8, but my colleagues will be covering amenity / noise / nuisance issues under separate cover, and I anticipate that this will be picked up in those comments.

Taking the implicit acknowledgement of a congestion issue on Woodcroft Lane, together with the representations of local residents, it occurs to me that the development itself is at risk of providing additional space for overspill parking for school-run pick-up/drop-off, and that the local roads may (therefore) require a bond to facilitate a traffic management order in the event that this problem arises. This goes beyond the remit of Environmental Health, and I would therefore recommend that the views of the Traffic team be sought in respect of parking controls within the development red-line area. I note that the Traffic consultee has flagged that the development is likely not compliant with the latest parking SPD, despite the assurances of the design & access statement. I could not find an explicit comparison between requirements and proposals, so overall provision is unclear - however it would seem that the development falls short of the recommended 20% visitor allocation. I would not support a <SPD provision at this site, as I don't believe it's accessibility credentials to be sufficiently high as to justify it.

I have considered the area in terms of significant local air quality issues (insofar as the National Air Quality Objectives, and the local issues anecdotally described), and have not identified any locations at risk of non-compliant exposure. This does not however mean that there is no public health impact from increasing local emissions (there is no limit for particulate emissions considered to be 'harmless', for example), or indeed from the anxiety caused by the perception that idling vehicles are causing unnecessary local emissions & harming health.

Given the content of the local objections lodged, and the available Council powers - I would anticipate that the Council will receive enforcement requests for the existing (and any new) traffic management orders, and potentially also for the idling vehicles which are often associated with school-run parking problems. It is not clear that this issue has been given robust consideration, or whether there may be an appropriate design response to mitigate the risk of problems arising / being exacerbated.

In respect of encouraging travel by sustainable modes (as stated above), the additional access to Eagle Avenue is supported. I also note the design & access commitment to SPD compliant cycle storage. My only comment in this latter regard is that there are properties shown on the site layout which do not obviously benefit from direct access to the rear garden area. In order for cycle storage to encourage cycling as a convenient and reliable mode of transport, the storage must be quick and convenient to access, and should be accessible without the need to pass through the internal living accommodation (including access hallways etc.).

Drainage

No flood risk or drainage plan is included with the application documents. It would be prudent to secure an agreed layout as a pre-commencement condition. Residential development represents a relatively low pollution risk, however the local groundwater environment is extremely sensitive.

For this reason, and for the avoidance of doubt - pumped foul sewage system should be avoided wherever practicable, and surfacewater disposal via a soakaway structure which discharges directly to the chalk should not be permitted without robust pre-treatment (via SuDS features, or proprietary interceptors).

I would anticipate the LLFA requiring on site volume attenuation and a strict discharge rate to limit runoff to greenfield rates, and that the LLFA will seek to secure an acceptable drainage layout by means of a planning condition.

Mr. Jonathan Driver
Environmental Control Officer