

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/18/02560	Your Ref:	APP/18/01109
EH Case Officer Extn:	44 6677	Date:	08 January 2019
DC Case Officer:	Lewis Oliver		
DC Case Officer Extn:	44 6263		
Application Number:	APP/18/01109		
Site Address:	Dairy Crest Depot, Dunsbury Way, Havant		
Proposed Development:	Outline application for the redevelopment of Former Dairy Crest site for up to 78 dwellings with access off Fulflood Road.		

Observations / Comments:

I have reviewed the supporting documents to this application, inclusive of the Flood Risk Assessment (SUDS & pollution risk), Transport Assessment & Framework Travel Plan (Air Quality) and Environmental Desk Study (Contamination).

Flood Risk Assessment

It is acknowledged that the site is around 3.0m above the water level of the Riders Lane Stream, and around 1.0m above the Environment Agency's calculated 1 in 1000 year flood level (not accounting for climate change). In the absence of any specific reason to conclude otherwise, I'd be inclined to agree the qualitative statement at 3.2.5 that climate change is unlikely to place the site at significant risk of flooding in the sense that it is material to planning decisions being undertaken in 2019. Given the relatively level profile of Dunsbury Way, it is unclear to me how climate change is likely to result in a +1.4m increase in extreme flood levels which remains broadly constrained to the line of the river channel (as indicated by the PUSH model)/

Given the elevation of the site, it would appear that there will be sufficient hydraulic head to permit drainage to the Riders Lane Stream even under 1 in 100 yr flood conditions, so surface water disposal at the Stream would appear to be feasible.

It should be noted that the water quality in the stream has been recently assessed, and concentrations of several determinands were found to be in excess of their respective Quality Standards (EQS) - including Nitrite, and several heavy metals. This is relevant to the pollution interception strategy associated with the SuDS scheme (surface water drainage) and the contamination assessment. Under a scenario where the controlled water is already experiencing a relatively high pollutant loading, it will be especially important to ensure that the site contributes as little additional pollution as is reasonably practicable, and similarly, that the site contributes to the maintenance of flow levels in a consistent manner, without exacerbating any tendency toward 'flashy' flow character.

I note that the drainage strategy proposes a proprietary interceptor unit downstream of the flow control and cellular storage. It is assumed that entry to the system will be via conventional trapped gulleys. Configuring the system this way will place the cellular storage upstream of the separator unit - cellular storage is essentially composed of 'mesh' crates (non-open storage), and therefore placement upstream of the flow control and interceptor unit risks problems with siltation of suspended solids, and ingress / retention of- (clogging with-) fibrous organic material (leaves etc.). Maintenance of such structures is difficult, so very effective traps will be necessary to maintain operation and storage capacity in the medium to long term. Conversely, placement of the interceptor unit upstream of storage will minimise this risk. Given the inherent risk level of the development it may be possible to omit the proprietary interceptor altogether; for example, it a though substitution with a well constructed permeable parking surface that will exclude leaves and solids. This should represent a lower-maintenance solution that will be similarly protective as regards the downstream release of pollutants.

Traffic & Transport, Travel and Air Quality

It is noted that the proposals represent a traffic demand equivalent to an approximate maximum (daily, AADT) flow increase of around 4.5% on Dunsbury Wy. Survey data shows that this road carries just short of 6,000 vehicles (as AADT). This is below the screening threshold for a specific air quality assessment (considering the development as a source of new air pollution).

Considering the development as a receptor for existing pollution sources, it is worth noting that recent air quality monitoring proved local ambient NO₂ levels (at an approximately equivalent distance to the kerbside as the proposed residential facade) to be around 60% of the national objective values. This level is some +50% compared to estimated background levels, thought likely to be due to the relatively high volume of public service vehicles routing via Dunsbury Way and Bramdean Drive.

I note that the Transport Assessment does not identify any junction capacity issues, with RFC remaining some 0.25 (~31%) below typical thresholds where flow impacts are likely to be evident. As there are not likely to be any disproportionate flow impacts on the local roads, there are similarly unlikely to be any correspondingly disproportionate air quality impacts.

I would tend to agree the assessment that the site represents a sustainable location which provides good access to public transport, and which would facilitate active travel choices. I have not identified any particular deficiencies in the local pedestrian / cycle network for which improvements might justifiably be sought in connection with this development.

I note the marginal below-SPD parking provision, and given the location of the site relative to local bus services, retail opportunities, and local services - I would be able to support (as a positive air quality measure) a more ambitious (i.e. smaller / lower) quantum of parking, provided that spaces were unallocated and that some consideration is given to the exclusion of non-residents (e.g. taking advantage of unrestricted & free parking close to retail destinations).

A residential travel plan is required for developments over 50 units to serve a number of policy goals, including public health (active travel & air quality) and climate change (limiting unnecessary travel via conventionally fuelled vehicles). At this outline stage, the submitted document is necessarily fairly generic. Nevertheless, I have some brief comments which I would like to make in the interests of ensuring that the potential benefits of the plan stand the best chance of being achieved.

- The Travel Plan includes measures which seek to target single occupancy vehicle trips - for example car-sharing (at 7.7). I note that there is no corresponding mode-shift target (Table 4). There is a risk that this option will not be effectively pursued if there is no corresponding target, and I note that the implementation does not seek to leverage national schemes (e.g. liftshare.com, which already has over 3000 registered Hampshire Journeys on their database). It would seem a far more viable strategy to promote existing resources than to consider setting up a local database - not least as the former needed be demand dependent.
- Marketing & promotional activity (at 7.3) mentions local car clubs.- it is not clear that the authors have identified any car clubs available within a reasonable distance of the development, and I would again highlight that there is no distinction in the targets between 'single occupancy car trips by conventionally fuelled privately owned vehicle', and 'single occupancy car trips via LEV/ULEV/EV or other sustainable vehicle access scheme (e.g. a car club)'.
- In line with the above point, whilst the policy statement refers to NPPF provisions and emerging local plan policies in this respect, there is no provision for supporting (plug-in) LEV/ULEV/EV use, and no distinction between less-, and more- sustainable PCU trips. I would encourage this be picked up in the detailed design - it may be worthwhile to 'lose' a small number of unallocated parking spaces to a managed (public facing / commercial) charging bay service provider in order to promote use, improve the sustainability offering of the scheme, and to help comply with emerging policy. There would appear to be conceptual capacity relative to the SPD quantum of parking, which could be justified by the sustainable location and the positive contribution that public bays could make to the locality.
- I welcome the provision at 7.3.2, which will ensure that sales staff are well informed to put travel at the heart of a customer's decision to purchase or lease a property as a 'first occupant'. I note that this form of selection - which if successfully pursued would lead to an initial occupancy cohort pre-disposed to travel to local destinations and by sustainable means - could lead to a baseline travel scenario which is somewhat better than the 2011 census benchmark, consequently making mode shift targets a little more challenging to achieve. The measure is nonetheless supported as a positive measure.
- I welcome the provision at 7.8.3, which will assist in matching residents with local employment opportunities which are more likely to be reachable by sustainable modes of travel.

I would also highlight that emerging policy includes policy relating to air quality which seeks design features which contribute positively to resisting emissions inflation which is driven by new residential development, and the transport demand of all new development. Given the outline status of this application (and that a number of design features will be reserved at this stage) the applicant should be aware that the policy may have material weight when details proposals are brought forward. Ideally, the applicant should consider such features as a matter of good practice, contributing towards the sustainability credentials of the development relative to the NPPF presumption in favour, and to compliance with existing local 'high quality design' and 'climate change' policy (CS16 & CS14 respectively).

Contamination Assessment

The conclusions of the submitted environmental desk study in essence recommend an intrusive site investigation be undertaken. This fundamental conclusion is agreed.

The report specifically references information obtained from Environmental Health, and

accounts for those comments within the preliminary site conceptual model. It is worth noting however that the Councils conceptual understanding of (in particular) the local hydrogeology & hydrology has developed since that response was made - most notably in connection with the recent assessment of a nearby site on Fulflood Road.

The Council will draw upon its knowledge of the site when considering the results of future site investigations. This will in particular be relevant to the consideration of the local surface water (reported in the Ridge EDS as 'unnamed', but representing the Riders Lane Stream, which has status as a statutory main river and which ultimately discharges to an Ecological asset which benefits from multiple European designations).

The submitted desk study assigns a risk level of 'very low' to this feature. I would disagree with this risk assessment on the basis of the above, and the recent water quality sampling which identifies elevated concentrations of pollutants within this feature upstream of the subject site. The proximity to- and elevation of the site relative to- the stream (alongside its baseline quality and destination) would lead me to regard it as a principle risk driver which the design of the contamination investigation should account for. It has also been shown to be likely that the local superficial (Secondary A) aquifer is in hydraulic continuity with the stream, and to impacts to its quality should also be considered to be potentially material as a contaminant vector to the freshwater ecology represented by the surface waters.

In line with the applicant's own assessment, I agree that contamination is unlikely to adversely influence a decision on the principle of development, subject to application of suitable conditions to secure its assessment, and if necessary, remediation. Suggested wording below:

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 Ridge & Partners Report Ref: 5003415v2.0 (Oct 2018); 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 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 to the quality of controlled waters in the vicinity of the site.

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 to the quality of controlled waters in the vicinity of the site.

Mr. Jonathan Driver
Environmental Control Officer