

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/19/00834	Your Ref:	APP/19/00427
EH Case Officer Extn:	44 6677	Date:	31 May 2019
DC Case Officer:	Daphney Haywood		
DC Case Officer Extn:	44 6513		
Application Number:	APP/19/00427		
Site Address:	Land south of, Lower Road, Havant		
Proposed Development:	Development of 50 new dwellings together with access, landscaping and open space.		

Observations / Comments:

I have reviewed the application details, and note that this formal application follows a request for pre-application advice that Environmental Health responded to under internal reference CONS/17/02446.

I will provide some brief comments below on General Pollution (SuDS/CEMP), Air Quality & Contamination.

Contamination

The Environmental Desk study was in broad accordance with the Councils opinion of the risk profile of the site, and did not identify any potential sources which could affect the site and which were previously unknown to the Council.

The intrusive investigation provided general coverage of the site, and sought to target the raised (made) ground comprising the historic track, and groundwater in the vicinity of the former above-ground storage tank (for which no record exists to inform a desk-based assessment of the risk posed by this feature).

Groundwater was not encountered during drilling, and subsequent monitoring has shown levels to be generally deeper than 3.0m below existing ground levels. Portsmouth Water has also confirmed that groundwater south of the SPZ1 is down-hydraulic-gradient of the potable abstraction points, and is (therefore) of relatively low sensitivity. No groundwater sampling was undertaken, but given the depth of the perched water, the low sensitivity to contaminants, and the lack of visual or olfactory evidence of contamination impact - I would agree that sampling was unnecessary.

Contamination was identified within two samples of made ground from the same location (WS4). In the absence of other samples, these results must be assumed to be representative of the whole volume of made soils associated with the raised access track.

The deposit of Made Ground is well defined & identifiable at the surface, and deeper samples from WS4 confirm that natural soils are unaffected (contaminants are of low

mobility). Screening criteria were exceeded for several PAH congeners at depths of at least 0.4m depth (and may be found anywhere within the made soils, proven to upto 0.9m depth), and the report concludes that this is sufficient to consider the made soils unsuitable for garden areas *en masse*.

In the absence of sufficient samples to allow a statistical assessment, I would have to agree the conclusion of the report in this respect, and by extension, accept the recommendation that the material should be removed for use in less sensitive areas of the site. I do agree that use within a new access track or under metallised road surfaces is acceptable, given the contaminant mobility and the different exposure profiles.

The report also proposes a watching brief be maintained - given that the applicant chose not to commission a UXO risk assessment, it would be sensible to secure the watching brief by means of a condition, in order to raise awareness of the potential presence for deleterious materials to be present.

[Condition 1] Implementation of Remedial Measures, and Verification Reporting (Bespoke)

The development hereby permitted shall be carried out in accordance with the recommended Remedial Works and Contamination Discovery Strategy outlined in sections 11.2 & 13.0 of the Geo-Environmental Services Ltd. Ground Appraisal Report (Ref GE16507-GAR-NOV17 v1.0 08/11/2017), unless otherwise agreed in writing by the Local Planning Authority.

Prior to the occupation of any relevant part of the permitted development, a verification report shall be submitted to and approved in writing by the Local Planning Authority. The verification report must;

- a) demonstrate the adequate segregation of made soils deemed inappropriate for use in private garden areas, and either the appropriate 'off-site disposal' or 'within-development placement' of this material to ensure that no unacceptable exposures arise, and;*
- b) document any assessments &/or remedial actions required to be taken in accordance with the Contamination Discovery Strategy, or if no actions were required; provide a positive declaration that no relevant discoveries of previously undocumented 'suspected contaminated' soils were made.*

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 impacted soils have been identified within a discrete deposit at the site where contaminants are likely to exceed levels considered appropriate for use private gardens, allotments or soft-landscaped public amenity land. This condition aims to secure an appropriate use or destination for these soils, to ensure that no unacceptable exposure to harmful contaminants may occur.*

Air Quality

Air quality has been considered in terms of both the effect of existing air quality upon the future occupants (as introduced sensitive receptors), and the emissions associated with the occupation of the proposed dwellings.

- Exposures within development

Background levels of air pollution are high around the A27 & A3(M) carriageways and road junctions, for Nitrogen Dioxide representing close to the highest values in the Borough. The application site is however sufficiently distant that background levels would be expected to be around 13% lower within the site boundary. Some modelling & monitoring information is available from the Forty Acre Farm application, and from monitoring undertaken by Havant Borough Council in the region of Bedhampton Hill.

The balance of that information shows that models predict exceedances around J5 of the A3(M) & down-prevailing-wind of the A27 carriageway, but that measured results indicate substantially better air quality than predicted. This is tentatively attributed to the levels of planting around the carriageways, and in the wider landscape. It is considered reasonable to conclude that ambient air quality within the application boundary is unlikely to exceed 75% of respective objective or limit values (i.e. acceptable with >25% 'headroom' relative to applicable standards).

- Mitigating development emissions

As a source (upon completion & occupation), the development will introduce 50 new dwellings to the area, and contribute the products of combustion from dwellings (space heating, water heating, and cooking); alongside the indirect emissions associated with energy use and the emissions associated with the transport demand of the occupants.

Emerging policy requires that developments consider and seek to mitigate these impacts. Whilst this policy does not yet carry material weight, it is recognised that these proposals seek to retain a substantial amount of the existing vegetation, and to introduce a reasonable level of green space and amenity planting, alongside a mix of hard & green boundaries.

In this respect, it is noted that the Landscape & Civil Engineering team require the variety of native planting to be increased, and for the landscaping scheme to place greater emphasis on large legacy trees. It is also noted that the character assessment requires a great reliance upon boundary planting and existing screening for successful integration with conservation area. It would appear that both landscape & ecology requirement are likely to ensure sufficient site green infrastructure to satisfy a proportionate general contribution to mitigation of development air quality impacts (by providing pollution interception, absorption and 'sink' services via the proposed and retained green infrastructure).

This notwithstanding, I would recommend that the applicant seek to select native tree (and hedging) species are selected which have a medium or high score on the Urban Tree Air Quality Score (UTAQS), where this remains compatible with the landscape & ecology requirements.

Suitable species include Alder, Maple, Hawthorn and Birch species (high UTAQS), and Apple, Ash, Cherry, Lime, Elder, Alder, Hazel, Rowan and Sycamore (medium UTAQS). Medium score species are generally better suited to absorption of NO₂ & SO₂ pollutants, whereas high score species are pollution tolerant, and generally more efficient at filtering particulate pollutants. Species that reach large mature size (height & spread) are substantially more effective than more diminutive species, though a 3 dimensional green environment which ensures air / leaf interactions at a variety of heights is beneficial.

For the benefit of the applicant, further detail on UTAQS can be found at the following link: <http://www.es.lancs.ac.uk/people/cnh/docs/UrbanTrees.htm>, or on the ecosystem services provided by particular tree species, at www.itreetools.org.

I have also briefly reviewed the Transport assessment and comments from both the Highway Authority and the Civil Engineers. These consultees have adequately covered both the junction modelling exercise and the aspects of the proposed development which will serve to facilitate the uptake of active travel modes for local trips. I have nothing further to add at this stage.

Environmental Health would wish to be consulted on any travel plan required by a subsequent s106 agreement, and to be kept informed progress towards targets as a routine part of plan monitoring.

General Pollution (SuDS)

I have reviewed the scheme, and note both the DCF summary comments from the Environment Agency, and the comments of Portsmouth Water Company regarding groundwater sensitivity.

The SuDS design is considered to represent an example of best practice as regards pollution control, and the scheme can be supported as proposed.

General Pollution (CEMP)

I note that both the County Ecologist and Environmental Health colleague have recommended specific conditions relating to the securing of a suitable Construction Environmental Management Plan.

In light of the relative lack of additional pollution sensitivities associated with the site, there is nothing further to add to the comments already made in respect of controlling emissions from the construction phase.

Mr. Jonathan Driver
Environmental Control Officer