

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/19/00295	Your Ref:	GEN/19/00137
EH Case Officer Extn:	44 6677	Date:	06 March 2019
DC Case Officer:	Daphney Haywood		
DC Case Officer Extn:	44 6513		
Application Number:	GEN/19/00137		
Site Address:	Electricity Board Centre, Bartons Road, Havant, PO9 5JB		
Proposed Development:	Proposed three storey public house/ hotel with a restaurant and associated parking, Residential Care Home and 42No. Flats and 9 No. Houses.		

Observations / Comments:

I have reviewed the draft scheme, and would like to provide comment with respect to both air quality, and contamination.

Contaminated Land

The site is immediately adjacent to a potential source, represented by the Havant Motorwork Garage (a former petrol filling station, currently operated as a car sales and Service & Repair garage). Houses with private garden areas are proposed adjacent to this source (Southwest of the site), co-locating the highest sensitivity proposed landuse with the area of the site where the greatest risk exists of contamination being present (at least as a result of off-site sources).

The Geology underlying the site is Bognor Sand. There is an absence of drift geology at this location, and the closest available borehole record (on site), reports just 6" topsoil over Bognor sand unit proven to 30ft. (~9.5m). Underlying this is a sandy clay (Bognor Sand Member, London Clay). The sandy horizons are porous, and classified as a secondary 'A' class aquifer. Groundwater may be present within this unit, and could be seasonally quite variable. It is likely to be capable of acting as a transport vector for contamination, whether originating off-site or from within the site curtilage.

In terms of on-site risks, it appears that the SSE premises were built on greenfield land, and as a result, I would not expect any significant Made Ground risks (e.g. from the presence of construction & demolition wastes, including asbestos). I note that the original building was extended (a new block constructed) mid-late 90's, but it does not appear that any substantial demolition occurred. The risk from existing buildings depends upon their prior use. I do not have any specific information which would suggest that any particular areas are likely to represent a significant potential risk, but as a large commercial building localised risks cannot be ruled out. Desk based information may be informative in this regard - for example, if confirming that the site comprised office accommodation only, with no on site fuel storage for UPS's / Generators, or boiler room - then the risk may be framed as being very low, or if such features

are confirmed present, an intrusive investigation will be sufficiently informed to allow useful 'worst case' data to be collected reasonably efficiently.

I would conclude that an environmental desk study, and phase 2 site investigation would be required to support development of this site in accordance with both local & national policy provisions - even if no on-site risks are identified through the desk-based phase, the soil quality will need to be confirmed close to the adjacent source.

If not provided with the detailed application, a full suite of contamination conditions will be sought. I do not anticipate that meeting the contamination policies would prejudice the delivery of development, given the relatively localised nature of the potential sources and the quantum of development proposed. In this way, I do not view contamination as a challenge to the principle of development.

Air Quality

The nearest and most recent traffic flow estimates place expected daily traffic flows on Petersfield Road at between 17,000 & 20,000 vehicles, and between 8,000 & 11,500 vehicles on Bartons Road (AADT). I.e. both roads would be classified as 'busy', and the Bartons Road / Petersfield Road junction would be considered a busy junction (>25,000 AADT).

The care facility would be classed as a sensitive receptor for air quality purposes, and I note that the outline site development masterplan places the facade of the residential care home within 10m of the kerbside of the busy junction. Prevailing wind direction would also represent a further risk factor for a 2 or 3 storey building in this position / orientation (pollutants tend to accumulate on the windward side of solid barriers for wind directions between 45 & 90 degrees to the facade, and it is known that (due to local prevailing winds) concentrations can be +25% on the East side of North / South oriented busy roads (compared with West side), even where North / South traffic flows are balanced.

There has not previously been a need to monitor air quality (nitrogen dioxide) in this area, so I do not have any representative data. The closest representative monitoring was undertaken at New Road, where traffic flows were around 17,000 during the monitoring period. Kerbside exceedance of air quality standards was identified at that location. Nitrogen dioxide is a pollutant that disproportionately impacts the elderly and those with pre-existing respiratory, pulmonary or cardiac conditions. Without exposure mitigation, placement of the building facade at this distance could place occupants of rooms adjacent at elevated risk of harm. It would be recommended that either the air pollution levels are quantified (by measurement), that the building be positioned such that it maintains a buffer distance of 25m from the kerbside of the busy junction & >10m from the kerbside of busy roads, or that the rooms within these distances are protected by a mechanical or passive ventilation system which draws it's air exclusively from outside these zones, or if within these zones; at roof level.

The development itself is unlikely to contribute substantially more trips to the local road network than would it's existing landuse class (were the SSE buildings fully occupied). In this way, I regard the air quality relevance of these proposals to be mostly concerned with exposure of future residents (as described above) and in terms of other relevant policy - for example, permeability of the site to pedestrians & cyclists, to encourage displacement of trips from private motor car to active travel modes. This applies to customers of the hotel / public house as it does to employees and future residents.

In this respect, it appears from the draft masterplan that it is intended that the site takes all accesses for all forms of travel from Bartons Rd. No cycle / pedestrian access is provided in the south or west of the site. Accessibility to the pub from Stockheath Rd / Martin Rd. appears relatively poor, and desire-line for site residents for trips by active travel modes to destinations in

the civic campus area or Havant town centre is around 400m longer under the draft plan that it would be if a direct access were provided in the South of the site (discouraging travel by active modes).

I note that the site is currently well screened by tall mature evergreen stand, and in relation to on-site exposures (discussed above) this may contribute to reduced concentrations on site. It appears from the masterplan that it is intended to retain this tall / dense screening, and this may be a factor in the absence of an access in the west of the site. It would likely be commercially desirable to open up the Western boundary to Petersfield Rd., for visibility of the hotel / pub. This may provide an opportunity for an access footway / cycleway.

I note that the Highway consultee requires footway & cycle access to the subway located just South of Garage (& Travel Plan), and recommends applicant consider delivery of aspirational cycle map 2036. These recommendations are compatible with improving the credentials of the site in terms of mitigating / avoiding unnecessary trips by motor car, and on this basis I would support them fully.

Drainage / SuDs (Pollution)

This site is likely to be suitable for infiltration drainage. The site itself is likely to represent a low pollution risk (in terms of new pollution). Infiltration drainage may however be relevant to the consideration of existing contamination, and could influence the rate of mobilisation or distance that it may travel. I would recommend that any future site investigation undertaken include provision of boreholes aiming to intercept groundwater, in order to assist with assessment of these risks.

Mr. Jonathan Driver
Environmental Control Officer