

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/18/00010	Your Ref:	APP/17/01243
EH Case Officer Extn:	44 6671	Date:	25 January 2018
DC Case Officer:	Rachael McMurray		
DC Case Officer Extn:	44 6546		
Application Number:	APP/17/01243		
Site Address:	208 London Road, Waterloo, PO7 7AN		
Proposed Development:	Erection of a single storey building to accommodate a nursery for a maximum number of 78 children including outside play area together with formation of car park, provision of boundary treatment and landscaping and alterations to existing pedestrian and vehicular accesses following demolition of existing house.		

Observations / Comments:

I have reviewed the supporting documents to this application, and would like to provide comment on Contamination, Transport / Air Quality, and to a limited extent, drainage.

Contamination

Please see EH responses to APP/16/01122 & GEN/16/01082 which both refer to potential sources of contamination in the vicinity of this site.

No information has been submitted with this application that would materially alter the previous conclusions, and I note that the both the description of how outdoor space is to be used, and the age range of children intended to attend the facility, would indicate that these alternative proposals continue to represent contamination sensitive landuse.

Contamination is arguably more likely to be present in areas of the site to be used as play space / soft landscaping, and so the risk of an active pollutant linkage is increased.

No objections on contamination grounds subject to any consent granted including the following conditions, or conditions offering equivalent protections:

Investigation of Potential Contamination [1]

Prior to the commencement of any specific phase of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority and notwithstanding any assessment provided with the planning application), 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 shall be undertaken by competent persons, and the findings presented as a written report.

The assessment may comprise separate reports as appropriate, but unless specifically excluded in writing by the Local Planning Authority, shall include;

- 1) A site walk-over survey &/or sufficient desk-based research to identify;
 - All relevant previous uses of the site
 - Potentially significant contaminants associated with those uses
 - Uncertainties relating to previous use or associated potential contaminants
 - A conceptual site model identifying all relevant sources, exposure pathways and receptors, and;
 - A summary of potentially unacceptable risks arising from contamination at the site.
- 2) Site investigation based on (1), 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 receptors that may be affected, including those off site.
- 3) The results of an appropriate risk assessment based upon (1) & (2), 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.
- 4) 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 (3) are complete, identifying any requirements for longer-term monitoring of pollutant linkages, maintenance 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 both previous & current land uses (&/or activities) that could pose a risk to future occupants of the consented dwellings.

Verification of risk mitigation [2]

Prior to the occupation of any relevant part of the permitted development, any verification report required in accordance with **condition [X]** 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 both previous & current land uses (&/or activities) that could pose a risk to future occupants of the consented dwellings.

Drainage

I note that the drainage strategy is left open, and no detailed investigative work has been undertaken to date to inform design work.

The site directly overlies London Clay, which in this area comprises stiff silty clays with low proportion of granular material. Soakaways are unlikely to be suitable, and would not in any

event be recommended where contamination may be present.

I note from our own drainage mapping that the chamber shown to be present on the adopted surface water system just inside the curtilage of number 206 carries metadata indicating it's position to be "IN REAR GARDEN NUMBER 208".

It is not unlikely that surface water drainage at 208 discharges to this system at present, and in any event, it would appear that both foul & surface water connections will be possible to public systems. Increases in site runoff rates, on-site attenuation and controlled release area all subjects for the LLFA & sewage undertaker to address. From a pollution perspective, I would only be concerned about drainage insofar as it might play a role in the contamination assessment 'conceptual site model'. No adverse comments.

Transport / Air Quality

I note several comments and objections relating to customer parking, and that the planning statement indicates around 70% customer trips expected to be by car. On site provision is unlikely to accommodate the quantum of places, and I would consider that the site is more suited to a 'park & stride' type travel model.

I would agree with the 'expert town planner' representation, that use of free car parks adjacent to ASDA is likely, especially considering the distance(s) to unrestricted parking on feeder roads to London Road generally exceeding those to the ASDA facilities.

This arguably presents an opportunity to formalise this arrangement in a travel plan in partnership with ASDA, who may benefit from favourable publicity and the opportunity for linked shopping trips in association with customer collection / drop-off.

Whether or not this arrangement is formalised, it is likely to be used in preference to the higher risk drop-off parking arrangements that the objections fear, and whilst this would involve crossing a roads, both the (non-A3 section of) London Road and Rockville Drive are both lightly trafficked relative to the A3, and speed limits are low, so I have no specific concerns about safety from conflict with traffic on the A3.

In terms of air quality exposure - I have previously noted that exceedance of the LAQM objective for Nitrogen Dioxide is not unlikely to be exceeded at the kerbside of the A3, and especially near the A3 / Rockville Drive junction.

The proposed building is however set back some distance from the kerb, behind the existing building line (facade of no. 206 or extg. 208). With reference to concentration / distance relationships, I am confident that exposure within the proposed building and associated play areas would be acceptable.

I have no adverse comments to make with regards air quality.

Mr. Jonathan Driver
Environmental Control Officer