

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

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

Our Ref: CONS/17/00649 **Your Ref:** APP/16/01237

EH Case Officer Extn: 44 6677 **Date:** 03 April 2017

DC Case Officer: Lewis Oliver

DC Case Officer Extn: 44 6263

Application Number: APP/16/01237

Site Address: Mill Rythe Holiday Village 16 Havant Road, Hayling Island, PO11 0PB

Proposed Development: **Proposed Development:** Demolition of 6,111 square metres of redundant chalets and facilities buildings, use of land for the siting of 204 holiday caravans including 5 caravans for use as staff accommodation, refurbishment of retained single and two storey holiday chalets to form 87 units of holiday accommodation, retain managers bungalow, sales area for 5 caravans, refurbishment of remainder of central facilities building, CCTV cameras, provision of new pedestrian concourse with terraces, splash and dry play areas, multi-games court, adventure golf course and outdoor theatre and new landscaping. Retaining existing pitch and putt golf course to the east of the site.

Observations / Comments:

I have read the supporting documentation for this application, and have reviewed the site context against the available spatial information & other anecdotal information resources. The planning history is of particular interest, and is considered to be indicative of the potential presence of a number of contaminants at the site - potentially representing both point sources, and widespread contamination.

It is understood from historic mapping that the holiday park was likely to have been constructed in 1932 (one map issue shows the site, the other not - indicating a narrow date range). Since this date, a significant number of planning applications have been submitted / approved. I have not been able to undertake a comprehensive search of our archives to determine locations of features of interest, but the points below briefly pick out relevant applications;

- *518 - conversion of air raid shelters to sanitary blocks.* Assume above ground - potential for below ground elements, potential for partial fill for purposes of level amendment - Asbestos Containing Materials (ACM) & other general Made Ground remains possibility (Clinker etc.)
- *4756/1 - store & swimming pool infiltration plant house.* The term "Infiltration" in this context is ambiguous, unclear whether representing disposal of pool water to land (inc. chlorine & other chemical agents - e.g. flocculants, often metals), or simply to house 'filtration plant'.

- *14643/4 - demolition of existing wooden chalets.* Indicative of the structure of original chalets at the site. Likely finished in lead paint, likely that regular maintenance would have been undertaken during the period of use - this often leads to significant lead concentrations around the footprint of such structures. (also see 14643/8, .../17, 7456/7, 22567/9)
- *14643/09 - petrol filling station & wash-down area.* Whether tanks were above or below ground, this use represents a localised hydrocarbon contamination risk through tank, leakage, spillage from filling, and from leakage from associated interceptor chambers or distribution pipework. tanks may represent a structural hazard if not currently in use, and not 'made safe' (tanks at elevated risk of corrosion when largely empty)
- *14643 - boathouse adjacent to the lake.* Depending on type of craft housed - potential for contamination from fuel / engine maintenance, and for all craft (given dates), physical maintenance & repair of hull / internals - paint, lead, resins, oils, varnishes & solvents (localised)
- *14643/27 & ...31 - ...boiler house, tank room.* Oils/solid fuel & combustion residues.
- *22467/1 - new flue to kitchen boiler house.* May represent different boiler house than those mentioned in 14643/27 & .../31
- *22567/7 - ...stillroom.* This term can be used to reference a number of different uses - given the date, unlikely to carry the same meaning as the historic - but could in theory refer to activity where potentially contaminating materials would have been stored and used, especially is used as a distillery, or in the local production of soaps and cosmetics for use at the site.
- *87/22567/34 - 2" narrow gauge railway.* Given the year, not likely to represent a significant risk (e.g. may be electric); however there remains some risk of contamination impact similar to those for the boathouse - fuel, oils/lubes/metals/solvents (maintenance), especially where the locomotive and carriages were housed.

Beyond the above, there are numerous applications relating to the demolition, construction, and alteration of chalets and service buildings at the site. Simply given the number of phases of work, and the respective construction dates, there is a substantial risk of asbestos containing materials being present within the buildings demolished to date. Similarly, given the coastal location, and number of wooden structures, lead is likely to have been released to the site, and could be significantly elevated within made ground consisting of construction & demolition wastes (disposal to land would not have been uncommon practice during some of the periods of activity, whether as used in construction, or for the purpose of disposal).

I recognise that the exposure profile of a holiday park is less sensitive than residential, however whilst the frequency &/period of exposure may be low, young children can be expected to be present & to have relatively high exposure risk when on site (due to focus on play & recreation).

The application represents a substantial redevelopment, and it is therefore considered both appropriate and proportionate to require that these risks are quantified, and if necessary, appropriately addressed. Given the scale of the site, the desk based elements are considered to be especially important, and should aim to draw upon information resources beyond the standard environmental search providers (i.e. should draw upon site specific records).

I also note that consent no. 518 refers to conversion of air raid shelters. These are likely to have been necessary as the site lies on the main Luftwaffe flightpath to the Royal Navy Dockyards, and Fort Cumberland at Portsmouth. Further, a number of bombing decoys were known to be located within Langstone harbour, the closest recorded being less than 2km due east, but mobile decoys were also likely to have been utilised at the island. For this reason, Hayling island received a relatively heavy bombardment in comparison to sites further inland.

Whilst it appears that at least part of the site was in use before the war (reducing the risk of UXB being dropped at the site without being recorded), its presence does remain a possibility. I would recommend that the desk-based assessment of the site consider UXO/UXB.

I have no objection to the proposals, subject to conditions to secure the appropriate assessment of contamination risk for the protection of future occupants, and sensitive environmental receptors (e.g. Chichester Harbour SSSI / SPA / SAC / RAMSAR).

Site Investigation / Remediation [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), 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 employees & guests at the site, and/or to adjacent sensitive environmental receptors.*

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 both previous & current land uses (&/or activities) that could pose a risk to future employees & guests at the site, and/or to adjacent sensitive environmental receptors.*

If you are minded to treat the UXO recommendation as being separate from the contamination risk, I include suggested condition wording below.

UXO & UXB (Desk Study & Watching Brief) [3], optional - can be treated as a 'contaminant' risk under [1] above]

“Prior to the commencement of construction of any part of the development approved by this Planning Permission, a desk based study to assess the likelihood of the presence of historic unexploded ordnance (UXO) or bombs (UXB) shall be submitted to and approved in writing by the Local Planning Authority. Where non-trivial potential for the presence of UXO/UXB has been identified at the site, the study shall include details of a protocol for the identification and assessment of possible ordnance that may be disturbed during construction (a ‘watching brief’).

If, during development, any suspected historic ordnance (UXO/UXB) is found to be present, no further development shall be undertaken until the object has been assessed by an appropriately qualified person, appropriate actions taken to remove or make safe the object, have been undertaken, and the Local Planning Authority notified.

The provisions of the approved ‘watching brief’ shall be observed throughout the undertaking of all relevant construction activities (i.e. below ground works – excavations for foundations, buried services & SUDS)”

Reason: *The site is in the vicinity of former strategic sites known to have been targeted by aerial bombardment during the 2nd World War, such that it is considered that there is an elevated potential for the presence of unexploded ordnance at the site. To manage the potential associated risk to both groundwork personnel & future residents, with due regard to policies DM10 of the Havant Borough Adopted Core Strategy [2011] and DM17 of the Havant Borough Local Plan (Allocations) [2014]*

Mr. Jonathan Driver
Environmental Control Officer