

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/17/01788	Your Ref:	APP/17/00863
EH Case Officer Extn:	44 6677	Date:	19 September 2017
DC Case Officer:	Rachael McMurray		
DC Case Officer Extn:	44 6546		
Application Number:	APP/17/00863		
Site Address:	Southleigh Park House, Eastleigh Road, Havant, PO9 2PE		
Proposed Development:	Hybrid Application - Full Application for change of use, alterations to and extension of existing buildings to 20 Residential units, (13 dwellings in the main house and 7 in other Listed Buildings) with associated landscaping parking and amenity space. Outline Application (All Matters Reserved except means of access) for the demolition of 1983 office building and associated brick and glass corridor link and development of up to 70 residential units, associated landscaping, parking and infrastructure works.		

Observations / Comments:

I have read the supporting documentation, and would like to make some comments on areas relevant to pollution, contamination, and air quality.

FRA & Drainage (SuDS) strategy (160720-04C) July 2017:

Errors in the text result in some ambiguity as regards the required attenuation volume. Paragraph 4.2.1 states that the proposed peak runoff for a 1 in 1 year (annual return) storm event to be 261.3 l/s for the proposed development at 1.85 ha impermeable, and 1.35ha permeable 'greenfield'.

Table 4-1 uses the term 'maximum surface water discharge rate' (land runoff), calculating an attenuation storage requirement of 1150 m³ at a controlled discharge rate of 11 l/s. The geocellular storage (draining 1.8 ha impermeable area) provides a maximum storage capacity of 501m³. The storage available within the settlement pond / attenuation basin is to be 304 m³, assuming a 150mm freeboard. The 1245m² total area x 0.15m freeboard yields around 180 m³ storage volume, short of that indicated. Similarly, the 501 + 304 m³ capacities of the attenuation features appear to fall short of the 1150m³ site wide requirement. Additionally, the 1150m³ site wide requirement would appear to be based upon an annual return event, and not a 1 in 100 year event, and not explicitly accounting for storm intensity increase due to climate change. This may be a result of typographical error - but should be confirmed.

Table 3-1 indicates the greenfield 1 in 100 year return discharge rate (without explicit allowance for climate change) to be 23.7 l/s. It is unclear why 11 l/s has been selected as the site runoff flow control metric, as this not only betters the existing site runoff rate, but is also less

than half the greenfield runoff rate. It is implied that this is related to the QBAR rate, but calculations have not been provided. Again, this should be clarified, and the advice of the LLFA should be sought as the appropriateness of the assessment.

There are also errors noted in table 7-4 (SuDS Pollution Mitigation Index Summary); it is not clear that all measures will necessarily operate in series (as indicated), and the 0.5 factor for secondary / tertiary control has not been applied. These factors do not alter the conclusions unchanged (the proposals are adequate in principal), however table 7-4 does over-state the margin of safety, and subsequent design changes using the presented methodology could in principal leave the development under provisioned in terms of pollution attenuation capacity.

Transport Statement (160720-01D July 2017) and Residential Travel Plan (160720-06D July 2017)

The transport statement concludes that the overall proposed residential use will result in approximately 90 fewer vehicle trips on a daily basis. This assessment appears reasonable given current site usage, until recently (if not currently) as a head office, with considerable area of land given over to the parking of passenger car vehicles. From the perspective of its contribution to local air pollution (by means of traffic generation), I have no adverse comments to make.

From the perspective of its contributions to achieving incremental improvements in air quality relative to the development density within the Borough, I note that the access strategy as segregated entrances / shared surfaces, each entrance serving <50% total development traffic. There is provision for a footpath on Western boundary to parallel Eastleigh Road, and the indicative masterplan provides for the site to be fully permeable to both pedestrians and cyclists - which is positive for the promotion of forms of travel that are active &/or sustainable (as an alternative to use of private motor vehicles, PCU's)

The residential travel plan sets a 10% reduction of single occupancy passenger car PCU trips, applied in such a way as to correspond in practice to a rate of approximately -12.66% (proportional). Similar indicative target for active & public (sustainable) travel modes.

I note that there is no target for multi-occupancy (PCU) vehicle trips, which are not accounted for in either related metric (i.e the 10% reduction in single occupancy PCU trips, or in the 10% increase in sustainable travel). This lack of target closes off a useful and potentially productive avenue of reducing vehicle kilometres, and should arguably be included.

The travel plan is ultimately for Hampshire County Council to oversee & enforce, and Havant Borough Council are essentially reliant upon HCC to implement a successful strategy.

It is noted that the indicative parking allocation substantially exceeds calculated demand, but falls marginally short of the parking policy requirements. From the perspective of encouraging sustainable travel, it is preferable for parking allocation to fall slightly short than to be over-provisioned, so I have no adverse comment on the proposed provision.

Geo-Environmental Desk Study Report (GE15562\DSR\June16v1)

The desk study identifies gas from the off-site Southleigh domestic waste / co-disposal landfill site as the greatest risk to the site. Generic risks anticipated on site, but the report fails to identify prior B1b) & c) land uses (Research and Development Laboratory & General Industrial Process uses), the heated greenhouses or the risks associated with the numerous temporary structures variously present across the site throughout under the tenure of Plessey Avionics.

Plessey's Martin Road site was identified as being subject to material contamination. It is understood that this larger site was also used as a research and development site. The scope of use by Plessey of the Southleigh Park House site is unclear, and this is an area of research that would likely prove both fruitful and informative of phase 2 works. The planning history for the site includes some 56 prior applications, with numerous phases of proposed alteration / adaptation, and numerous proposals for siting temporary structures. This degree of activity is a risk factor in and of itself.

It is considered that there is an elevated possibility of on site contamination than is presently identified by the submitted Desk Study. As is indicated above, further research could be beneficial (e.g. into the position of any boiler house, fuel type, and location of fuel store; or the specific activities undertaken at the site, and the relative positioning of, those activities, under the industrial land use classifications) to inform phase 2 works. Otherwise, I would recommend that the proposed phase 2 works are implemented with a significantly broadened scope to include a greater emphasis on non-targeted/general assessment.

Risks are considered to relate in particular to the presence of lead, arsenic, and copper; asbestos containing materials in made ground, and to a 'mound' which may represent a former waste disposal feature, commonly associated with large properties such as this. There is similarly a risk of impact by military activity - a pillbox installation was formerly present opposite the site on the Horndean Road, and large houses such as this were commonly commandeered by the military for operations during WW2. There may (therefore) be an elevated UXO risk associated with wartime use.

Other

The design & access statement makes more than one reference to the deliverability of the site being 'challenging' in terms of viability. This is presented in support of a reduced affordable housing provision, but represents a risk factor for the contamination assessment and any subsequent remedial requirements.

Havant Borough Council needs to be reasonably confident that any remedial requirements necessary to make a development acceptable in both planning and health terms will not prejudice the deliverability of a scheme. Depending upon just how marginal viability is, it may be necessary for the applicant to demonstrate that the likely costs associated with remediation (or the mitigation of contamination risks) are compatible with a deliverable development, prior to a detailed consent being granted.

I shall take Development Management's advice on whether this is material to the outline consent or not, but if not, I would stress that a robust intrusive investigation and risk assessment should accompany any reserved matters application which enables the development approved in principle to be begun.

I do not anticipate that the measures required to enable the change of use and alterations / extensions would prejudice delivery, but I would again refer to the degree of marginality indicated within the viability assessment (not reviewed by Environmental Health).

Recommendations:

No objections in principal subject to conditions requiring a robust assessment of risks associated with the prior domestic, agricultural, industrial and wartime use of the land - and the gas risks associated with off-site landfill. Suggested conditions below, to be included on both the detailed and outline consent;

Condition [1] - Contamination Assessment

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 site occupiers*

Condition [2] - Verification (Standard)

*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 site occupiers.*

Condition [3] - UXO & UXB (Desk Study & Watching Brief)

"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 adjacent to former military fortifications, potentially indicative of active use of the extant residence &/or estate during the 2nd World War, e.g. for training and staging purposes, by regular forces or home guard activities. The presence of unexploded ordnance is not considered implausible. To manage the potential associated risk to both groundwork personnel & future residents, and having due regard to policies DM10 of the Havant Borough Adopted Core Strategy [2011] and DM17 of the Havant Borough Local Plan (Allocations) [2014]*

(please note, some UXO management companies offer preliminary risk assessments based upon historical records that are either free or at very low cost).

If there is a suspicion that the recommended requirements will render the development undeliverable (having regard to the need for a reasonable return to a willing developer - as laid out in national policy), then the development should be refused.

Mr. Jonathan Driver
Environmental Control Officer