

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/16/01732	Your Ref:	APP/16/01271
EH Case Officer Extn:	44 6677	Date:	04 January 2017
DC Case Officer:	Daphney Haywood		
DC Case Officer Extn:	44 6513		
Application Number:	APP/16/01271		
Site Address:	70 Havant Road, Hayling Island, PO11 0LR		
Proposed Development:	Erection of 1No. three bed and 3No. four bed two storey detached houses with associated garages.		

Observations / Comments:

I have reviewed supporting documents for this application, alongside the available spatial resources. I would like to provide comment with respect to Ground Contamination Potential, Drainage (Flooding & Pollution), and Air Quality.

Drainage / Flooding / Pollution

It is understood that a surface water connection to an operational sewer is possible from the watercourse on the northern boundary of the application site. Onward communication from here is unclear, but is assumed to connect via pipework underlying Havant Road, to West Lane, and to discharge to open watercourse near Aston House, and ultimately to Langstone Harbour (benefiting from EU environmental protections).

It is noted that the site is not likely to be suitable for soakaways due to an anticipated shallow depth to groundwater, and due to bedrock geology comprising clays, limiting the depth of permeable strata supporting lateral flow. Availability of onward surface water connection negates need for soakaway, but will conversely increase runoff rate from the plot - especially when considered against the substantial increase in coverage of the plot by hard surfacing.

Central flooding policy (e.g. as integral to statutory reinsurance schemes) expressly expects the planning system to ensure that new development does not increase flood risk elsewhere. Whilst it is accepted that there is not a significant number of existing properties on the expected surface water discharge route, increased risk of localised flooding could result - especially if exacerbated by tidal conditions at the outlet. The increase in the rate of runoff from the site should be assessed alongside the contribution of the development to downstream flood risk. Any unacceptable risks should be mitigated (e.g. by storage & controlled release). I note that the engineers believe land drainage consent from LLFA to be required for discharge to the drainage ditch. Comments should ideally be sought from the LLFA in regard to flooding issues, as these fall outside the remit of Environmental Health where there are no related pollution issues.

In this respect, whilst the downstream discharge environment is of high sensitivity, the inherent risk of the development represents a relatively low pollution risk. Receiving waters are particularly sensitive to nitrates & ammonia, and the greatest pollution risk is likely to be mis-connection of foul / grey water inputs to the surface water system.

It is likely to be appropriate to seek to prior approval of a detailed scheme of surface drainage, subject to the advice of the LLFA as the appropriate authority to advise on flood risk.

Contamination Potential

Historic map coverage is sporadic for this location. It is however noted that it appears some structures on site have been constructed / demolished over the history of the plot;

1. Building immediately north of #70, shown 1879 only, approx. 6.0m x 5.5m; nature & use unknown
2. Building immediately south of #70, shown 1969 only, approx 3.5m x 3.5m (possibly granary)
3. Rectangular building approx 7m East of #70; shown 'porched' in 1867, porch removed 1909, square addition in 1932 (4.5m x 4.5m approx.), remained present 1969 (Unclear when replaced with extant structure present approx. 1m East, but appears to represent a different building - 1946 aerial photography confirms proximity of older structure to #72 to be incompatible with mapping error, i.e. does not depict extant building to the rear of #70).
4. 1946 aerial photography also appears to show an otherwise unrecorded structure (approx. 6 x 3m) in the North of the rear garden to #72 - casting shadow - possibly agricultural building, tank, or large vehicle.

Buildings comprising No's 70 & 72 are not referred to as a 'Farm' on historic mapping, though it is understood that this is the case. The Land parcel to the North of #70 is shown to be in use as a formal (likely commercially productive) orchard, occupying a plot of approx. 1/4 acre.

The principle contamination risk at this site derives from the potential for localised deposits of cement bonded chrysotile asbestos associated with former temporary structure(s) described above, and from ground improvers / pesticide / herbicides that may have been used at the orchard. These may include ash, or persistent metallic substances.

The residential use proposed is considered to be contamination sensitive, comprising family homes with private garden areas. The degree of sensitivity would apply irrespective of development density. I have no objection to the development on ground of contamination potential subject to the following conditions:

Contamination (Standard) [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 previous land use (&/or activity) that could pose a risk to future occupants.

Verification (Standard) [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 previous land use (&/or activity) that could pose a risk to future occupants.

Air Quality

Air quality is known to be poor at the kerbside to Havant Road, with exceedance of the annual objective for Nitrogen dioxide having been measured close to the A3023 carriageway (~250m South). No exceedances of relevant standards are expected to have occurred at existing residential property along Havant Road.

I note that the proposals place the new property fronting Havant Road no closer than existing relevant exposures. Occupants are therefore not expected to be exposed to unacceptable air

pollution from road traffic.

In terms of the contribution of the development to road traffic growth / air pollution, it is acknowledged that residences on Hayling Island tend to be more reliant on private motor car for transportation (than those on the mainland). I also note that parking provision appears to be in line with parking policy, and is not excessive (i.e. does not serve to actively encourage occupant acquisition of additional motor vehicles).

Whilst new residential development is considered to represent traffic that is 'new' to the local road network, the daily trip rates associated with development of the proposed scale are not considered likely to be material, assuming that the access & parking arrangements are suitable, and do not interfere with traffic flows on the busy Havant Road.

I have no adverse comments on air quality grounds.

Mr. Jonathan Driver
Environmental Control Officer