

**HAVANT BOROUGH COUNCIL**

**Town & Country Planning Act 1990**

**Consultation on Planning Application**

**MEMORANDUM**

|                              |                                                                                                                                                                                                                                                                                                   |                  |                            |
|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|----------------------------|
| <b>From:</b>                 | <b>Environmental Health</b>                                                                                                                                                                                                                                                                       | <b>To:</b>       | <b>Development Control</b> |
| <b>Our Ref:</b>              | CONS/23/03381                                                                                                                                                                                                                                                                                     | <b>Your Ref:</b> | APP/21/00601               |
| <b>EH Case Officer Extn:</b> | 44 6677                                                                                                                                                                                                                                                                                           | <b>Date:</b>     | 18 June 2024               |
| <b>DC Case Officer:</b>      | David Eaves                                                                                                                                                                                                                                                                                       |                  |                            |
| <b>DC Case Officer Extn:</b> | 44 6549                                                                                                                                                                                                                                                                                           |                  |                            |
| <b>Application Number:</b>   | APP/21/00601                                                                                                                                                                                                                                                                                      |                  |                            |
| <b>Site Address:</b>         | Land adjacent to Bosmere Medical Centre, Solent Road, Havant                                                                                                                                                                                                                                      |                  |                            |
| <b>Proposed Development:</b> | Proposed Portsmouth Water Headquarters building (Use Class E(g)(i) use); widened access onto Solent Road; and associated access, car parking, landscaping and works; including the felling of 7No. trees the subject of TPO No.1801 in order to improve the access and allow for the development. |                  |                            |
|                              | <b>RECONSULTATION REQUEST for revised plans and/or documents received</b>                                                                                                                                                                                                                         |                  |                            |

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**Observations / Comments:**

*Contamination*

No change in advice. The 'unexpected contamination' condition proposed by Portsmouth Water ('condition 3' 21/11/2023) will be sufficient to manage residual uncertainty with respect to the chemical quality of soils at the site. Use of this condition is supported, and I have no other recommendations to make in respect of contamination risk

*Transport Demand & Air Quality*

The previous assessment was based upon 818 AADT. The latest revision to the development proposals includes a significant reduction in quantum, with a resulting ~65%-75% reduction in anticipated transport demand. As might be expected, this has reduced the direct air quality impact of the development proposals, given that no on-site combustion processes are anticipated & that transport demand is reduced.

The question against planning policy (NPPF 2023 180 e) & to a lesser extent, the emerging local plan) is '*are the proposals to offset emissions (to air) sufficient to mitigate &/or offset the likely magnitude of development-related harms?*'.

It was concluded that this was probably the case for the previous mixed-use scheme, and the balance has to some extent improved under the office-(PWC HQ-)only scheme.

The policy environment has however tightened since the original application date, and I note that the local Highways Authority has made material representation with respect to sustainable travel, the local transport plan and transport mode-shift; and integrating these areas into an integral package to achieve transport, air quality and climate-change policy objectives.

I would highlight that there is additional support from air quality policy objectives for the enhancements sought by the Highways Authority where these seek to;

- avoid disproportionate effects on the local road network, e.g. at busy junctions, or through operation of vehicle gates at the site access
- contribute to the facilitation of sustainable and active travel choices by Portsmouth Water employees (e.g. s278 access works)
- facilitate the shift of existing trips on the local road network currently made by motor car, to sustainable and active modes of travel (e.g. s106 contribution to the aspirational scheme along the Solent Road Corridor)

I would also note that the Highway Authority had previously raised similar concerns about the framework travel plan, and that these have now been resolved in the latest version.

I had previously commented that the overall parking quantum appeared to have potential to fall short of SPD, and that this could be supported as applying natural pressure on trips by private motor car (assisting modal-shift). It now appears that that scheme has a slight over-provision relative to SPD, which could be argued to have the opposite effect. I do note the EV servicing provision level of 20% of parking spaces, and would support this on Air Quality grounds as a measure supporting use of (U)LEV's and reduction in combustion derived air pollutants.

It is possible that the over-provision will contribute to the parking quantum of an anticipated future re-submission of a revised scheme of commercial development – and the planning question will be whether or not the quantum being sought under this scheme is excessive for the scale of the current scheme given the inherent sustainability of this location and the requirements & objectives of LTP4.

#### *Air Quality – Emissions offsetting*

Notwithstanding the tilted balance arising from the reduced development quantum, I have reviewed the design & access statement, energy & sustainability statement and BREEAM pre-assessment.

I note some enhancements arising from amendment to the Building Regulations concerning the thermal performance of building elements, and also an apparent significant enhancement to the solar PV provision at the site, despite the reduction in available roof-space.

In respect of the latter, I would flag an anomaly in how this provision has been accounted for – the proposal has been uprated from 15.5 kWp to 40 kWp (88.4 sq.m to 183 sq.m, or 52-108 panels); however, the contribution from solar to energy use offsetting has fallen from 11083 to just 2620 kWh/annum. This would appear to be either a simple error, or an account of the solar contribution to the development energy needs only (e.g. ignoring energy exported back to the grid). It may be relevant for climate & sustainability policy purposes for this apparent anomaly to be resolved. It is not material for air quality purposes, for the reasons described above.

No objections arise.

#### *Surfacewater Drainage (SuDS) & Pollution*

Advice as previously. No objections arise. The comments of Portsmouth Water Company in respect of the need for staff parking areas to be served by an interceptor chamber; I would comment that this is not a strict requirement for general car parking areas (staff visitors). Yard

areas serving frequent LGV & HGV movements, or the offloading/handling of bulk liquid or powdered products would be required to be served by a suitable interceptor unit – but it is understood that this is unlikely to apply here.

This notwithstanding, the conditions proposed by Portsmouth Water (numbered 1 & 2, 21/11/2023) are supported for surety.

#### *Construction Management (CEMP, Noise, Piling, Solution Features)*

##### **CEMP**

I was not able to identify a revised CEMP within the application documents, and consequently the recommendations given within (our ref-) CONS/22/01113 13/10/2022 remain valid.

I note that both Environmental Health and the Portsmouth Water have recommended construction management conditions in respect of a CEMP & Piling Condition. There is remarkably little overlap between the specific provisions of the respective CEMP conditions, so imposition of both (without consolidation) would not apply duplicate controls, and consequently consolidation for the purpose of minimising the number of imposed conditions would have minimal value.

##### **Piling / Noise**

In respect of piling, the general 'prohibition without prior approval of method' condition proposed by Portsmouth Water ('Condition 4' 21/11/2023) would provide the opportunity sought by Environmental Health to avoid the use of unnecessarily noisy piling methods. I would suggest the following consolidation (to replace Condition 4 21/11/2023 & Condition 3 CONS/23/02739 11/12/2023);

##### **Condition [X]**

*Piling or deep foundation using penetrative methods shall not be carried out other than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.*

*Reason-To ensure that any proposed Piling or deep foundation using penetrative methods does not harm either groundwater resources or the amenity of nearby residents, in line with paragraph 180 of the National Planning Policy Framework '23, Position statement N8 of the 'The Environment Agency's approach to groundwater protection', and policies CS16(6) & DM10 of the Havant Borough Local Plan (Core Strategy) 2011*

##### **Piling [Informative]**

*If piling is to be undertaken on this site, the least intrusive noise and vibration method of piling shall be employed at this site which is still capable of meeting the primary objectives of minimising short-term turbidity within the principal aquifer, or any long-term change in the degree of continuity between perched & deeper groundwater bodies. When seeking written consent, the application should be supported by an options appraisal and method statement which includes a reasoned justification for selecting a particular piling method, and which outlines any proposed mitigation methods to be employed to ensure that potential adverse effects (on groundwater, or upon local amenity) are minimised. It is expected that any submission under condition [X – Piling] will be decided by the Local Planning Authority following consultation with The Environment Agency, Portsmouth Water and Environmental Health.*

## Solution Features

I note that Portsmouth Water support the concept of a watching brief for solution features. As previously advised, I remain unclear on how this would work in practice for anything other than relatively small features.

I assume that it is anticipated that any features identified via the Watching Brief can be made safe using engineered fill, or can be bypassed through using penetrative methods (e.g. piling) that found in competent strata below. Interpreting stand-off zones as 'avoiding build-over' – I am unclear on how this could be resolved without re-positioning the building, so I would assume that (where stand-off is necessary because features cannot be filled or bypassed-) the applicant anticipates bridging such features using foundation beams on a modified support scheme.

It is implicit that the applicant & Portsmouth Water (and the Environment Agency, which has not made a specific comment-) agree that these reactive options would be feasible (available without material harm to deliverability).

I am aware that Development Management has taken a different approach to similar risks to other developments, but the examples I have in mind are positioned in the north of the borough in a very different part of the aquifer system, with surface expressions identifying large features. Equivalent risks do not necessarily apply at the spring-line, and we might expect any solution features in this part of the aquifer system to be present at shallower depth than those within present the upper catchment. I would concede that the body which might be expected to have the best working knowledge of the principal aquifer system would be Portsmouth Water, so it is reasonable to defer to it's expertise. No objection arises.

**Mr. Jonathan Driver**  
Environmental Control Officer