

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/16/01493	Your Ref:	APP/16/01038
EH Case Officer Extn:	44 6677	Date:	31 October 2016
DC Case Officer:	Daphney Haywood		
DC Case Officer Extn:	44 6513		
Application Number:	APP/16/01038		
Site Address:	157 Milton Road, Cowplain, Waterlooville, PO8 8RE		
Proposed Development:	Outline application for residential development (10No. flats).		

Observations / Comments:

I have reviewed the supporting documentation to this application alongside the available spatial resources, and the contents of the casefile for application no. 98/52480/002 (change of use from petrol station to convenience store, 157 Milton Rd.). It is noted that:

- c13 to 98/52480/002 refers to the assessment of contamination, but is limited in scope, referring to water pollution potential only.
- Reference is made to the decommissioning of above ground infrastructure associated with the operation of the petrol filling station (only). No references are made to the removal of below ground services.
- 4 no. below ground petroleum spirit tanks remain on site, filled with RG22 Hard Foam
- 1 no. below ground diesel tank remains on site - it's status is unclear, however it is known that there was no requirement to fill this tank, and so it is possible that it remains on site as an unfilled void.
- The Environment Agency had sight of some information, sufficient to lead to it recommendation to discharge c.13; but that there was only around 21 days between the recommendation for an Contamination Assessment condition to be included on the decision notice, and the recommendation for that condition to be signed-off. This time-frame allows for very little time to a) grant consent, b) commission an investigation, obtain results from the laboratory & report, c) consult on results, and d) respond.
- No report is held on file, so I cannot comment on the scope or suitability of any investigation submitted in support of the discharge of c.13
- Interceptor units in place at the site could have represented an ongoing / continuing / new contam'n source in the period between 1998 & 2016. This unit is referred to as 3-stage, which is not unlikely to be brick built, and therefore a contamination risk.
- The Site Fire in 2014 post-dates original SI.

Despite the apparent completion of a prior site investigation, I note that the required scope was different to that which would apply to the end users following redevelopment to a residential landuse. The timing is also a concern, and implies either that a report was already available for

submission, or that the site was scoped out of being likely to be a risk to the water environment by desk based means - e.g. confirmation that tanks were emptied & cleaned. The archive is unclear on the basis for this recommendation. The risk drivers would have been very different however under the 1998 application, and so it is not considered unreasonable to require that soil conditions at the site be confirmed to be suitable for the proposed development.

I therefore have no objections to these proposals subject to the following conditions being included on the decision notice:

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, 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 previous land uses that could pose a risk to future occupants of the site, or to the Groundwater Environment (SPZ4)*

Verification (Standard) [2]

*Prior to the occupation of any relevant part of the permitted development, any verification report required in accordance with **condition [1, above]** 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 uses that could pose a risk to future occupants of the site, or to the Groundwater Environment (SPZ4)*

Geotechnical Constraints

It is worth highlighting the presence of below ground infrastructure - particularly the decommissioned fuel storage tanks. The hard foam filled tanks could present a risk of differential settlement (representing a 'hard spot', within otherwise potentially or comparatively plastic clay strata), and the diesel tank (if unfilled) could represent a limited structural void which may post a risk of collapse, particularly following around 17 years additional corrosion potential and under new structural loading.

The structural engineers should be made aware of their presence, and a suitable foundation solution be formulated that appropriately accounts for these risks.

It is believed likely that the footprint of the proposed structure at least partially overlies the tank location.

Traffic & Access - Air Quality

It is considered very likely that 10 no. residential units would represent a significant reduction in the number of daily trips (by any modes) than would either a petrol filling station, a convenience store, or a short-stay car park.

In this way, these proposals could be regarded as representing a net positive impact upon vehicle trips, notwithstanding that the trips would be 'new' to the road network, whereas visits to a petrol filling station may be combined or diverted trips by vehicles already present on the local road network.

The volumes are unlikely to be significant in any event, and I do not envisage any additional pressure on existing road (or road junction capacity) as a result of these proposals. I therefore have no adverse comments to make in respect of transport & air quality.

Mr. Jonathan Driver
Environmental Control Officer