

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/16/00856	Your Ref:	APP/16/00568
EH Case Officer Extn:	44 6666	Date:	22 June 2016
DC Case Officer:	Heather Lealan		
DC Case Officer Extn:	44 6523		
Application Number:	APP/16/00568		
Site Address:	117 Elm Grove, Hayling Island, PO119ED		
Proposed Development:	Erection of 33No. retirement apartments (Category II type) with communal facilities and car parking accessed from St Mary's Road.		

Observations / Comments:

I have reviewed this application and it's supporting information, where this relates to environmental concerns, e.g. Pollution / Contamination / SUDS / Air Quality / Transport, and to a lesser extent, Sustainability & Noise (which I expect others to review in detail).

I have no objections to the development, subject to the proposals for further environmental assessment & mitigation works being secured by means of suitable conditions. Brief comments & suggested condition wording is provided below, by subject.

Contamination & Asbestos

The ACS Environmental Desk Study concludes a relatively low contamination potential associated with both on-site & offsite sources, but non-negligible risks from on-site asbestos (buildings & soils) and potential contamination associated with adjacent car sales unit & previously external siting of a steam locomotive (believed non-operational) at the site.

I consider that the possibility of encountering made ground is likely to represent the greatest risk at this site - being semi-rural in nature, subject to numerous boundary changes, and with multiple small outbuildings & glasshouses being previously located at the site (in addition to the identified residential properties formerly fronting Elm Grove); it is expected that general made ground is likely to contain ashy combustion & solid fuel residues (previously disposed of to land or used as soil conditioners), tars, metallics, building wastes potentially including asbestos.

Whilst it is recognised that due to age restriction & managed soft landscaping areas, the proposed development represents an inherently reduced exposure risk (than would a conventional residential scheme); I nevertheless concur with the conclusion of the ACS report that a proportionate intrusive ground investigation should be undertaken to characterise shallow ground conditions & any contamination present, and to assess both the degree of risk posed & suitability of soils for re-use (either on site or elsewhere). It is implicit in this conclusion that remediation / risk mitigation to appropriate standards should be both required & evidenced in the

event that unacceptable risks are identified.

It is considered that site investigation recommended by the ACS report should be secured by condition. To ensure efficient compliance monitoring & certainty for future occupants of the site, it is also necessary to include a condition that requires verification of any mitigation works. The following conditions are proposed for these purposes:

Investigation & Mitigation of Contamination Risks [1]

"Prior to the commencement of any specific phase of development approved by this planning permission (other than demolition, site clearance, or any 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 may comprise separate reports as appropriate, but shall be undertaken by competent persons and unless specifically excluded in writing by the Local Planning Authority, shall include;

- 1) An intrusive site investigation based on the proposals outlined within the ACS Desk Study Report Ref: 15-67729 (Jan 2016); 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 identified receptors.*
- 2) The results of an appropriate risk assessment based upon (1), 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.*
- 3) 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 (2) are complete, identifying any requirements for longer-term monitoring of pollutant linkages, maintenance of engineered mitigation measures, 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 (&/or activities) on site and in the vicinity, that could pose a risk to future occupiers of the site."*

Verification (Remediation / Mitigation of Contamination) [2]

*"Prior to the occupation of any relevant part of the permitted development, any verification report required in accordance with **condition [1, part 3]** 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."*

The submitted Desk Study Report also recommends that a pre-demolition Asbestos survey be undertaken, and any asbestos containing materials be removed in accordance with best practice methods. I agree that this would be useful exercise to manage this potentially harmful pollutant, and would recommend that this be secured by condition;

Pre-Demolition Asbestos Survey [3]

"Prior to commencement of the development approved by this Planning Permission (inclusive of demolition & site clearance), a scheme to address the risks posed by the potential presence of asbestos containing materials (ACM's) within the existing structures shall be submitted to, and approved in writing by, the Local Planning Authority. 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 physical site survey, of sufficient scope to enable an indicative description of the nature & location of all potential ACM present; including that enclosed by finished surfaces (i.e. within the sub-structure).*
- 2) Collection of physical samples from suspected ACM for laboratory analysis by Polarised Light Microscopy, to confirm*
 - Asbestos presence (or absence), and*
 - Where present, Asbestos type, and*
 - Where possible, approximate proportion, as a percentage.*
- 3) Where ACM is identified, clearly defined proposals for removal of the identified material (a method statement), to include a description of risk management measures to be observed during removal works, monitoring to be undertaken, and contingency measures.*
- 4) A verification survey & any associated air monitoring results, to confirm that removal has been undertaken in accordance with the method statement (3).*

All elements shall be adhered to unless agreed in writing by the Local Planning Authority."

Reason: *Having due regard to policy DM10 of the Havant Borough Adopted Core Strategy [2011], Asbestos containing materials are suspected to be present within the buildings at the site that could, if not managed during demolition, be released in to the environment (air, soils). Uncontrolled release of Asbestos fibres could pose a risk to future occupants of the site, the occupants of- or those present on- adjacent land.*

Transport & Air Quality

The conclusions of the transport assessment in respect of accessibility are agreed. I note that proposals for parking allocation are a reduction on typical residential standards, but represent approximately +75% of rates imposed by the planning inspector at a similar development in the vicinity.

Some responders to this consultation have indicated that an increased parking provision is preferred. I would accept arguments in respect of differing trip rates for this class of development, and note that data from other completed McCarthy & Stone developments is included for context. This data indicates that trips are not likely to correspond to periods of peak flow, and TRICS data suggests that the existing consented use (public house) is likely to generate a significant number of additional trips (in comparison to the expected development rates). I would also note that the alternative change of use alluded to (Co-Op, under existing permitted development rights) is likely to exceed the existing trip rate, and certainly exceed the trip rate associated with the proposed development.

I would conclude that the proposed scheme is likely to result in a net positive change (in generated traffic), even if the estimates prove optimistic. The site is accessible, and as such, a slight under provision of spaces would serve in this case to discourage car ownership & encourage sustainable travel choices. I would therefore *not support an upward amendment in parking spaces*, am comfortable with current/proposed provision, and would support a slight reduction - assuming unallocated spaces and means to restrict use to residents and visitors if & as necessary.

The risk that future residents may be exposed to locally poor air quality is considered to be negligible, and I note that MVHR is proposed, which typically draws air from roof level, where pollutant concentrations tend to be lower.

The risk of the development contributing to local air pollution (by means of generated traffic) is similarly considered to be negligible (-to 'nil'). It is likely that the development represents a positive change, and consequent minor reduction in vehicle trips to the site (relative to it's consented use).

Ecology & Air Quality

I note few notable species are identified, and that the proposed landscaping scheme is identified as being likely to represent an improvement. I have no adverse comments to make with respect to ecology, and as a positive comment would highlight that the 'greening' of the site with native species of all heights (i.e. hedge / shrub / tree) is likely to represent an improvement not only in terms of biodiversity, but also in terms of the interception & reduction of local air pollution. Whilst levels of local air pollution are expected to be relatively low in this area, any incremental improvements is regarded as a positive step, contributing to incremental reduction of background pollution levels.

Flooding / Drainage / SUDS

I note that the surface water drainage attenuation structure proposed is to be drained by means of a 'twin explosion-proof pump' system, designed to limit SW inputs to public system to <21l/s.

I note that no pollution control measures are proposed, despite the potential for pollutants being acknowledged by specification for 'explosion proof' pumps on the basis of a potential for

flammables to be present within runoff (by surface spillage - e.g. traffic collision or vehicle fuel leak).

Permeable paving is suggested as a potential option, subject to infiltration rates. I would highlight that infiltration not necessary to make use of a permeable paving solution; permeable paving can instead be served by a granular storage sub-base, with collection by means of a buried fin drain (or similar, e.g. perforated pipe collection system). I would recommend this approach as permeable paving has excellent pollution interception capabilities and would be fully compatible with this class of the site in accordance with CIRIA 753 (SUDS Manual).

Similarly (assuming that the destination Surface Water chamber inverts would accommodate gravity drainage) flow control by means of a passive hydrobrake is considered to be a more sustainable & reliable solution to the limiting of runoff rates.

Mr. Jonathan Diver
Environmental Control Officer