

Consultee Comments for Planning Application APP/16/00205

Application Summary

Application Number: APP/16/00205

Address: Havant Railway Car Park, Leigh Road, Havant

Proposal: Application for Prior Approval under Part 18 of the Town and Country Planning (General Permitted Development) Order 2015 - Construction of a 192 space single deck car park.

Case Officer: Heather Lealan

Consultee Details

Name: Mr Environmental Health Team

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On Behalf Of: Environmental Health Manager, Community Group

Comments

Observations / Comments:

I have reviewed the basis for this application, the submitted documentation and the environmental context of the land.

If it is accepted that development is Part 18 permitted development (which appears reasonable, given the provisions of the act), the only grounds available for application of refusal is that the development ought to (& can) be undertaken elsewhere. It is assumed that grounds for application of conditions is limited to injury to the amenity of the local neighbourhood - with presumably also limits the scope of conditions that can be applied.

For the purposes of this consultation, it is taken that development 'ought to be' undertaken elsewhere where the environmental impacts of the development are not acceptable in the location proposed.

Contamination

The risk of contaminant presence on site is high - former sidings, good yard & operational / goods transfer area (including a crane & weigh bridge etc.). Local rail facilities are known to have historically provided transportation services to several local town gas works, and so the local storage & handling of associated raw materials & wastes (coal and coal-tars / ammoniacal liquors etc.) is likely (alongside other general freight), as is a persistent impact upon local soil quality related to both the railway engines themselves as well as the materials handled.

In terms of receptors, the River Lavant crosses the site (within a culvert), and a further branch of

this watercourse is also present on the western boundary (also culverted). Whilst the risk of significant exposure of human receptors to potential contaminants at this site is low, controlled waters receptors are close, albeit potentially isolated from the overburden by the culvert structure.

No construction details are provided with respect to foundation methods proposed. It is assumed that as the superstructure comprises sectional steel pre-fab, that relatively shallow pad foundations are likely. The geology is head gravel underlain by bognoor sand - fluvial deposits are notoriously variable, but Head gravels are typically competent (meaning shallow foundations should be sufficient). Bedrock geology is London Clay in this area, expected to be present to depths exceeding 15m below existing ground level - it is not likely that piled foundations approaching this depth will be necessary, but it should be borne in mind that the site overlies an SPZ1c (sub-surface). Given the likely soil quality at the site, if piled foundations are deemed necessary, exploratory works should be undertaken to confirm that no piles will create a pathway to the principal aquifer (i.e. bear in the chalk).

Environment Agency consent will be required for works that may affect a main river (within 10m), and I expect that the risk of damage to the culvert, creation of contamination migration pathways will be picked up & addressed as part of the permitting process.

Air Quality

No detail is provided with respect to car parking (space) turnover rates. It is assumed that a typical parking trip profile is likely to predominantly confirm to a med-long stay (e.g. transport mode interchange - where even relatively local trip, e.g. Portsmouth / Chichester, are likely to have a journey profile spanning several hours).

Background NO₂ (indicator of vehicular air pollution) was 20.0 ug/m³ in 2014 (relates to 1 x 1km grid square), and local monitoring within the same grid square returned values just 5% above background; less than 60% of it's respective objective value.

In the context of a low-moderate parking space turnover, and natural ventilation / open parking deck proposed - 192 spaces is not considered likely to materially affect local air quality at nearby relevant locations, considering circulating traffic on the elevated deck. Traffic flows on Elmleigh Road are not expected to exceed 7500 as existing, and the proposed additional spaces are not likely to result in sufficient additional traffic (e.g. +15% might be significant) as to have consequential effects at locations adjacent to the wider road network.

Suds / pollution prevention

The supporting statement indicates that the drainage system will account for the principles of the SUDS, and will discharge to existing surface water system via interceptors. This is welcome, as the existing system is very likely to discharge direct to the Lavant, which as previously noted,

passes beneath the site.

Whilst the applicant should ideally be required to demonstrate that the proposed system be compliant with pollution control recommendations of C753 SUDS manual, it is understood that the Local Planning Authority is precluded from granting approval subject to conditions (in this regard). It must be assumed that Network Rail will act responsibly in this regard, and will have due consideration to the quality of discharges to the environment.

Summary

Whilst this development is not without risk - if appropriately addressed, engineering solutions are feasible to mitigate the likelihood of mobilisation of contamination that could potentially be present at the site (to environmental receptors). Further, there are consent requirements which are capable of addressing these risks.

Within the constraints of this type of application, it is considered that there is insufficient environmental grounds upon which to conclude that the development ought to be undertaken elsewhere. On this basis, I have no objections to these proposals.

Mr. Jonathan Driver
Environmental Control Officer