

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/16/00291	Your Ref:	APP/16/00060
EH Case Officer Extn:	44 6677	Date:	09 March 2016
DC Case Officer:	Heather Lealan		
DC Case Officer Extn:	44 6523		
Application Number:	APP/16/00060		
Site Address:	36 Station Road, Hayling Island, PO11 0EQ		
Proposed Development:	Demolition of existing buildings (shop, 1no. flat, workshop, associated compound and 2no. dwelling houses) and construction of 18no. new build flats and 3no. shop units (planning class A1) with associated bin store, cycle store, vehicle parking and landscaping.		

Observations / Comments:

Contamination

It is noted that the Constructive Evaluation Ltd. Phase 1 Environmental Assessment (Ref: 15.8909, Jan '16) identifies tangible environmental risks from on site sources (made ground) and off-site sources (liquid free- or dissolved-phase contamination migrating with groundwater).

Site investigation is recommended, and an outline scope is included. The investigation scope proposes target locations & depth for trial holes, provides an indicative number of samples & suite of target determinands, and makes provision for adapting the investigation scope based upon conditions encountered. Both made ground & natural soils are targeted, and groundwater sampling is included in the contingency arrangements.

These recommendations are considered to be appropriate to the identified potential sources and the scheme under application, and I would recommend that the proposed investigation and ancillary arrangements are secured by condition.

Recommended condition wording as below:

(1) - Investigation & remediation

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 "Constructive Evaluation Phase 1 Environmental Risk Assessment" (Ref: 15.8909); 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.

(2) - Verification

Prior to the occupation of any relevant part of the permitted development, any verification report required in accordance with **condition [X](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 previous land uses (&/or activities) on site and in the vicinity, that could pose a risk to future occupiers of the site.

It is not considered necessary to include an informative on the encountering of unexpected contamination, as the report submitted in support of this application makes appropriate recommendations in this regard.

Drainage

The supporting documents & application form refer to the use of soakaway drainage, whilst not making reference to the use of integrated SUDS. The application states that the site will not contribute to off-site flooding risk, however the proportion of hard-cover across the site is likely to be increased under these proposals relative to the existing, which may inturn increase runoff

rates. No detailed surface water drainage strategy is provided, and it is not clear whether parking bays / paved areas will utilise permeable paving solution, or incorporate any stormwater storage/attenuation and associated flow control. These are issues that I expect the LLFA to directly address, though I have not come across a consultation response attached to the case which identifies surface water disposal as a constraint.

Given the elevation of the site, groundwater is expected to be shallow, and soakaway drainage may not be feasible. Similarly, installation of soakaways in ground affected by contamination is not recommended, and it would not be unusual to preclude this by condition. Until the proposed phase 2 intrusive site investigation has been completed (assuming soakage test are undertaken at the same time), it will not be possible to determine whether the indicative proposed drainage solution is feasible or not.

SUDS discharging to groundwater should represent a relatively low risk as a pollution vector if serving only roof water runoff. However, the SUDS manual pollution index suggests that soakaways are likely to act as a vector for diffuse pollution (and accumulation in soils), if parking areas are directly connected to soakaway by means of conventional lined surface water drains without some form of pre-filtration, for example by means of a permeable surface.

In the absence of any other relevant or overriding comment from other consultees, I would recommend that the following condition be applied in order to ensure that the proposed means of disposal of surface water is appropriate to the site conditions.

(3) - Surface Water Drainage

Construction of the development shall not commence until details of the proposed means of surface water disposal have been submitted to, and approved in writing by, the Local Planning Authority. The approved details shall include a schedule of operational and preventative maintenance for surface water drainage structures as may be required for the proper operation of the system to its design flow rates. The system design shall account for the principles of water quality management (design principles, CIRIA C753), and shall avoid installation of infiltration drainage in ground adversely affected by contamination. Parties responsible for observing the maintenance plan shall be clearly identified within the plan, and the plan shall be implemented as approved.

Reason: *To ensure appropriate surface water management measures are implemented in order to mitigate any contribution to downstream surface water sewer flooding, and to prevent surface water systems acting as a vector for pollution or mobilising agent likely to driving significant migration of any contamination that may be found to be present on site. This condition is imposed having due regard to Havant Borough Local Plan (Core Strategy) 2011 policy DM10, DM17 of the Havant Borough Local Plan (Allocations) 2014, and the National Planning Policy Framework 2012.*

Mr. Jonathan Driver
Environmental Control Officer