

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/15/01396	Your Ref:	APP/15/00770
EH Case Officer Extn:	44 6677	Date:	05 October 2015
DC Case Officer:	Heather Lealan		
DC Case Officer Extn:	44 6523		
Application Number:	APP/15/00770		
Site Address:	E Block, Former BAE Systems, Elettra Avenue, Waterlooville, PO7 7XS		
Proposed Development:	Use of the E block building for leisure (class D2) and/or non food retail (class A1) purposes with associated car parking and other works. (OA Consent = APP/12/00652)		

Observations / Comments:

I am aware that our comments on this one have been very much delayed, so will try to keep these comments fairly brief. Comments here related to SUDS, Contamination & Air Quality only, and are largely in line with those provided previously for APP/15/00773.

SUDS

I agree with the assessment that ground conditions are unlikely to be suitable to support an extensive SUD solution capable of handling runoff from the entire site. I note that some SUDS features are proposed within the Western portion of the development (not covered by this application), in the form of swales. It is expected that some consideration is to be given to preventing this feature from representing a 'sink' for chronic inputs of automotive related pollutants to soils via parking surfaces runoff, e.g. through the use of suitable out-flow controls & provisions for inspection & maintenance.

Ground Contamination Assessments

I have had opportunity to review the ground contamination assessments for this wider development site, produced in 2008 & 2012 but not previously submitted in support of the pre-application discussions, outline or revised application(s).

The 2008 desk study report was comprehensive & informative, lending considerable confidence to the conclusions drawn within the later intrusive report. More detail is provided in my comments under the related application APP/15/00773. As a summary however, the 2012 intrusive works;

- did not identify any specific source of gross (e.g. bulk / liquid) contamination, or it's likely presence,

- did identify elevated determinands of uncertain origin, of potential significance to the local surface water (on site)
- did identify maximum CO₂ concentrations out of the normal range for the soil gas regime otherwise indicated by gas monitoring results, and in addition, depleted oxygen levels indicative of elevated chemical or biological consumption. These results are of uncertain significance, but could indicate an un-intercepted contamination source.

Both site access and coverage was limited at the time of the investigation, and additional sources could exist on uninvestigated areas of the site. It is considered that progressing the site under a formal watching brief is adequate to address these residual uncertainties.

It is recognised that the application in relation to E-Block relates to change of use class & ancillary re-arrangement of external space, most notably for highways & parking areas. Whilst no significant excavations are expected in connection with construction of superstructure (new foundations etc.), excavations related to drainage & highways are possible. Given that desk-based information identified a number of potential sources associated with E-Block (particularly S & E corners, and the NW facade), and notwithstanding the relatively un-intrusive nature of these proposals, it is nevertheless considered appropriate to include a condition to apply in the event that suspicious ground conditions are encountered during groundworks;

"In the event that soil or groundwater is encountered during groundwork that is suspected of being contaminated (including discolouration, oils, sheens that are oily, metallic or brightly coloured, foul or solvent odours, or deposits & inclusions comprising obvious waste materials), or if groundwork staff report acute symptoms (skin, eye or respiratory) suspected of being related to soil quality; works in affected areas of the site shall cease until a scheme to deal with the risks associated with the suspected contamination has been submitted to and approved in writing by the Local Planning Authority.

The scheme may comprise separate reports as appropriate, but unless specifically excluded in writing by the Local Planning Authority, shall include;

- 1) A site investigation in the vicinity of the suspected contamination, of a scale sufficient to characterise its nature, and likely origin, extent & mobility*
- 2) An appropriate assessment of the risks to all receptors that may be affected, including those off site.*
- 3) Where the Risk Assessment (2) identifies potentially unacceptable risks, a Remediation Strategy that includes;*
 - appropriately considered remedial objectives, and;*
 - clearly defined proposals for the remediation &/or mitigation of identified risks, having due regard to sustainability*
- 4) Where a remediation strategy (3) identifies actions required to remediate contamination or mitigate risks associated with the presence of contamination, a Verification Report that includes;*
 - Photographic documentation of any relevant physical works, sampling/monitoring results, and any other technical or statistical information as may be required to demonstrate that Remediation Strategy objectives have been met, and where necessary;*
 - Further plans for monitoring, provision for maintenance of barriers or other structures required for remediation or risk mitigation, and any relevant trigger values*

and contingency actions as may be required to address the identified risks (a "long-term monitoring and maintenance plan").

All assessments, works, monitoring & other actions required by (1)-(4) above shall be undertaken by competent persons, and the scheme 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); there is a low probability of the presence of Contamination associated with previous R&D activities at the site that could, if present, pose a significant risk to surface waters"

Air Quality

I have reviewed the revised Transportation & Junction Capacity assessments. These have been considered alongside the previous (whole site) Transport Assessment & consultation responses from both Highways & Parking services.

Comments made under APP/15/00773 are considered to apply to this plot, however, several additional points have been raised by Highways & Parking which warrant mention.

- Highways have highlighted the need for adequate crossing facilities to enable the free, efficient and safe movement of pedestrians between plots (across the wider site). I would agree this to be an important component of encouraging linked trips between businesses located on the developed site.
- Parking has raised the possibility of obstructive & unsafe parking practice by visitors or staff (on access roads). The likelihood of this is directly linked to parking allocation & management across the entire site, alongside the ease of movement between plots, on foot.

The parking accumulation calculation for E block has identified a need for 136 spaces (peak). The outline proposal includes provision for 157 spaces, of a 236 maximum provision under HCC parking standards. The TRICS report (on trip rate reductions achievable through mixed use developments) identifies over-provision of parking to represent a negative influence of achievable trip rate reductions (of mixed use scheme). For this reason, the appropriate consideration of needs is welcome, as is the proposal for a 33% reduction over maximum standards. It is assumed that this provision will form part of the approved detail.

The Highways service has touched on the need to facilitate pedestrian movements on site, but has not mentioned parking management. Similarly, Parking has touched upon the possibility of obstructive parking on unadopted access roads, but not addressed overall provision of spaces, nor their management.

In line with above, it would appear that the parking allocation has been carefully considered, and pitched at a level that meets need whilst not representing a conspicuous over-allocation (i.e. is acceptable as proposed).

The FTP provides a measure that aims to discourage staff from utilising customer parking, though it is not clear how this could be achieved. This is a worthwhile provision in principle, but could in itself encourage parking (customer space) management practices which limit customer freedom, and discourage linked trips between units.

It is considered that encouragement & facilitation of linked trips will in turn discourage & disincentivise vehicular circulation within the site, and assist in the reduction of overall trips generated by the site - with consequent marginal benefits to local air quality.

It is understood that 'a travel plan to include costed measures' will form part of the s106 agreement. I would expect management of parking to form a central element of that report, and in this way, this issue should be afforded due consideration at this stage. However, there is clearly a differing focus between consultees, and for this reason *I would welcome the opportunity to comment on the travel plans when submitted for approval.*

As previously stated (see response to APP/15/00773), whilst this development is expected to result in a (marginal) net negative impact in local emissions of road traffic pollutants, relevant receptors are non-proximal. It is consequently *considered unnecessary to undertake a specific air quality assessment.*

A handwritten signature in blue ink, appearing to read 'Jonathan Driver', with a horizontal line underneath.

Mr. Jonathan Driver
Environmental Control Officer