

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/15/01238	Your Ref:	APP/15/00686
EH Case Officer Extn:	44 6677	Date:	04 September 2015
DC Case Officer:	Heather Lealan		
DC Case Officer Extn:	44 6523		
Application Number:	APP/15/00686		
Site Address:	St Andrews House 59-61 West Street, Havant, PO9 1LB		
Proposed Development:	Discharge of Condition No's. 2,3,4,5,7,19 of Planning Permission APP/12/01233.		

Observations / Comments:

There has been a number of informal communications between Development Control, Portsmouth Water Company & Environmental Health over the past few days in respect of this application.

These comments are not intended as a challenge to Portsmouth Water's position (which has been reviewed, and is broadly supported); rather is intended to provide a consolidated & more formal comment - illustrating the rationale for-, and summarising-, previous comments provided informally. The sections below do not provide revised / additional comment, and do not change the position of 'no objection' previously indicated.

c2 - Drainage

It is recognised that this site is extremely sensitive with respect to controlled waters, being adjacent to several springs abstracted for potable public supply. In addition, there is some soil / groundwater contamination present at the site which has not yet been fully characterised / risk assessed, and associated remediation requirements are still to be finalised.

With specific regard to the discharge of c.2 (drainage details), the informal comments previously provided were based upon:

- Infiltration drainage not being proposed
- Interceptor being capable of attenuation of fuel spillage from RTC incident of foreseeable scale (60L, short term)
- Interceptor being appropriately sized, with an appreciable silt storage capacity (450L)
- An assumption that the drainage will be adequately sealed (as a construction quality issue), and that SW drainage will carry predominantly uncontaminated runoff (i.e. unlikely to represent a significant contaminant input to soils)
- Contamination risk assessment & remediation remaining an active requirement (under c.13), i.e. ground conditions should not pose unacceptable risk following redevelopment

- Regard for the Environment Agency response of 'no comment' with respect to contaminant pathway to surface water (separator performance, bypass operation, or if not appropriately maintained), and regard for the context of additional direct pathways (SW discharge) to the Lavant / Brockhampton stream within the locality
- An assumption that discharge rate issues (contribution to downstream flood risk) will be picked up through the discharge consent process.
- An assumption that the drainage system will be constructed with all due attention to quality - i.e. that it will be reasonably sealed & appropriately bedded in accordance with good building practice.
- Scope of condition being limited to "layout, depth & capacity..." and "details of any ancillary drainage works/plant" – not interpreted to implicitly include long term maintenance (though not specifically excluded)

It is recognised that the omission of SUDs is appropriate for this site, and that the surface water drainage solution is as low risk as can be hoped for whilst some of the site investigation & remediation remains outstanding. Risk based issues related to drainage & soil contamination will be picked up within the scope of c.13

Concern was expressed regarding maintenance provisions for the separator unit - failure to maintain the unit (i.e. empty the retention chambers prior to capacity being reached) would result in a direct pollutant pathway to the Brockhampton Stream. It is recognised that anticipated pollutant inputs from the site are low level chronic leakage from parked vehicles, where oil retention capacity should be maintained in the medium term (e.g. to protect against large volume accidental release), however detergent use within the parking area is not unlikely (could mobilise oils retained within the separator), and it is unclear how reaching sediment retention capacity would influence oil retention capacity.

Notwithstanding the above, it was not considered that there was sufficient concern over maintenance in order to recommend the refusal of discharge of condition 2, where the scheme design is entirely appropriate to the site, and the maintenance in perpetuity is not explicitly or implicitly included within it's scope. On this basis, despite the reservations regarding maintenance provisions, no objections were raised to discharge of condition 2.

c.18 - infiltration system design / justification

It was also indicated that (in the event that the current scheme submitted under c.2 is approved), there would be no objections to the discharge of c.18 on application. The scheme submitted under c.2 satisfies the requirement of c.18 to submit a surface water scheme for approval, and as no infiltration is proposed the additional elements (demonstrating the need for-, and mitigation of risks associated with- infiltration drainage) are not relevant.

c.5 - surfacing materials

Environmental Health did not request this condition, and as such the condition (whilst arguably being 'pollution relevant') does not have a pollution related policy justification. No comments were provided with respect to the schedule of materials largely for this reason.

I did review surfacing materials, and noted that the access road surface is (impermeable) macadam, parking area pavements specified are of a non-permeable type (reducing aggregate hydraulic conductivity), and typical section indicate a fall to road gully drainage (discharging via separator). It is recognised that loose-sand pavement jointing will be permeable, and does represent a possible pollutant pathway for chronic surface spillage (pollution), however, the majority of surface liquids / runoff is expected to be efficiently transferred to the drainage system.

It is not yet clear whether surfacing will be relevant to contamination / remediation. I expect the contamination assessment to appropriately account for the approved surfacing, and therefore do not consider there to be sufficient justification to refuse to approve discharge of condition 5 on the basis that the significance of infiltration (to the contamination assessment) is unconfirmed. It is assumed that subsequent amendment of the approved scheme (c.5 submission) remains possible if this is identified as a critical issue with respect to contamination risk.

In terms of pollution, some attenuation is likely to occur within sand jointing & paviour bedding, and surface spillages/leakages within parking spaces are likely small/chronic, are likely to be light(er than water) and consist of relatively insoluble material. The pathway is likely to exist, but (qualitatively) it's significance is considered likely to be low. Again, this risk should ideally be designed out, however I didn't feel there was sufficient justification to recommend refusal of this condition, considering that it's purpose was heritage / design / landscape.

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

Mr. Jonathan Driver
Environmental Control Officer