

HAVANT BOROUGH COUNCIL
Town & Country Planning Act 1990
Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	DCS/EH/JPD/140521001	Your Ref:	[As Application No.]
Ext. No:	6677	Date:	21/05/2014

DC Case Officer: David Eaves
Application Number: APP/14/00450
Site Address: Land at Harts Farm Way, Havant, PO9 1HS
Proposed Development: Installation of generator compound.

Observations / Comments:

These comments relate only to air quality / pollution and contamination issues. This consultation has also been passed to Les Glass for comments relating to noise & other environmental health related issues. A further response may be made by Les under separate cover if there are any significant concerns.

Summary

No adverse comments Re: Air Quality or Ground Contamination. One suggested condition regarding Pollution Preventions, required only in the event that the Environment Agency does not respond on the issue. Rationale below.

Ground Contamination / Land Quality Issues

Land use to the south of the proposed site is industrial in character, and the proposed use does not represent a sensitive receptor. The land at the former incinerator site has been the subject of a ground investigation targeting in particular PCB's, Dioxins & Furans, including land adjacent to the subject site. It was confirmed that the concentrations were not sufficiently high as to be of significant concern, and it is therefore unlikely that the application site is affected by significant contamination originating from the adjacent former land use.

The immediate vicinity of the site is not particularly sensitive (no European level, or national level designations), and the nearest watercourse is approximately 85m down-hydraulic gradient. The principle of bulk storage of liquid petroleum fuels (and the potential for spillage / leakage / contamination) is not therefore considered to be a material planning consideration. Storage arrangements (inclusive of containment requirements) are governed under the oil storage regulations, and any damage / pollution caused as a result of fuel storage would be addressed as appropriate either voluntarily or under the available acts / statutory instruments.

I see no justification to conclude that the proposed compound poses an unacceptably high pollution risk – however I do expect that the Environment Agency will wish to make comment regarding site surface water drainage / management. The nearest watercourse issues to Langstone Harbour which is the subject of multiple designations, inclusive of SSSI, RAMSAR, SPA & SAC, so pollution is of legitimate concern.

It is likely that the Agency will require surface water drainage to be passed through a high-storage-capacity forecourt type interceptor unit capable of containing the volume of one fuel storage tank (or fuel delivery container), i.e. approx. 10,000L, in order to mitigate the possibility of release of fuel into the environment following either localised spillage or catastrophic tank failure.

If no condition is proposed by the Agency in this regard, please include the suggested condition wording (below);

"Prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from the compound hardstanding shall be passed through a 'forecourt' class oil separator designed and constructed to have a capacity compatible with the fuel storage and refuelling arrangements implemented. Roof waters shall not pass through the separator".

Reason: To prevent pollution of the water environment and having due regard to policies CS15 and DM10 of the Havant Borough Core Strategy 2011 which form part of the Local Development Framework and Planning Policy Statements 9, 23 and 25.

If the Environment Agency requires such a condition, the wording proposed by the Agency should be used in place of that suggested above.

Air Quality

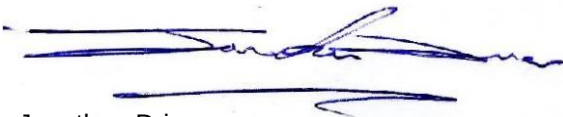
The intended intermittent operation of the site (at peak usage periods) is unlikely to give rise to emissions that are materially significant over an annualised basis, and whilst peak hourly emissions from the site might significantly affect concentrations in the vicinity of the compound, there are no nearby receptors relevant to local air quality management that might be affected.

The site is located within 15m of the A27 carriageway, which is a significant source of local atmospheric pollutants (associated with combustion), and a significant contributor to high background pollutant concentrations in this area.

In the context of the proximity to a consistent & significant contributor to general atmospheric pollution, the general lack of sensitive receptors in the vicinity, and the intermittent site operation - it is considered that the proposed generators are unlikely to significantly impact local air quality.

I therefore have no adverse comments.

Best Regards



Jonathan Driver
Environmental Control Officer