

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	DCS/EH/JPD/131024001	Your Ref:	[As Application Ref:]
Ext. No:	6677	Date:	22/10/2013

DC Case Officer: Heather Lealan
Application Number: APP/13/00548
Site Address: Portsmouth Golf Club, Crookhorn Lane, Waterlooville, PO7 5QL
Proposed Development: Engineering works to improve drainage, groundworks to remodel golf course and landscaping works to increase land levels. (Revised Application).

Observations / Comments:

I have looked over the application documents, consultation returns, responses & objections to this application.

It was not immediately obvious from the material submitted in support of the application that the importation of bulk fill material was being proposed in order to make up the proposed levels – indeed the Gaunt Golf Design Portsmouth Golf Club ‘design rationale’ refers to a cut & fill operation only.

Through ongoing discussions relating to the need for a CEMP, Parkwood Consultancy Services has confirmed proposals for the importation of just short of 160,000 cubic metres of fill material, representing just over 35,000 HGV movements over 16 months.

Comments from the Transport & Implementation team (relating to a possible condition to require a CEMP) refer to impacts on the highway and the ‘amenity of local residents’. I would agree that additional information is required in this regard.

With respect to Air Quality, despite the significant number of movements over the proposed period, a volume of 80 HGV movements per day would still represent <1% of the existing road traffic movements estimated at Crookhorn Lane. Whilst I do not have % HGV figures to hand for this location, the average for the Havant area around 3.7 %. LAQM assessment criteria refers to a proportion of >20% as requiring further consideration, and the EPUK planning for Air Quality guidance refers to a figure of >200 additional HGV movements per day associated with a large scale construction site (i.e. temporary/fixed period) before significant adverse air quality impacts might be expected, and should be assessed.

The additional HGV movements associated with this application are therefore considered unlikely to be of sufficient number as to be likely to create a significant adverse short-term local air quality impact, particularly in the context of the relatively good air quality within the locality. Noise, vibration, and timing of deliveries may however be significantly detrimental to the amenity of local residents, and should be considered appropriately as part of a construction site transport plan, or as part of a wider CEMP.

With respect to the imported material, the volumes proposed are not insignificant – indeed, it is noted that several of the objectors refer to this application description as a euphemism for a landfill operation.

Very little information is provided with respect to the anticipated source of material, and it seems unlikely to me that the proposals have been put forward without the consideration of options for materials sourcing.

It is similarly unclear whether the imported materials will be of a classification that could be described as 'product' (i.e. '*not waste*', for example certified sub-soils & top soils purchased from a soil processing facility), potentially exempt inert waste (e.g. excavated natural overburden from a mineral extraction operation – though my understanding is that volume limits apply to exemptions), or potentially licensable non-hazardous waste (e.g. waste soil arising from a Brownfield development site, construction & demolition wastes, dredging arisings, or similar).

My interest is ensure that the land could not qualify as contaminated land as a direct result of the deposited materials, and to ensure that regular users of the site are not exposed to contaminants or hazards within the fill material that could be detrimental to health.

It is not clear to me whether the proposed activity constitutes landfill operations, or whether an exemption might apply. It would be useful for the applicant to confirm the regulatory position in this regard – for example by confirming the nature of any exemptions, or any required environmental permits, and/or any requirement for county matters applications relating to minerals & waste activities.

In the event that an environmental permit is required to undertake this activity, the permit conditions are likely to adequately cover the issues of materials suitability, and appropriate storage, handling & deposition (etc.). However, in the event that an exemption applies, I consider that the applicant needs to clarify the source of materials (if known), any specific engineering or environmental requirements / parameters with respect to materials grading & deposition, and any proposed provisions for ensuring consistency with respect to the material grade & suitability. Provisions for confirming that imported materials are suitable for the proposed use both in terms of physical & chemical composition would also ideally be confirmed.

It is understood that the Transport & Implementation team has confirmed the need for a full CEMP to be submitted to the LPA for approval, as a pre-commencement condition. I would support this, and would add that I expect the CEMP to;

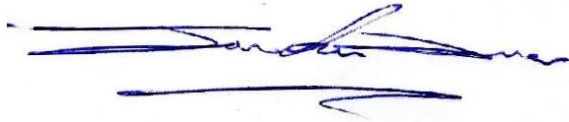
- identify HGV site access & egress points,
- seek to minimise the impact on the amenity of local residents
- consider storage / stockpiling / movement of materials,
- consider controls on working hours, noise & vibration associated with the works,
- consider mitigation of runoff & dust from storage areas, and the prevention of mud deposition on the highway.
- consider materials sourcing & volumes of materials, seeking to minimise importation (i.e. maximise useful volume from cut & fill operations), and outlining chain of custody controls and sampling / quality control for imported materials

It may be appropriate to propose suitable conditions in relation to some of the above aspects of the development, in particular prevention of excessive build-up of mud / spoil on the highway, hours of operation, timing of deliveries, quality of imported soils etc.

In the absence of clarity with respect to the volumes, material, and status of activities relating to the importation & laying of material to achieve the proposed levels, I would be minded to object to the approval of this application on the grounds that it is not clear whether implementation of the proposals is feasible within the regulatory context of waste management / Environmental permitting legislation.

Assuming that it can be demonstrated to be feasible, I have no objections in principle to the proposals; however it is possible that I might recommend specific conditions rather than rely upon the CEMP with respect to certain aspects, such as noise / dust / material quality.

Best Regards,

A handwritten signature in blue ink, appearing to read 'Jonathan Driver', with a long horizontal flourish extending to the right.

Jonathan Driver
Environmental Control Officer