

DELEGATED OFFICER REPORT

Application Ref: F/22/93703

Site Address: Hampshire Fire and Rescue Service Headquarters, Leigh Road,
Eastleigh, SO50 9SJ

Case Officer: David Huckfield

Description: Replacement modular building over two-storeys with associated car parking and fencing and removal of live fire training metal container units (revised scheme to planning permission F/20/88055).

Particular Site Constraints?	Yes ☒	No ☐
Within the Built-Up Area Boundary Designated Employment Site Within Flood Zone 1 Within Airport Safeguarding Zone Within Network Rail Consultation Zone		

Planning History?	Yes ☒	No ☐
Of most relevance to this application is planning permission F/20/88055 which granted permission for the <i>erection of a replacement office building with associated car parking and fencing and removal of live fire training metal container units</i>. This permission was issued on 08 February 2021 and remains extant. The current application is a revised scheme to that approval with the main difference between the proposals being the re-siting of the proposed office block 14m to the east relative to its previously approved position, as well as some minor elevational revisions and changes to the car parking layout. Prior to this, planning permission reference F/06/57121 was granted in August 2006. This gave permission for the existing training building (along with a training rig, vehicle storage building and an associated hardstanding) with the modular training building itself being subject to a time limiting condition (condition 8) which granted consent for a period of 10 years only. The reason given for this condition was on the grounds that the building was not considered suitable for permanent retention. This permission therefore technically expired in 2016, although the building (known as Wessex House) remains in situ. Also of relevance, is a concurrent planning application (Ref: F/22/93473) for the <i>demolition of the existing "Live Fire" training buildings and removal of the firefighting foam training pad on the site of the Hampshire & Isle of Wight Fire & Rescue Service Headquarters. Installation of new live fire training facilities and associated smoke filtration units. Construction of associated hardstanding and fencing to the perimeter</i>. This facility is proposed to be sited to the south-west of the office premises within the confines of the wider Hampshire Fire and Rescue site.		

Publicity:	Letters ☒	Site Notice ☐	Newspaper ☐
Representations	None		
Eastleigh Town Council	No comments received.		
Network Rail	Network Rail advised that they have no comments to make on the proposals.		
HCC Highways	In regard to application F/22/93703, there is no objection to the proposals from a highways perspective. Whilst 2 parking spaces appear to have been lost when compared to F/20/88055 (42 from 44 which the Case Officer may wish to review in line with the EBC being the Local Parking Authority), the layout is more usable with the 'blocked in' tandem spaces to the south having been removed.		

Tree Officer	The proposal does not differ significant, in an arboricultural perspective, from the previous permitted scheme. There are no significant trees within the red line or within influencing distance of it. The temporary parking places 15 to 21 appear to be on existing hard standing and so we have no objections. The case files contain an arboricultural report, but this is 5 years old and for another section of the site. We have not taken it into consideration during our decision-making process. We raise no arboricultural objection to the proposal.
Ecologist	Updated comments following the receipt of further information: The amenity grassland to the southeast corner of this site described in paragraph 4.20 is part of an area which will be enhanced for reptiles as part of the reptile mitigation and enhancement for application F/22/93473. Contractors for both applications will need to be kept informed of this situation by the site managers. This area will retain its mown edges so should not conflict with this development however, this proposal will encroach on the mown grassland. In section 5.8 on reptile protection measures it states that any reptiles found during the removal of temporary fencing would be carefully relocated to adjacent retained suitable habitat. Will an ecologist be on hand to supervise this procedure due to the risk of slow worms being present? If not, then very specific instructions about handling slow worms must be given in a toolbox talk to all operatives. If slow worms are under stress or are handled by the tail, it will detach from the body, leaving the animals open to infection and possible death. The planning update letter from Katherine Snell (November 2022) and the Proposed Drainage Layout by WML Consulting (P02, October 2022) explain the surface water drainage proposals which are satisfactory, as this is a replacement building. The loss of 120 m² of amenity grassland is small in terms of its proportion of the wider site, however it must be clear that existing vegetated areas must be preserved on this increasingly built-up and paved over site. Another area on the wider site can be used as mitigation for the loss of this amenity grass area. Biodiversity enhancements, as required by National Planning Policy, are required, and have not yet been proposed for this application. The planning update letter from Katherine Snell (November 2022) states that a green roof is not practical due to photo-voltaic panel installation. Green walls, bat and bird boxes can be considered. Otherwise, another part of the larger site can be enhanced, as recommended in my previous ecology response.
Southern Water	No objection. Southern Water advised that a formal application for connection to the public sewerage system is required in order to service this development. They also advised the applicant that a wastewater grease trap should be provided on the kitchen waste pipe or drain installed and maintained by the owner or operator of the premises and that land uses such as general hard standing that may be subject to oil/petrol spillages should be drained by means of appropriate oil trap gullies or petrol/oil interceptors.
Environmental Health	Regarding the neighbouring environment offsite, it is unlikely impact or harm may be caused.

	For the occupants of the modular building onsite which include a full-time staff, we ask how are they protected from fumes and exhaust from the fire training facility? Figure 7 of the Planning Statement shows a similar modular type of building with some air conditioner units outside. Presumably, to minimise the risk of harm to building occupants, windows would be sealed, and fresh air obtained from the least impacted side of the building and filtered? Could you please ask the applicant for clarification on these details? Further comments following receipt of updated information: The applicant takes on occupational health and safety by duty. There's no more for me therefore to add to this.
Southampton Airport	No objection. An informative is requested to be added to the decision notice in respect of the potential use of cranes during construction.

Site Visit:	Yes ☒	No ☐
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Policy:

The Development Plan:

Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.

The Development Plan comprises the policies of the Eastleigh Borough Local Plan 2016-2036 (adopted April 2022). Within the adopted Local Plan, the site falls within the urban edge and is designated as an employment zone. The relevant policies to the determination of this application are: S1 (Delivering Sustainable Development), S2 (Approach to New Development), S4 (Employment Provision), DM1 (General Criteria for New Development), DM2 (Environmentally Sustainable Development), DM3 (Adaptation to Climate Change), DM8 (Pollution), DM11 (Nature Conservation), DM13 (General Development Criteria – Transport), DM14 (Parking), DM15 (Safeguarding Existing Employment Sites).

Other material considerations:

Supplementary Planning Documents (SPDs) and Associated Planning Guidance

The following SPDs and Background Papers are of relevance to the proposals:

- Quality Places SPD
- Environmentally Sustainable Development
- Planning Obligations

National Planning Policy:

The Revised National Planning Policy Framework (the NPPF or Framework) was published in July 2021 and, as set out within paragraph 218, the policies contained within it are material considerations which should be taken into account in dealing with applications from the day of its publication. The Planning Practice Guidance provides additional guidance in support of the policies within the Framework and is also a material consideration in the determination of the application.

Assessment:

The development is considered acceptable and complies with the relevant policies of the adopted Local Plan in that:

- The site lies within the urban edge and forms part of a designated employment site within the Council's adopted Local Plan which is subject to the provisions of Policy DM15. This policy seeks to retain employment sites within employment uses providing that any development proposed is appropriate in highways and amenity terms. Whilst the existing use of the site does not strictly fall within the employment uses specified within this policy (being B2, B8 and E(g)(ii) / (iii)), it does serve an employment function and the proposed development would be ancillary to the principal use of the site which has, in recent years, expanded from just serving the Fire Service to also provide services and strategic headquarters for Hampshire Constabulary. Further, whilst the existing building which is proposed to be removed was subject to a now expired time limited consent, the present use of this particular part of the site is again ancillary to the principal use of the main premises. The general principle of further development for associated or ancillary purposes is therefore considered to be acceptable.
- In terms of the design of the proposed building, a modular two-storey structure has been proposed which is relatively similar in form and character to the present building to be removed (albeit with the new structure being larger in scale and footprint and thereby having a greater level of internal floorspace) and that which was previously approved. As with the previous approval, it is noted that modular buildings can become somewhat tired in appearance and condition over time and, therefore, are often only considered acceptable in planning terms on a temporary basis. In this particular case, however, it is understood that a modular structure is proposed to meet an urgent operational need for additional police accommodation on the site and, whilst perhaps a physically more robust and permanent building would be preferred, in this instance and taking account of the particularly limited visibility of the site from the surrounding public realm, on balance this is not considered to be unacceptable nor would it adversely affect the character of the area. It is also accepted that a similar structure could be built under planning approval F/20/88055 which remains extant.
- In light of the siting and scale of the development and the nature of the uses surrounding it which are predominantly commercial in nature with no immediate neighbouring residential uses, there are no concerns in respect of such matters as the potential for the building to be overbearing, result in a loss of light, privacy or outlook, or to be visually intrusive. In terms of hours of operation, again the siting of the premises and the nature of the use (which comprises predominantly office and ancillary laboratory space) would limit the potential for undue disturbance to occur.
- The Council's Environmental Health Officer (EHO) has raised the matter of the proximity of the office building to the live-fire training facility which is concurrently proposed at the same site (see planning history section above). This facility would be positioned to the south-west of the office premises and the EHO has questioned the potential for the occupiers of the offices to be unduly impacted by smoke arising from the live-fire training facility. The applicant has subsequently advised that they are fully aware of the proposal to relocate the fire training facility and that this was taken into account when designing the scheme. The new fire training facility will have improved smoke-extraction equipment relative to the existing facility and the office building will also be primarily mechanically ventilated so air makeup can be controlled. The applicant has therefore confirmed that, from their perspective, they do not envisage that the very limited occasional smoke release will have a detrimental effect on their building. Taking account of these factors, as well as that ultimately the applicant takes on responsibility for occupational health and safety as subsequently noted by the Council's EHO, the arrangement between the two uses is not considered to be unacceptable in this case.

- The access arrangements to the site will remain unchanged and these are considered to be suitable for the use proposed. Whilst the level of parking to be provided will be less than with the previous approval, there will only be a very modest reduction in spaces (42 as opposed to 44) and, as noted within the comments of the Highway Authority, the layout of the carpark area will be improved overall as a result of the revised layout and the removal of some of the previously proposed tandem parking. A suitable level of secure cycle parking will also be provided for the users of the development a condition will be imposed to require that these be provided.
- With regards to contaminated land, the site has most recently been utilised for training purposes by the fire service and presently houses smoke training containers, in addition to areas of hardstanding and the existing modular building which is to be removed. There is also vehicle storage in close proximity, with the land additionally being bordered by a railway line, as well as various neighbouring employment uses. Taking account of the former and current activities on the site and the adjacent land uses, therefore, the development is considered to have the potential to be affected by contaminants in the ground. In light of the pre-fabricated nature of the modular building proposed however, it is acknowledged as set out within the submitted information that there will be limited breaking of ground taking place with the existing slab to be reutilised. Taking account of this, it is not considered necessary for a full site investigation to be undertaken. A condition will however be imposed in respect of the possibility of the discovery of any unknown contamination to ensure that, should this be encountered, it is dealt with appropriately. This is consistent with the approach taken on the previous application.
- The proposals will not unduly impact upon trees on or adjacent to the site and no objection has been raised to the application by the Council's Tree Officer.
- In respect of Ecology, the application is supported by an Ecological Desk-Based Assessment which has been updated during the course of the application process following initial comments from the Council's Ecologist and to take account of the slow worms that were identified as being present elsewhere on the site as part of the concurrent application for the live-fire training facility (F/22/93473). The report concludes that no further survey work or assessments are required due to their being negligible likelihood for the site to support other protected or notable species, although it was acknowledged that there is a minor risk of accidental damage to adjacent reptile habitat and harm to reptiles. The report therefore sets out avoidance measures in this regard and a condition will be imposed to require compliance with these, with an informative to pick up the additional issues raised by the Council's Ecologist in respect of the risks of handling slow worms.

In terms of other ecological matters, the proposals do include the loss of a small area of amenity grassland which it is understood presently houses redundant pumping chamber. Whilst the comments of the Council's Ecologist are noted in this regard and, whilst likely to be limited to some degree in this case, all such vegetation has the potential to have at least some ecological value and its loss is therefore regrettable, there are no areas within the redline whereby it could be replaced and the area immediately adjacent to it will already be subject to enhancement as part of the concurrent proposal for the live-fire training facility as part of the reptile mitigation measures. A condition will be imposed however to require bat and/or bird boxes be installed on the building to provide some enhancements for ecology.

- With regards to drainage, surface water drainage is proposed to discharge to the existing surface water drainage network as with the current arrangement for the existing building, however a new interceptor will be installed in line with the comments of Southern Water to prevent pollution from run-off water. This is considered to be an acceptable arrangement in this case, with the use of

alternative drainage measures (e.g. soakaways) having been evaluated and found not to be practicable due to ground conditions. Taking account of these factors, it is not considered that the proposals will have any undue impact upon the European Protected Solent Complex with regards to affects on water quality or flows.

- The informatives requested by Southern Water and Southampton Airport will be added to the decision notice accordingly.

Climate Change:

In July 2019, the Council declared a Climate Change and Environmental Emergency. In doing so it agreed, among other things, to: (a) put in place measures to ensure the Council's own operations and functions achieve carbon neutrality by 2025; (b) work with partners to aim for all projects and services delivered in the Borough to achieve carbon neutrality by 2030; (c) ensure that the Council's procurement policy recognises carbon neutrality as one of its primary considerations; and (d) recognise the urgency of action to mitigate and adapt to climate change in every decision taken by the Council. This is underpinned by the Climate and Environment Emergency Strategy 2020–2030 and the supporting Climate and Environmental Emergency Action Plan – Update June 2020.

The declaration of the Climate Change and Environmental Emergency demonstrates a strong commitment from the Council to achieve net zero. The NPPF, development plan and adopted local plan policy do not set this as a specific target, but it is a material consideration to be considered alongside all other material considerations. In any case addressing climate change is a core part of the NPPF and local plan policy. The need to support the economy is part of the Strategic Environmental Assessment for the adopted local plan, as is an assessment of climate impacts.

The NPPF, Policies S1, DM2 and DM3 of the Local Plan and energy and water elements of the adopted Environmentally Sustainable Development SPD require development to be sustainable in terms of resource use, climate change and energy use. Specifically, Policy DM2 requires that development that is above 500sqm of floorspace measured externally must achieve BREEAM 'excellent' standard or BREEAM 'very good' plus 'passivhaus' certification including a 15% improvement in predicted carbon emissions compared with building regulations current at the time, through low or zero carbon energy generation on site or in a Borough location agreed by the Council.

As with the previous submission, this would not be achieved in this case. However, taking account of the constraints of the site, the modular nature of the construction and the need for this to be adaptable and flexible over its lifespan to respond to changes in operational requirements and, notably, the need for a structure of this type and nature to meet what is understood to be a pressing operational need for an essential public service (as set out within the submitted Planning Statement), this is considered acceptable in this particular instance.

A condition will be imposed however to require that the sustainability recommendations which are proposed as part of the submission are carried out as part of the development.

Equalities Implications:

Section 149 of the Equalities Act 2010 created the public sector equality duty. Section 149 states:-

A public authority must, in the exercise of its functions, have due regard to the need to:

- a. eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- b. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

- c. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

When making policy decisions, the Council must take account of the equality duty and in particular any potential impact on protected groups. It is considered that this application does not raise any equality implications.

Conclusion:

Recommendation:

PERMIT ☒

REFUSE ☐