

DELEGATED OFFICER REPORT

Application Ref: F/22/93473

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

Case Officer: David Huckfield

Description: 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.

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 ☐
There has been a range of planning applications for the Hampshire Fire and Rescue Service site incorporating the provision of various buildings, structures and facilities for purposes ancillary to their operations. The existing Hot Villa facility at the site's northern extent was approved in January 2009 (Ref. F/08/63971).		
Also of relevance to this scheme is a concurrent planning application for a <i>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)</i> . The office building proposed is to be situated to the north-west of the live-fire facility 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	Due to the close proximity of the proposed development to Network Rail's land and the operational railway, Network Rail requests the applicant / developer engages Network Rail's Asset Protection and Optimisation (ASPRO) team prior to works commencing. This will allow our ASPRO team to review the details of the proposal to ensure that the works can be completed without any risk to the operational railway. The applicant / developer may be required to enter into an Asset Protection Agreement to get the required resource and expertise on-board to enable approval of detailed works.		
HCC Highways	In regard to application F/22/93473, having reviewed the information contained within the application pack, there is no objection to the proposals from a highways perspective. The location and works proposed do not affect access in or out of site onto the highway and parking provision will be unaffected.		
Tree Officer	The green area that is due to be developed did contain a number of significant trees (see photograph 1, 2 and 5 in "existing photographs 2 of 3"). However, it appears to have been pre-emptively cleared (see photograph 6 in "existing photographs 2 of 3" and photograph 1 and 2 in "existing photographs 1 of 3"). The		

	arboricultural report appears to have been prepared post-clearance. It mentions a small area of scrub to be cleared, but the more significant trees are not listed. Ultimately, because these trees were not subject to a Tree Preservation Order, there is not much we can do. The Trees and Development SPD does mention consideration of pre-emptively removed trees, so we would like to see some replacements being provided on site. Therefore, we raise no arboricultural objection to the proposal, subject to conditions requiring that the development accords with the submitted arboricultural report and to require the submission of a tree planting plan and planting method statement.
Ecologist	Updated comments following the receipt of further information: I have reviewed the Reptile Mitigation Strategy Plan documents (overview, stages 1, 2 and 3, tree planting strategy plan and new LFF Reptile mitigation report) all by Ecosupport and revised in November 2022. The amendments and corrections have addressed my previous concerns. The retention of a small area of reptile-friendly rubble is a good addition. Due to the warmth generated by the live fire training once it is operational this area may be quite attractive to reptiles. Given the development pressure on this wider site, this area should be labelled with a sign that explains the purpose of this area, relevant information about slow worms and instructions not to handle reptiles if found but allow them to move away on their own. To avoid harm to reptiles, pallets for burning, rubbish and building materials must not be stored in this area. The email from Hampshire and Isle of Wight Fire and Rescue Service (4/11/22) confirms that only new OSB board and untreated new pallets are used for burning to minimise exposure to any contaminants. Conditions are recommended to require adherence with the submitted reptile mitigation strategy and the recommendations contained within it.
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. The developer can discharge surface water flow no greater than existing levels if proven to already be connected and it is ensured that there is no overall increase in flows into the surface water system. The developer will be required to provide a topographical site survey and/or a CCTV survey with the connection application showing the existing connection points, pipe sizes, gradients and calculations confirming the proposed surface water flow will be no greater than the existing contributing flows. 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. Conditions are recommended to require that the applicant ensures that a Trade Effluent discharge licence is obtained before connection to the sewerage network can be approved and in respect of drainage provisions for the site.
Environmental Health	Air Quality - an assessment of impact of emissions from a filtration system and stack attached to the fire training facility is presented by the applicant and this predicts low impact to dwellings in the neighbourhood, which if achieved is acceptable. For example, one hour nitrogen dioxide (NO₂) is less than ten per cent of proportion of ambient levels during fire training,

particulate matter of ten or less microns in diameter (PM10) are ten per cent of daily Air Quality Objectives and carbon monoxide over a rolling eight period is less than ten per cent of Air Quality Objectives. The impact significance of these is 'negligible' which is agreeable to us.

It is understood the calculations of dispersion adopt the worst case of several meteorological conditions from observations at the airport monitoring station approximately 3km distant and there is assumption based upon information on the effectiveness or performance of the filtration system ("Minerva process") and stack and discharge quantities including exhaust gas temperature and velocity and the applicant's stated use and quantity of combustible matter (flammable boards placed inside the training facility that when ignited create smoke for carbonaceous simulation). The exhaust gas temperature is 30C only and we suppose fans improve dispersion to some 22 m/s efflux velocity.

It is preferable for there to be verification of the stack emissions to demonstrate the effectiveness of the filtration system and assumptions on the pollution emission input to this during a training cycle prior to coming into use. Presumably, this can be done for testing and commission and reported to the Local Planning Authority?

Noise Impact - we are not appraised of noise emissions, and these are commonly a neighbourhood concern. Presumably, there is existing consent for fire training and like air quality would be assessed if there is a change in these? For clarity, please ask the application for information including noise control of fans or other mechanical equipment or plant.

Artificial Lighting – the facility will be lit by bright luminaires, and these are shown amongst the application documents to be confined to within the training facility itself with no lighting stray. This is agreeable to use if a condition is included in the consent for compliance in the neighbourhood and a luminaire colour temperature of not more 4000K is used.

Construction Environmental Management – please include a condition requiring a proportionate plan to be approved by the Local Planning Authority prior to commencement of demolition works onsite and thereafter construction and installation of the new facility.

Further comments in the context of the concurrent application for the police office premises at the site:

The air quality assessment is requested to be updated to include NOx and prior to going ahead with the dispersion modelling, ask the applicant to provide chemical concentrations of gas from similar facility and flue gas treatment / capture. The effectiveness of this depends on scrubbing and or destruction temperature. Health impact limits are available to compare the gas concentrations for risk. Currently, we are concerned for the offices / new block to be located close to pollution.

Subsequent comment following receipt of further 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), DM6 (Sustainable Surface Water Management and Watercourse Management), DM8 (Pollution), DM11 (Nature Conservation), DM13 (General Development Criteria – Transport), DM14 (Parking), DM15 (Safeguarding Existing Employment Sites), DM16 (Workforce Training Requirements and New Jobs).

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

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 Saved Policies DM15 and DM16. These policies seek to retain existing employment sites in employment use in order to retain a diverse choice of employment opportunities, to enable industries already established on these sites to grow, and to minimise the need to allocate further greenfield sites for employment use. They also allow for development for workforce training opportunities on employment sites where they are related to the existing use on the site and contribute to improving workforce skills for the Borough.

Whilst the existing use of the site does not fall within the employment uses which form the focus of policy DM15 (being B2, B8 and E(g)(ii) / (iii)), it does serve an employment function and the proposals are for purposes which are ancillary to the principle use of the site as the Headquarters for Hampshire Fire Services and would form part of the training operations that are already provided as part of their wider offering and which are allowed for under policy DM16. It is also noted that a similar facility has existed for a number of years on the site and that this would be replaced by the new Hot Villa and associated structures. The general principle of the development is therefore considered to be acceptable, with any planning approval being subject to the exact nature, design, layout and impacts of the proposals being considered to be appropriate and in compliance with the relevant local and national planning policy requirements. These matters are covered below.

- In terms of the design of the proposals, it is accepted that form very much follows function in respect of the form and appearance of the structures and, given the nature of the site and the operations that are presently carried out within it, they would not necessarily appear visually out of place alongside the range of existing buildings, structures and equipment which is currently in situ. Given the largely self-contained nature of this area of the site and the screening that would be afforded to adjacent land or uses by the mature perimeter tree line along the northern and western boundaries of the site, it is also considered that the development would have a relatively limited impact upon the character of its wider surroundings.
- The access arrangements to the site will remain unchanged and these are considered to be suitable for the use proposed. There is also not anticipated to be any notable impact with regards to traffic movements as the footfall and vehicular movements associated with the proposed facility attend the site already. Parking provision, which is provided within the wider Hampshire Fire and Rescue site will also remain unaffected and no objections to the application have been raised by the Highway Authority.
- In terms of the amenity impacts of the proposals, 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 particular concerns raised in respect of such matters as the potential for the buildings or structures to be overbearing, result in a loss of light, privacy or outlook, or to be visually intrusive for residential occupiers. In terms of hours of operation, again the siting of the premises and the nature of the use (which is substantively similar to training activities that already occur on site) will limit the potential for undue disturbance to occur. Noise levels generated are also not anticipated to be greater than for the existing facility. With regards to the construction phase, whilst the comments of the Council's Environmental Health Officer are noted, it is not considered necessary for a full Construction Management Plan to be provided in this case given the extent of the site, the relatively limited construction period and the distance to any residential properties.
- With regards to air quality, the Council's Environmental Health Officer (EHO) has raised the matter of smoke generation potentially arising from the proposed facility. This is in terms of its proximity to the office building which is concurrently proposed at the same site (see planning history section above) and the potential to impact upon its users. The applicant has advised that the office building was not considered in the assessment as a sensitive human receptor as offices are not a location of relevant exposure and therefore the air quality objectives do not apply, with offices being considered under separate Health and Safety legislation. Notwithstanding this, the assessment concludes that the overall impacts on air quality were not significant. The applicant for the office premises has also advised that they are fully aware of the proposal to relocate the fire training facility and that this was taken into account when designing their 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. From their perspective therefore, the applicant for the office premises has confirmed that they do not envisage that the very limited occasional smoke release will have a detrimental effect on their building. Taking account of these factors, that both buildings are on the same site as part of a collaborative shared service between the fire service and police, as well as that ultimately the applicant takes on responsibility for occupational health and safety in both cases as subsequently noted by the Council's EHO, the arrangement between the two uses is not considered to be unacceptable in this case.

In terms of air quality implications more generally, as noted above the submitted air quality assessment predicts that the impact significance of the proposals is negligible in the context of Air Quality Objectives, which has been accepted by the Council's EHO. In terms of the request for verification of stack emissions and the effectiveness of the filtration system during a training exercise prior to the facility being brought into use (these have been modelled within the assessment on the basis of the relevant abatement plant specification and international research on pollutant releases to give representative anticipated emissions), it is not considered that this would be reasonable in this case. Such a requirement would necessitate the installation of the equipment and its testing in situ before its usage as part of the development has been approved. Should the equipment not perform as anticipated and result in future issues such as to cause a nuisance, there are separate legislative powers available under which the Council can investigate this. Notwithstanding this, the equipment is likely to represent a notable improvement to that used within the existing facility which has operated from the site for a number of years.

- In respect of Ecology, during the course of the application, the presence of a low population of slow worms was identified on site within the area where the proposed facility would be constructed. A Reptile Survey and Mitigation Strategy was subsequently submitted following discussions between the applicant and the Council's Ecologist. The Mitigation Strategy proposes that the reptiles will be kept on site and moved to a strip of vegetation along the western perimeter of the site which is deemed suitable for this purpose. This area will be enhanced with the creation of a wood-based hibernaculum to provide reptiles with a suitable area to hibernate within and thereafter be subject to appropriate management measures and works. A further area (denoted as 'Area 2 – Stage 3' on the submitted Reptile Mitigation Strategy Plan), is to be enhanced to offset the habitat loss as a result of the proposed development, with these enhancements including wildflower planting, tree planting, as well as the provision of hibernaculum and an insect hotel. These measures are deemed acceptable and conditions will be imposed to secure them.
- With regards to trees, the Tree Report which accompanies the application sets out that the only tree removal proposed is a category 'C' group of small low-quality regeneration and scrub. The Council's Tree Officer has however raised the matter of the pre-emptive tree removal which potentially took place prior to the survey being carried out and has requested additional planting to mitigate for this. Whilst these trees weren't protected and therefore consent was not required for their removal, nonetheless it is considered that it would not be unreasonable to seek at least some additional tree planting and, as noted above, planting is proposed as part of the enhancements to Area 2 and this will be secured by condition. A further condition will be added in respect of tree protection measures as recommended by the Council's Tree Officer.
- In terms of drainage, the proposed development is a replacement facility and, as per the current arrangements, will utilise the existing surface water sewerage network. Southern Water have confirmed this is acceptable if there is no overall increase in flows into the system. The developer will be required to make a formal application to Southern Water to discharge to the sewer network which will incorporate the provision of the information detailed in Southern Water's

consultation response on the application, including confirming existing connection points. In terms of Southern Water's request for a condition to ensure that the applicant obtains a trade effluent licence before connecting to the public sewer network, the licensing regime is covered under legislative provisions which fall outside of the planning process. Such a condition is therefore considered neither necessary nor reasonable. An informative will however be added to the decision notice to bring the requirement for a trade effluent licence to the attention of the applicant.

- The informative requested by Southampton Airport in respect of the use of cranes will be added to the decision notice accordingly, along with a further informative to highlight the asset protection measures referenced by Network Rail.

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. The Design and Access Statement (section 5.0) submitted in support of the application sets out that as the proposed facility is not a habitable building or place of work and the indoor climate is not managed by any mechanical or electrical system, BREEAM targets are not applicable. Notwithstanding this, the proposals include some energy efficient measures such as a demand-controlled smoke extraction strategy, openable steel window shutters to naturally cool spaces, and energy efficient lighting with LED luminaires and control system. The proposals will therefore represent a notably more efficient facility than the existing structure that is to be removed and replaced and overall and taking account of the nature of the development, the proposals are considered to be acceptable in this regard.

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 ☐