

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/23/00177	Your Ref:	APP/22/01207
EH Case Officer Extn:	44 6677	Date:	31 March 2023
DC Case Officer:	David Eaves		
DC Case Officer Extn:	44 6549		
Application Number:	APP/22/01207		
Site Address:	Land Rear of 70-76 West Street, Havant, PO9 1LN		
Proposed Development:	Application for Approval of Reserved Matters (Landscaping and Layout) pursuant to Outline Planning Permission ref. APP/19/00542 for backland development of 4 No. One bedroom cottages		

Observations / Comments:

Condition 7 – Construction Management Plan

It is noted that the plan contains references to the presence of water distribution/spraying/cleaning equipment, but does not specifically make any provision for ensuring that a water source of sufficient capacity (either on-site/piped, or located offsite for filling of the site-water bowser) will be maintained throughout the period of works.

Similarly, I note that the section addressing the prevention of mud trackout refers to a sludge pump to clear silt, but it does not address the disposal route for pumped water e.g. to a settlement tank/barrels etc.). This is fairly important in this area, as local surface-water drains discharge to the Brockhampton Stream within 120m of the site entrance.

As my colleague highlights, CMP's are live documents and are expected to evolve as the project progresses. I trust that these comments will be sufficient to highlight the expectation that an adequate water supply will be available throughout works, and that sludge disposal (and for similar reasons, site runoff at the northern boundary) will be expected to avoid pollution of the local surface water with suspended solids. I would anticipate these comments being accounted for in the next iteration of the CMP, which I expect to be drafted following selection of the principal contractor.

No in-principle objections arise.

Condition 8 – Contamination

I note that section 4 of the report makes assumptions about the direction of runoff from the site. Whilst the site is generally level, stockpiles of material can create gradients which differ from those that exist at the undeveloped site, and LIDAR indicates that the northern portion of the site does fall toward the Brockhampton Stream. It is expected that works within 8m of the Brockhampton channel will require an Environmental Permit from the Environment Agency, I would expect this process to reinforce the need to manage this risk.

I would also highlight that whilst section 10 somewhat down-plays the risks to water receptors, and emphasises human health risk, the site does lie within an SPZ1 for the protection of the public potable groundwater supply, and has two local surfacewaters within a short distance of the site boundary. Because risk-screening criteria are typically far more stringent for water receptors than for human health, water receptors could represent a significant-, and possibly the predominant-, risk driver for the site.

Given this, I would recommend that the proposal to sample groundwater for dissolved and/or suspended contamination using the same analytical suite *if present* be upgraded, so as the design of the phase 2 intrusive investigation seeks to establish the depth to groundwater and to sample it.

Otherwise, the conclusions of the report are broadly agreed. Given the condition wording, it is *recommended that the part discharge applies to part 1) only*, and that *the Grampian clause should remain in force until the LPA is able to discharge both parts 2) & 3) of condition 8*.

Mr. Jonathan Driver
Environmental Control Officer