

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From: Environmental Health **To:** Development Control

Our Ref: CONS/20/00002 **Your Ref:** APP/19/01190

EH Case Officer Extn: 44 6677 **Date:** 21 January 2020

DC Case Officer: Ms Lesley Wells

DC Case Officer Extn: 4 223

Application Number: APP/19/01190

Site Address: 162 Stakes Hill Road, Waterlooville, PO7 7BS

Proposed Development: Erection of a 2 1/2 storey block of 9 apartments after demolition of existing dwelling, utilising existing access and with provision of car and cycle parking and bin storage.

I attach a copy of the above application that has been received under the Town and Country Planning Acts.

Any views you should wish to make should be returned to me no later than 23/01/2020.

Observations / Comments:

I have reviewed the application with particular interest on environmental issues of air quality, pollution (of land, water & groundwater) and ground contamination. Environmental Health may make comment under separate cover in respect of 'amenity and nuisance' issues (light pollution or noise exposure, etc.).

Contamination / Contaminated Land

This site appears to have been brownfield site from prior to 1867, and the 'original' buildings were likely redeveloped prior to 1898. It is not entirely clear from the available records, but it appears likely that the original (known) site use was residential, though several outbuildings and structures have been variously present at the site throughout its history.

It appears likely from the planning record that the 1897 structure remains present at the site, albeit in altered form (dormer & chimney alterations).

Some contamination risks arise at the site from the likely presence of construction & demolition wastes associated with the development history of the site, as well as residuals from domestic combustion (e.g. coal storage & use, and ash disposal - the existing dwelling depicted in the 1957 planning application benefited from 4 no chimneys).

Asbestos may be present within the building fabric, particularly in associated with the additions and outbuildings constructed after 1950. Asbestos fibres / fragments of asbestos containing building materials may be present in soils in association with construction & demolition of outbuildings.

A large glasshouse is (or has formerly been) associated with the property, and this represents an elevated risk from kerosene or similar oil heating (and the storage, transfer and handling of fuel).

The scheme represents a relatively low exposure risk, including amenity planting only. Asbestos within the structure of the building is regarded as a construction health & safety risk, and is not strictly relevant to the planning process. Asbestos within soils is material to the use of the land, albeit that it is recognised that the risk profile of the site will, if anything, improve following development. Asbestos is fairly ubiquitous as a contaminant, but that does not mean that we may be complacent about its presence. Coal / ash could in principle be elevated above human health guideline values, but I suspect that a domestic source (e.g. from coal storage) is unlikely to be of sufficient scale to make an 'unacceptable risk' to future occupants 'likely'. These contaminants are readily identifiable by visual means (ashy deposits / clinker, black staining or residues, fragments of asbestos containing cement or insulation board etc.).

In the interests of recognising the risk, whilst maintaining a reasonable degree of proportionality, I am minded to address the issue of contamination by means of a conditional 'duty to observe for- and appropriately manage-, any contaminated materials encountered during groundworks'. Suggested wording below:

Unexpected Contamination

"In the event that suspected contamination is encountered during groundwork (e.g. obviously contaminated soil / groundwater, or any buried waste materials not assuredly comprising non-harmful construction materials); works in affected areas of the site shall cease until the Local Planning Authority has been notified of the discovery, and a scheme to deal with the risks associated with the suspected contamination has been submitted to- and approved in writing by- the Local Planning Authority.

The scheme may take a proportionate approach to the degree of formality adopted, and may comprise separate results / reports / statements as appropriate, but unless specifically excluded by agreement shall include;

- 1) Reasonable investigation in the vicinity of suspected contamination, sufficient to characterise its nature, likely extent & mobility,*
- 2) An appropriate assessment of the risks to all receptors that may be affected, based upon 1), and;*
- 3) Where potentially unacceptable risks are identified by 2), a Remediation Strategy that includes appropriately considered remedial objectives and clearly defined proposals for achieving these, having due regard to sustainability*

All investigation, assessments & other actions required by 1)-3) above (and B, below) shall be undertaken by competent persons, and the findings presented as written report. The scheme shall be implemented as approved.

Prior to the occupation of any relevant part of the permitted development, EITHER of the following shall be submitted to the Local Planning Authority;

- A. A statement confirming that no suspected contamination was identified during development, OR;*
- B. Documentation in accordance with 1)-3) above; together with a Verification Report (where appropriate) demonstrating that remediation objectives have been met.*

Reason: *Having due regard to policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011, DM17 of the Havant Borough Local Plan (Allocations) [2014] and the National Planning Policy Framework, there is a potential for contamination to exist at the site in connection with prior development activity which could pose a risk to site groundworks staff, and future occupants"*

Drainage / SuDS (Pollution)

I have no comments to make on the proposed strategy or pollution risk

Air Quality

I note that the proposal seeks to retain the current mature hedging, and that whilst the

proposed dwellings will be positioned much closer to the curtilage, there remains a significant buffer distance from the principle transport route.

Air quality is measured in the wider vicinity, and is not thought to indicate a significant exposure risk is likely at this location.

Transport / Access / Parking (Air Quality)

I agree that the increased trip demand represented by the site is negligible, considered in isolation. The Stakes Hill Road / Stakes Road / Crookhorn Lane / Purbrook Way junction is known to be likely to be operating above its designed capacity within the foreseeable future, and that committed and proposed developments will place this junction under further pressure.

Modifications to the junction are planned &/or proposed under other schemes - but obviously any other schemes in the vicinity will contribute to pressure on this junction. It is a planning decision as to whether it is reasonable / appropriate to require a proportionate contribution to the local infrastructure necessary to support development in the Purbrook & Waterloo area, or whether it is acceptable for small developments to rely upon the contributions of larger developments to ensure that sufficient capacity exists in local transport networks & in other local facilities. I make no specific recommendation, and do not object to the provision of SPD compliant vehicle parking on air quality grounds.

As regards cycle parking - I note that the provision is conveniently located, and will be both secure and weather-tight, maximising the likelihood of residents choosing cycling for at least some of their local journeys. This is viewed as a positive feature from an air quality perspective (assisting in avoiding transport emissions).

I note that the development is too small for emerging policy E23 (offsetting) to apply. I therefore have no comments to make on the sustainability credentials of the scheme. No objections are raised on air quality grounds.

Best Regards,

Mr. Jonathan Driver
Environmental Control Officer