

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/17/00475	Your Ref:	APP/17/00184
EH Case Officer Extn:	44 6677	Date:	17 March 2017
DC Case Officer:	Daphney Haywood		
DC Case Officer Extn:	44 6513		
Application Number:	APP/17/00184		
Site Address:	Site of Former Raebarn House Car Park, Curzon Road, Waterlooville		
Proposed Development:	Proposed change of use of first floor retail area to form 9No. self contained 1bedroom flats.		

Observations / Comments:

I have reviewed the relatively limited documentation submitted in support of this application, alongside the planning history in relation to similar developments within Raebarn House. I would likely to provide some comments with respect to contamination, air quality and noise.

Contamination

The development history for Raebarn House was considered under APP/11/00343. The comments below essentially simply re-state the current assessment of probable risk associated with the site, in general and in the context of these latest proposals;

- The historic use of the site is unclear, with several buildings / structures / boundaries in place at various dates, apparently associated with residential property at #324/326 London Road. Early 1900's Workshop / Commercial Use to the rear (East side of Curzon Road) cannot be ruled out, though map annotation does not identify a specific commercial use. It would appear that the land to the rear of 326 may also have been developed into commercial units sometime before 1953 (East side of Raebarn House footprint) alongside an additional probable commercial / industrial building within the carriageway of Curzon Road, located to the rear (East) of the former buildings at 320-324 London Road.
- The commercial use of the structures variously present at the site throughout the history represents a potential for elevated concentrations of contaminants to be present within soils at the site, albeit that no high risk uses have been specifically identified at this stage. As no commercial function is specifically identified on mapping, it can be concluded that the scale of activity was likely to be modest, and not likely to pose a high risk of presence of substantial persistent contamination (engineering / forging / milling / textiles / manufacture / warehousing / depot activities / garage services etc. tend to be marked on mapping).

- The proposed form of development represents a low risk, placing accommodation at first floor, and omitting any soft landscaping etc. at ground floor. It is therefore considered reasonable to conclude that the risk to future residents is likely to be negligible.

Whilst an investigation may have been required to address uncertainties for comprehensive redevelopment of this site to a contamination-sensitive residential scheme (such as houses with private gardens), the proposed scheme is inherently low risk and does not involve any significant groundwork. As such it is not considered necessary for the applicant to consider contamination risks further.

Air Quality

The latest estimates indicate that the A3 Maurepas Way / London Road / B2150 Hulbert Road junction carries something of the order of 48000 vehicles daily (AADT), with the busiest junction arm represented by the B2150 Hulbert Road, linking the Waterlooville with the National Trunk Road Network (A3(M)).

Indicative air pollution monitoring (Nitrogen Dioxide, NO₂) is undertaken at the west side of this junction, adjacent to the Maurepas Way approach. Bias factors are not yet available for 2016, but raw monitoring indicates a roadside concentration of 42.25 ug/m³, representing an exceedance of the annual average Local Air Quality Management NO₂ objective (40 ug/m³). Given the four storey height of Raebarn House (reducing dispersion & dilution), the additional traffic carried by the B2150 arm, and the inclined approach to the junction, it is reasonable to conclude that the Maurepas Way measurement is at best representative of air pollution on Hulbert Road, and that it is certainly plausible that air pollution at the (South) roadside of Hulbert Road could be elevated relative to the Maurepas Way measurement point.

The facade of Raebarn House is set back from the Kerbside by only 7m, where limited air volume is present between the source & receptor to facilitate effective pollutant dispersion/dilution. Future occupants of properties taking ventilation air from this facade would be at risk of unacceptable exposure to poor air quality, especially where ventilation air is taken from the lower floors.

It is considered that the risk is sufficient that mitigation should be required in order to ensure long-term protection for future occupants. The most practical means of achieving protection for future residents is to implement a scheme of mechanical (MEV/MVHR) or passive ducted ventilation (passive stack) to provide sufficient air exchange as to meet or exceed building control requirements with all windows closed. Air should be drawn from roof level, or a position on the building facade which is at least 15m linear from the kerb of the B2150 Hulbert Road, measured in plan view (not accounting for elevation).

With reference to the proposed floor plans, it is considered that this protection is necessary for units marked 4, 5, 8 & 9 on drawing Ref W16-030 101 Dated Feb 17 (North Facade, and Northern end of West Facade). Permitting this development without adequate protection risks the creation of a breach of statutory air quality standards, which would require remedial action to be undertaken by the Council. Appropriate planning controls can avoid unnecessary permitting unacceptable exposure to poor air quality, in line with policy DM10.

I have no objection to the proposals *subject to the inclusion of a suitable condition to secure appropriate mitigation of exposure to poor air quality for the residents of unit numbered above*. In the event that you are minded to grant consent for this scheme, please contact me to discuss appropriate condition wording.

Noise

The northern facade of Raebarn House is also subject to significant noise from road traffic, exacerbated by the inclined approach to the Hulbert Rd. / Maurepas Way / London Road junction (increased power requirement in slow moving traffic), and the route representing a principal commuter route with direct access to the A3(M) just 1.2m to the East.

Previous residential conversion within Raebarn House has incorporated substantial noise mitigation to reduce the impact upon residents. I anticipate that Laurent will provide detailed comment on technical aspects such as glazing specifications (etc.), I raise this issue here as the proposed mitigation of exposure to air pollution / poor air quality (e.g. MEV or MVHR fresh-air ventilation system), if specified with duct silencers would also serve to substantially mitigate against noise impact by facilitating adequate ventilation without the need to open windows.

I would however highlight that problems have arisen with residential units of previous developments within this building, where openable window casements were not provided, and MVHR units were installed within non-accessible void spaces. This has resulted in the failure of units to operate effectively (due to inaccessibility for maintenance, or a lack of clarity on how these units are powered, controlled and operated), leading to overheating of the flats and several housing complaints.

For this reason, it is recommended that each flat be provided with at least one openable window. If MEV/MVHR units are specified, it is acceptable for to be installed within a service void, however it is recommended that i) the unit is permanently accessible for maintenance purposes (e.g. behind openable service hatch or removable panel), ii) that controls be clearly identified, and iii) that the unit be supplied by a clearly labelled & separately fused circuit or by a clearly marked fused spur with a wall plate located in an accessible place.

Mr. Jonathan Driver
Environmental Control Officer