

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/21/03072	Your Ref:	APP/18/00897
EH Case Officer Extn:	44 6677	Date:	23 September 2021
DC Case Officer:	Paige Harvey		
DC Case Officer Extn:			
Application Number:	APP/18/00897		
Site Address:	15 Langstone Road, Havant, PO9 1RA		
Proposed Development:	The demolition of an existing dwelling and construction of 9No. 2 bedroom flats; including associated access, landscaping and parking. (Approved 07/12/2018). Request to discharge condition No/s 3 (Levels), 6 (Hardstanding), 7 (CMP) and 11 (Materials) (26/07/2021).		

Observations / Comments:

I note that Environmental Health was not consulted on the 2018 application for consent, and did not request that a condition be imposed to require a CEMP. It appears that this condition arose from comments submitted from by the Highways Authority.

I have briefly reviewed the submitted CEMP / CEMP Plan, on the basis that the reason given for imposition of condition 7 includes reference to the protection of amenity in accordance with policy DM10. I would highlight however that the wording of c.7 does not actually require that provisions contained within the CEMP be adhered to throughout the demolition & construction activity where those provisions are not related specifically to either parking provision, the wheel washing facility or the materials storage compound.

It is not clear to me that any provisions relating to other matters would be enforceable as a planning matter irrespective of the wording used within the CEMP, unless it would be sufficient to demonstrate that development was not proceeding in accordance with the/an approved document (i.e. the CEMP).

I also note that c.7 requires the CEMP provide information on 4 specific subject areas, numbered i) – iv).

Provision i) relates to the provision of contractor parking within the curtilage of the site. In this respect, the CEMP confirms that no provision will be made, noting that *'parking in the local area is restricted. There are roads in the vicinity for contractors to park'*. It is unclear whether the intention of c.7 i) was intended to prevent overspill of contractor parking to local roads – and on this basis it is unclear that this proposal is acceptable. As a matter not related to the enforcement remit of Environmental Health, I will defer to the Highways Authority to raise any material objection that may be appropriate.

It would appear that the CEMP provides adequate description of measures in respect of c.7 items ii)-iv), and the CEMP plan indicates the position of the materials storage & deliveries reception & collection (set down) area. No objections arise.

Dust provisions appear to be appropriate and proportionate for a small site, and I welcome the commitments to;

- limiting the hours of noisy activities (page 12)
- erecting solid hoarding to the site (page 6, page 9)
- directing all security & task lighting away from neighbouring properties (page 6)
- appropriate provisions for preventing & remedying any mud track-out & dust from loads being transported
- prohibiting burning of any materials
- undertaking surveys for rodents, and implementing control measures (page 13)

No specific objections or significant material comments arise, other than to highlight the slightly ambiguous provisions for providing a water supply & appropriate drainage prior to the commencement of works. This is acknowledged to be largely driven by uncertainty associated with actions required to be taken by statutory undertakers, but the plan could have been more expansive / clearer on the contingency plan. A lack of adequate water supply would represent a significant risk factor for dust emissions, and a lack of appropriate drainage in wash-down areas would represent a risk factor for mud track out (or runoff across site boundary, to highway or otherwise).

On balance, given the specific provisions of c.7, the scale of the site/quantum of development, and the other CEMP content – it is not considered that the ambiguity about service provision would sustain an objection to the discharge of c.7.

On this basis, I raise no objection on nuisance / amenity grounds to the discharge of c.7.

Mr. Jonathan Driver
Environmental Control Officer