

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/16/01146	Your Ref:	APP/16/00776
EH Case Officer Extn:	44 6677	Date:	12 August 2016
DC Case Officer:	Heather Lealan		
DC Case Officer Extn:	44 6523		
Application Number:	APP/16/00776		
Site Address:	Premier Sheet Metal Co, Brockhampton Road, Havant, PO9 1JU		
Proposed Development:	Change of use from B1 to B2 with MOT use.		

Observations / Comments:

I have reviewed the application from an environmental standpoint. It would appear to me that the noise generation potential, and the potential for pollution / contamination to occur as a result of the operation of the site under a B2 usage will be broadly equivalent to it's operation as a B1 unit for the uses indicated in the site history provided.

Contamination

There is no material change to the environmental risk profile of the site, and further, I note that there is no significant development work that would afford an opportunity within the bounds of reasonableness to assess (& if necessary address) any pollution / contamination associated with the unit as a condition of approval.

As regards the environmental sensitivity of the area, I note that a main river line runs within a culvert beneath the units (Brockhampton Stream, oriented North>South). This watercourse would be regarded as an ecological receptor in it's own right, but it's sensitivity is elevated due to it's proximity to a European designated habitat (to which the stream discharges within 750m flow distance). In this way, the environmental context of the units is regarded as being sensitive to any pollution / contamination that may be associated with the site.

The historic use of these units and the proposed use are both considered to be potentially contaminating, and whilst I am not aware of any evidence of acute pollution associated with these, or any neighbouring units, there remains a risk of a chronic/cumulative contamination impact to sensitive receptors. Were this application to be for a comprehensive redevelopment of the site I would be seeking a formal contamination assessment.

However, as this application relates to a technical change of use from class which could arguably fall within a B2 classification, to a very similar operation; I would consider it unreasonable to seek an investigation (& remediation) at this time, especially in the absence of any indication of significant / gross contamination.

Flooding

The applicant's comments on flooding are noted. A similar argument to that applied to contamination above could reasonably be invoked in the context of this application - i.e. that there is no material change to the flooding risk (occurrence or impact) under the proposals put forward.

Ultimately, whether a formal FRA is required is a planning matter that falls outside the remit of Environmental Health as a consultee.

Notwithstanding the above, it may be useful to register a general / contextual comment. I would regard the site as being a moderate flooding risk; groundwater is likely to be shallow, and the river is located within the curtilage, communicated via a culvert that could be vulnerable to blockage. That the site has not flooded over the past 40 years indicates that the surface drainage system & culvert implemented at initial construction has been very effective; but risks remain. I would tend to agree that an assessment of the degree of flood risk is likely not to be particularly informative, however an assessment of the feasibility of flood mitigation measures could prove to be helpful for the applicant. This is likely to be particularly relevant under climate change scenarios which generally are assumed to represent a credible increase to flooding risk through increased frequency of extreme weather events.

Noise

It would appear relevant to note that there is no history of complaints associated with these units. The lack of nearby noise sensitive receptors, and general industrial / commercial character of the area would support a conclusion that no specific noise mitigation is required.

Mr. Jonathan Driver
Environmental Control Officer