

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/16/00784	Your Ref:	APP/16/00515
EH Case Officer Extn:	44 6677	Date:	08 June 2016
DC Case Officer:	Tina Pickup		
DC Case Officer Extn:	44 6461		
Application Number:	APP/16/00515		
Site Address:	18 St Georges Avenue, Havant, PO9 2RX		
Proposed Development:	Demolition of existing garage and construction of a single storey extension to be used as a B1(a) business office (Monday to Friday)		

Observations / Comments:

I have reviewed the application documents & environmental context of the site, and note that the proposals are for relatively minor development representing a reduced pollution exposure sensitivity class than the existing residential use.

Asbestos / Contamination potential

I note that the garage building to be demolished appears to be constructed from bonded asbestos sheet materials. Being part of an above-ground structure, this possible asbestos is not regarded as a contaminant, rather it represents potentially harmful pollutant that requires appropriate management during demolition (to include careful control of dust during handling), and disposal to an appropriately licensed facility.

Domestic garages within older properties in particular could be associated with the presence of some contamination, particularly through storage / handling / use of materials that have since been withdrawn from the market (e.g. pesticide preparations, asbestos containing maintenance products, creosote based wood treatments, lead paints etc.). Any automotive maintenance / repair could also result in the small scale release of contaminants. This is not expected to represent a significant risk in & of itself, but is mentioned here for context in respect of other possible sources.

Mapping information shows a former clay pit located partially within the rear garden of no. 18 St Georges Avenue. The South-eastern corner of that feature broadly corresponds to the SE corner of the garage to be demolished, so it is logical to assume that groundwork associated with the development is likely to coincide with this feature.

In terms of history, the pit is absent from 1897 mapping; appearing on the next available issue (dated 1909), and again absent from 1914 mapping. The next available issue is dated 1932, showing the property at no. 18 St Georges Ave. The pit is never marked as "old", suggesting that the pit was excavated to extract clay, and then backfilled relatively promptly prior to the construction of properties at St Georges Avenue. This in turn suggests either imported

materials (deposition on land to level off the excavation depression) or a 'cut & fill' operation (land levelling using natural materials).

Made ground is therefore anticipated, with potential constituents that could include imported construction & demolition wastes, some household wastes, glass, ash, coal, tar etc. Depending upon the nature of the fill materials, the feature could potentially act as a 'sump' for any contamination associated with the railway line and transported by gravity / within run-of. Given the probable dates of fill, fill is not anticipated to contain any significant quantity asbestos.

The scale & nature of the development is acknowledged, and must be balanced with the degree of risk. It is considered to be a proportionate approach to acknowledge the potential presence of fill at the site, and to require that the any development consented at this site progress under a watching brief for possible contamination, and if suspected; the minimum investigation be undertaken to facilitate an assessment of risk and determine the scope of and remedial / mitigation measures required. In order to provide certainty of consideration of these issues, confirmation of any actions taken, verification of any measures implemented, or alternatively a positive statement that none were necessary, should be required prior to occupation / bringing into use of the completed development

The following condition is recommended for the purpose described above.

“In the event that suspected contamination (soil, groundwater or buried waste materials) is encountered during groundwork; works in affected areas of the site shall cease until 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 comprise separate reports/statements as appropriate, but unless specifically excluded in writing by the Local Planning Authority, shall include;

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

All assessments, works, monitoring & other actions required by i)-iii) above (and B, below) shall be undertaken by competent persons, and 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 i-iii) 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 and the National Planning Policy Framework, there is a potential for contamination to exist at the site within made ground which could pose a risk to occupants”*

It should be noted that made ground (consisting of construction & demolition wastes in particular) is fairly common at residential premises - it is intended that the condition above apply

to "potentially significant contamination", which should be fairly self-evident.

For the avoidance of doubt, the presence of brick / tile / lime or cement mortars or glass would not be generally be regarded as potentially significant contamination unless also associated with discoloured/stained soils (blue / black / purple / orange), liquid tars, creosote, oils or fuels, solvent odours, metals (other than occasional fragments of ironmongery & nails etc.), fibrous materials, organic (e.g sulfurous) odours, or obvious household waste in quantities other than those which could be described as 'occasional'.

Mr. Jonathan Driver
Environmental Control Officer