

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/16/01390	Your Ref:	APP/16/00963
EH Case Officer Extn:	44 6671	Date:	10 October 2016
DC Case Officer:	Daphney Haywood		
DC Case Officer Extn:	44 6513		
Application Number:	APP/16/00963		
Site Address:	81C London Road, Waterloo, PO7 7EL		
Proposed Development:	Redevelopment to provide 30No. new flats (19No. 1 bed and 11No. 2 bed flats) comprising demolition of 81C London Road and construction of 1No. three storey block to the front with commercial unit on the ground floor and 1No. three storey residential block to the rear together with the addition of a third floor roof extension to the principal frontage building; conversion of commercial space at first floor to residential; with associated minor alterations, car and cycle parking, refuse storage facilities and landscaping.		

Observations / Comments:

I have reviewed the application & supporting documents, alongside my previous consultation response (GEN/16/00519).

Contamination

The applicant has interpreted my previous comments on ground contamination correctly, in that the site is not a zero risk (of contamination being present, in form of local made ground &/or resulting from the presence of electricity transformers from the first half of the 20th Century), but that the form & context of development is essentially low risk.

I do not consider the risks to future resident (in terms of the likelihood of being realised) as being sufficiently severe as to require an intrusive contamination assessment as a condition of consent. It is considered that any contamination likely to be of material significance to the proposed development would likely be identifiable by visual / olfactory means by suitably briefed groundworks contractors.

I would therefore hold to my original recommendation, that a *"condition should be applied ...in order to formalise a watching brief for possible contamination during groundwork phases."*

Suggested wording is reproduced below.

"In the event that material is encountered during groundwork that is suspected to represent contamination (e.g. buried waste materials, impacted soils or groundwater); 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) A physical 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 (as appropriate);

- 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: *In the interests of the amenity of the locality and having due regard to policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011 an the National Planning Policy Framework; contamination impacted soils & waste materials including asbestos may be present at the site associated with service infrastructure or the construction & demolition of previous structures"*

Asbestos

I had previously highlighted the likelihood of asbestos presence within the extant structure, alongside the likelihood of disturbance in the course of conversion works (and inevitable disturbance in the course of demolition); suggesting a rather prescriptive condition requiring a pre-commencement asbestos survey, and verification of any necessary removal works .

Whilst I still believe that this is necessary, and that the adequate undertaking- & verification- of those works is important; this area falls more comfortably within the sphere of Health & Safety. Regulatory Controls are in place through the Control of Asbestos regulations, and it would be a duplication to seek a condition in this respect.

It is assumed that the applicant will be well aware of this issue & their responsibility in this regard. It is further expected that best practice will be employed in respect of dust control both during investigation & removal works, and during groundworks and demolition. For these reasons, no condition or informative is proposed in respect of asbestos within the fabric of the building(s)

Air Quality

I have read the pdt Hampshire transport & parking assessment. I would agree that there would appear little benefit in the production of a transport assessment given the target occupant for the proposed development, and for the same reason, I have no concerns regarding the contribution of the new residential dwellings to local air pollution. No adverse comments.

Other - Drainage

Rainwater management generally falls outside the remit of Environmental Health, other than as it relates to a vector for environmental pollution (particularly of soils & groundwater).

It is acknowledged that flooding falls within the remit of the LLFA, however as a general comment I note that the development drainage strategy relies upon there being no increase in the area of roofing or hardstanding, being (therefore) neutral in terms of contribution to flood risk (surface water being managed by the existing public system).

Whilst this is true, it strikes me that by avoiding the adoption of SUDS measures (e.g. rainwater storage and outbound flow control), these development proposals miss the opportunity to contribute to a reduction in local flood risk.

I have no objections on this basis, and propose no conditions - comments are offered merely as an observation that may support the comments of others or contribute to related discussions in respect of sustainability.

Mr. Jonathan Driver
Environmental Control Officer