

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/16/00894	Your Ref:	APP/16/00614
EH Case Officer Extn:	44 6677	Date:	04 July 2016
DC Case Officer:	Daphney Haywood		
DC Case Officer Extn:	44 6513		
Application Number:	APP/16/00614		
Site Address:	1 Salterns Close, Hayling Island, PO11 9PL		
Proposed Development:	Erection of 1No. 3 bed dwelling with integral garage and new access onto Salterns Close.		

Observations / Comments:

Reviewed application docs - No issues in respect of SUDS / Flooding. With respect to contamination; I note that a former clay pit was present on the adjacent plot. Neither the clay pit nor Salterns House were marked on mapping dated 1867, and the pit is marked as "old" on the next available map issue (1897). There is also a Brick Field located from approx. 100m to the East; suggesting a brick production operation. A clay mill & kiln are present to the north of My Lords Pond, so the area was certainly involved with brick manufacture, though the precise use of the various plots & structures / features is unclear.

There is very unusual mapping convention at Eastern Boundary of application site, depicting a 25 x 7.5m rectangular feature marked as a building, but (unusually) with dashed outline and land ownership bracing. This is the first example of this convention that I have come across, and I have been unable to ascertain precisely it's meaning, and how this feature is likely to differ from a conventional building.

Consequently, the use of this feature is unknown, but it is considered likely to represent an open-sided / roofed area, probably used for open storage. The bracing notation indicates clearly that the feature is associated with the clay pit (plot) and several other small outbuildings, and is therefore likely to be associated in some form with brick manufacture.

Brick fields can be associated with significant contamination, typically related to fuels (PAH), metals (Lead), or soil gas (infilled clay extraction pits).

In this respect, there is considered to be some risk (to the application site / proposed development) associated with these features; i.e. a potential for the site to be impacted by contamination to some degree. However, there are good reasons to conclude that the site should not necessarily be regarded as being 'likely to be contaminated', as outlined below;

- The potential source is located off-site, disjoint from application site, albeit with elements adjacent to the subject plot
- Fuels associated with brick manufacture would typically be solid (coal / coke)

- with low mobility & low bio-accessibility,
- Any associated waste disposal is likely to be to off-site location, or backfilling of the fmr. clay pit, located at some 50m distance,
- The rectangular feature is currently interpreted as representing covered storage - i.e. likely to be a roofed structure, limiting likelihood of leaching from stored materials (fuel stockpile, processed materials or fresh bricks, for example)
- It is by no means certain that brick production was associated with the plot adjacent to the application site - it is arguably more likely that the clay pit served the brick field to the east; even there, no kilns or chimneys are marked on any map issue. Production could have been limited to the mill / kiln site to the north, and the term 'brick field' (meaning an area where bricks are made & sold) could (where a kiln is absent) be equivalent to a 'builders yard', i.e. commercial supply site (low risk).
- Any gas ass'd with an infilled clay pit at over 50m distance is unlikely to present a significant risk to the application site - site is low lying and geology consists of low permeability clay soils; both features being likely to retard lateral gas migration.

Consideration of the above interpretation of the mapping data leads me to conclude that the risks are more likely to be 'negligible - low', than 'moderate - high'. Given nature of development (single dwelling), and scale of risks (relatively low), it is not considered to be proportionate to require a proactive investigation of the application site.

It is however recognised that brick manufacture can sometimes be associated with activities that could result in significant gross contamination that would be a concern to both the water environment and to human health (e.g. creosote dunking), so it is reasonable to require that the applicant appropriately assess any soil which appears to be impacted by contamination (especially any tarry deposits, black staining, ashy combustion residues or significant deposits of broken bricks indicative of waste disposal).

If you are minded to grant consent for this development, please include the following condition, requiring that any suspicious ground conditions encountered are appropriately assessed, and any unacceptable risks to the future occupants of the property are adequately mitigated.

Condition 1

"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;

- 1) Investigation in the vicinity of suspected contamination, sufficient to characterise it's nature, likely extent & mobility,*
- 2) An appropriate assessment of the risks to all receptors that may be affected, based upon 1), and;*
- 3) Where potentially unacceptable risks are identified by 2), 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 1)-3) 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 1)-3) 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 potential for contamination associated with a former landuse at the adjacent plot to exist at the site. This contamination could, if present, pose a risk to the future occupants of the development"*

Mr. Jonathan Driver
Environmental Control Officer