

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/16/00827	Your Ref:	APP/16/00492
EH Case Officer Extn:	44 6677	Date:	17 June 2016
DC Case Officer:	Heather Lealan		
DC Case Officer Extn:	44 6523		
Application Number:	APP/16/00492		
Site Address:	Riders Junior and Infant School, Kingsclere Avenue, Havant, PO9 4RY		
Proposed Development:	Residential development of 25No. 2 to 2.5 storey 3 bed houses, 5No. 3 storey 4 bed houses and 8No. 2 bed apartments.		

Observations / Comments:

I have reviewed the documentation submitted in support of this application, and have identified few concerns with respect of pollution / site drainage, air quality or contamination. There is some uncertainty as to the degree to which the site is impacted by asbestos within topsoils & made ground. It would be appropriate to take steps to minimise the risk of unacceptably impacted soils remaining on site at the completed development. Submitted documents make reference to the formulation of mitigation provisions that are not adequately described with the application. It proposed that these be secured by means of an appropriate condition.

Detailed comments below.

Contamination

The site was predominantly greenfield from <1867, with some minor exception, remaining undeveloped to present day. It is assumed that the land is likely to have been associated with Riders Lane farm until around 1953. 1959 map edition shows residential property on Dunsbury Way, including land formerly occupied by Riders Lane Farm. A 20 x 6m structure exists at the East of the application site, possibly associated with Riders Lane School. The site is shown as at present in 1964 map issue. There is no known filled land / made ground / other potentially polluting or contaminating activities or incidents associated with the site; and consequently gross contamination would not be expected. Minor deposits of made ground might be expected, associated with the demolition of the former structure or with the school – given date of construction & demolition, asbestos containing materials may be expected to be found within any associated made ground encountered.

The results of the site investigation were broadly as expected, and were largely favourable. I have no concerns over the elevated Boron identified, and no other metals, inorganics, hydrocarbon contaminant (inc. PAH & BTEX) were elevated above their respective GACs.

The 'detect' of a fragment of asbestos insulating board (AIB, containing amosite) is not contrary to initial expectation, but does represent a concern. Whilst comprehensive in spatial distribution, the site investigation consisted of boreholes & window samples only (no trial pits) and so is likely to have examined less than 0.00003% of the total area of the site. The identification of a single fragment of asbestos in non-targeted sampling over anything approaching this small a proportion of land area suggests that asbestos fragments are likely to be present in relatively significant numbers.

WS2 (containing the fragment) is categorised as made ground solely on the basis of the presence of AIB, and is otherwise indistinguishable from any other sample of topsoil recovered from elsewhere on the site. It is therefore not possible to draw the conclusion that Asbestos is associated with a discrete & delimitable deposit of made ground (for example). It is accepted that the identification of AIB in soils could represent a statistical anomaly (i.e. where we could conclude that asbestos presence on site is negligible) or it could represent a one of a significant number of inclusions. There isn't sufficient to draw a confident conclusion; and in the absence of any indication of the contrary, the latter must be assumed to be more likely.

It is accepted that no free fibres were identified in soils, and that the presence of a single fragment of asbestos is not necessarily a cause for undue concern - it is however appropriate to treat this result with caution. The Ridge Consulting report recommends;

- That any Made Ground encountered be removed from site or placed under permanent hard standing / engineered cover system
- That a Discovery Strategy be prepared, outlining provisions for training/briefing groundworks staff, procedure upon discovery (e.g. segregation / stockpiling), procedures for examination/testing suspicious materials, and notifying the local planning authority of activities, results and discoveries, and to agree appropriate actions upon positive identification.

Given the identified risk, these provisions are agreed to be both appropriate & proportionate. I note however that no discovery strategy has been submitted with the application to define or formalise these arrangements.

The report body also references enhanced dust suppression (both for the protection of site staff during construction, and immediate neighbours), though no construction environmental management plan (CEMP) or method statement (CMS) was submitted with the application, and no specific proposals are included elsewhere in this regard. It is considered appropriate to formalise enhanced dust suppression as a mitigation measure; and I would suggest that it would be appropriate to include this within the proposed 'contamination discovery & risk mitigation strategy' and to secure this by means of a suitable bespoke condition (suggested wording below).

Condition 1

"Prior to the commencement of development approved by this planning permission, the 'contamination discovery strategy' proposed within Ridge Ground Condition Assessment Ref: 151240-815-01 v1 Aug 2015) shall be submitted to and approved by the Local Planning Authority. The strategy shall outline;

- i. Precautionary risk mitigation measures to be adopted during groundworks,*
- ii. Procedures for identification & assessment of contamination-impacted soils, and the management of materials undergoing testing &/or treatment, and*
- iii. Provisions for reporting assessment activity, notifying the Local Planning*

Authority of any relevant discoveries, agreeing remedial actions & standards, and evidencing works undertaken.

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 iii) above; demonstrating that remediation / risk mitigation 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; to ensure that risks to site workers, neighbours, and future occupants of the site are minimised"*

Drainage Strategy (Pollution Risk)

I note that the site soakaway assessment includes a markedly different description of soils to those characterised within the site condition assessment - identifying clayey soils largely unsuitable for infiltration drainage. The site benefits from existing public surface water drainage, discharging to the Hermitage stream ~600m SW of the application site.

IN accordance with SUDS principles, the site warrants consideration under the 'simple index approach' (CIRIA 753 SUDS Manual; control of pollution inputs). The surface water drainage strategy presented proposed discharge to the public system via attenuation features designed to limit runoff to greenfield rates of <5l/s. The Hazard Level of the site is Low (0.5 / 0.4 / 0.4), and the Permeable Paving proposed (as the only pollution control feature) has index values of 0.7 / 0.6 / 0.6 - adequate to address the index risk values whether or not any additional features are adopted. No adverse comment.

Air Quality & Traffic Generation

In consideration of the location of the site in relation to the local road network, I have no concerns with respect to the exposure of future residents to existing air pollution.

I agree with the conclusions of the Connect Consultants Transport Assessment, that new vehicle trips generated by the site are likely to be low-negligible, and consider that the impact in respect of their related road traffic pollution impact is similarly likely to be negligible.

I note that the parking provision exceeds minimum policy levels, but that a the provision is minimised by virtue of the proportion of unallocated spaces. In this way, the level of provision is not considered contrary to policies to encourage modal shift - the site is reasonably accessible with respect to public transportation, and that the proposed dwellings allow reasonable space for secure cycle storage. No Adverse comment.

Mr. Jonathan Driver
Environmental Control Officer