

Consultee Comments for Planning Application APP/16/00093

Application Summary

Application Number: APP/16/00093

Address: The Town Brewery, 2 West Street, Emsworth, PO10 7DY

Proposal: External alterations in connection with proposed change of ground floor A4 use to flexible A1/ A2/A3 /A4/A5 use including rear extension. Conversion of first and second floors to form 2 x two bed apartments and rear extension to form 1 x two bed apartment with associated parking and external works.

Case Officer: Rachael McMurray

Consultee Details

Name: Mr Environmental Health Team

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On Behalf Of: Environmental Health Manager, Community Group

Comments

I have reviewed the application documents and environmental context of the application site, and have the following comments to make:

Potential Sources of Contamination

The site is certainly a former public house, and possibly a former brewery. A property with a strikingly similar footprint / plan area is shown to be present on the earliest available mapping (1866) and it is considered likely that the current building could pre-date this map issue by a considerable margin.

Given it's position, it is not unlikely that the property has been in use as a brewery / brewhouse / public house (or free house) since original construction. Contamination is not typically associated with brewing activities, and it is noted that the premises is of relatively small scale, and lacks a readily accessible yard area - consequently it is considered unlikely that any significant distribution activities (that might include on site fuelling) would have been previously undertaken at the site.

I have been unable to find any reliable information with respect to the precise use of the Town Brewery building, however it is noted that it is located within approx. 250m of a former malt house and mill, so it is reasonable to assume that if used during any period primarily for brewing, grain would have been delivered in 'ready to use' condition without the need to process locally.

The brewing is a thermal process, requiring strong heat to halt the fermentation of the mash. There is no industry standard fuel - and the use of solid fuel, oil or gas fired boilers at the site is a

possibility, each carrying a different degree of risk. Oil leaks, and / or the local disposal of combustion residues (tars & ash) are the principle concerns. Spent grain is organic & would if disposed of locally on site (e.g. by burial) would pose a risk as a local source of methane / CO₂ - whilst this is a possibility, it is not thought to be likely as spent grain has value as an animal feed, ingredient in breadmaking, or for brickmaking (all uses for which there would have been likely to be relatively local demand). Local disposal of ash & residues is more likely, though again this depends on both the fuel used, and local demand for waste materials for use in other processes.

Public Houses in this area have also been known to be associated with contamination through local waste disposal by burying. Where present, such features can be significant for coincident structures & landuses.

It is also noted that the proposed extension is within 10m of an inter-war electricity substation, believed to be present from at least 1932. Equipment of this age would have been insulated using PCB containing transformer oil, possibly to as recently as 2000. The local geology is such that vertical migration of any spilt / leaked oils might be retarded, and lateral migration encouraged. Such leaks are not particularly common, but PCB containing transformer oils have a relatively high toxicity, and so could be significant if present.

Contamination Risks / Likelihood, Conclusions

The likelihood of the potential contaminants mentioned above being present on site is not necessarily high, but could be significant to sensitive receptors in close proximity, particularly those overlying.

The presence of contaminants (comprising locally buried waste materials, ashes & combustion residues, or migrating oil contamination associated with the sub-station) are however likely to be readily identifiable by visual means, and are not likely to be significant if not identified by visual / olfactory means during groundworks.

It is noted that the ground floor of the original building is to be retained as a commercial landuse (low exposure risk), however the new extension to the rear is considered to be sensitive (being 2 bed residential with private garden area, where occupancy including young children is not unlikely). In this way both shallow soil quality (i.e. within 600mm ground levels) and presence of gas / vapour (i.e. potential ingress to residential property) could be significant for the rear extension.

Given the relatively low likelihood of presence, the nature of the potential contamination, and the small scale of the development; it is not considered reasonable to require an intrusive site investigation. It is

In the event that any suspected contaminated soils or groundwater (including discoloured soils or groundwater, oils or oily sheens, foul or solvent odours, or deposits / inclusions comprising obvious waste materials) is encountered during groundwork, or if groundwork staff report acute symptoms (skin, eye or respiratory) suspected of being related to soil quality; 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 as appropriate, but unless specifically excluded in writing by the Local Planning Authority, shall include;

- 1) A site investigation in the vicinity of the suspected contamination, of a scale sufficient to characterise its nature, likely extent & mobility
- 2) An appropriate assessment of the risks to all receptors that may be affected, including those off site.
- 3) Where the risk assessment (2) identifies potentially unacceptable risks, a Remediation Strategy that includes;
appropriately considered remedial objectives, and;
clearly defined proposals for the remediation &/or mitigation of identified risks, having due regard to sustainability
- 4) Where a remediation strategy (3) identifies actions required to remediate contamination or mitigate risks associated with the presence of contamination, a Verification Report that includes;
Sampling & monitoring results, photographic, and other technical/statistical information sufficient to demonstrate that remediation strategy objectives have been met, and where necessary;
Further plans for monitoring, provision for maintenance of barriers or other structures required for remediation or other risk mitigation, and any relevant trigger values and contingency actions as may be required to address the identified risks (a long-term monitoring and maintenance plan).

All assessments, works, monitoring & other actions required by 1)-4) above shall be undertaken by competent persons, and the scheme shall be implemented as approved"

Reason: Having due regard to policies DM10 of the Havant Borough Adopted Core Strategy (2011), and DM17 of the Havant Borough Local Plan (Allocations) (2014); there is a low probability of the presence of Contamination resulting from historic uses of land or buildings at the site that could, if present, pose a significant risk to future site occupiers"

If no contamination is uncovered during groundworks, a statement as such from the principle contractor or applicant would be sufficient to discharge this condition upon completion of all below ground works (installation of founds, hardstanding & services). Neither a specific specialist report, nor empirical sampling data would be necessary to confirm a lack of risk.

The intention of the above condition is to provide an impetus to engage the Local Authority in the event that unusual or unexpected ground conditions are encountered, and to ensure that any associated risks are appropriately dealt with.

Radon

The site lies within a class 2 Radon area. New-build property is not required to incorporate any radon protection, however this determination is made on the basis of some underlying assumptions in respect of the means & quality of construction.

The Town Brewery is a traditionally constructed property (and therefore at a higher risk of , and the proposed ground floor flat has some internal airspaces contiguous with the traditionally constructed element. There is a marginally elevated risk that the indoor radon levels within the property exceed the action threshold (1-3% properties exceeding, compared with the minimum risk level of <1%). As an advisory to the applicant; given that there is an existing structure at the site which is to be largely retained - indicative quantification of indoor radon levels might be a sensible precaution prior to finalising construction details. Alternatively, the adoption of precautionary construction methods (with respect to the entire footprint of the ground-floor residential unit), i.e. those that are inherently resistant to radon ingress would be good practice in the absence of indicative monitoring.

These are matters which are advisory only, and are considered to fall within the remit of Building Control (compliance with document C).

Air Quality

Within it's local context, the proposed development is not considered to be sensitive in terms of exposure. No adverse comment.

Noise & Vibration

It is noted that the design & access statement touches upon noise transmission between commercial & residential units. I expect that Mark Moss will provide detailed comment in this regard, but it is noted that the age of the property (and the probable desire to retain some of the character of the building within the ground floor commercial unit), may limit the options for the provision of acoustic separation between these use-types.

Mr. Jonathan Driver
Environmental Control Officer