

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/16/00451	Your Ref:	APP/16/00275
EH Case Officer Extn:	44 6677	Date:	05 April 2016
DC Case Officer:	Rachael McMurray		
DC Case Officer Extn:	44 6546		
Application Number:	APP/16/00275		
Site Address:	84-86 Jubilee Road, Waterloo, PO7 7RE		
Proposed Development:	Erection of stand alone two classroom block located in car park to front of existing building.		

Observations / Comments:

I have reviewed the application documents, the environmental context of the site, and previous responses from Environmental Health in relation to this premises. Comments here relate to Contamination risk only, you may receive further comments from Environmental Health under separate cover in relation to nuisance / noise / light etc.

There are no concerns with regards air quality / pollution.

Site History / Ground Contamination Risks

Previous comments made by Environmental Health in respect of the 84-86 Jubilee Rd. site have noted that potential sources do exist within the north/north-eastern portion of it's curtilage, and that potential sources of contamination exist on both adjacent & nearby premises; predominantly comprising buildings associated with engineering uses. Conclusions are reproduced below for context:

"If the current building on the site were to be demolished & replaced with a purpose built specialist educational facility; I would certainly seek suitable conditions to require the investigation of ground quality, and suitable remediation if appropriate.

However, it is not considered to be proportionate in the context of the proposals, and in absence of any empirical or anecdotal evidence of actual contamination, to require a physical investigation of soils. This position accounts for the fact that these soils underlie existing impermeable hardstanding that would act as an effective barrier to any meaningful outdoor exposure, with reference to direct contact, ingestion & dust inhalation routes and the location of potential on-site sources coincident with the secure play area.

You may wish to inform that applicant however that any comprehensive redevelopment of the site is likely to require intrusive investigation of soils to confirm the absence of unacceptable risk, or to undertake works to reduce any identified risks to acceptable levels."

The current proposals are not regarded as 'comprehensive redevelopment', however they may represent development where contamination could be materially relevant.

The proposed classroom block is to be located over brownfield land, previously occupied by a structure that is assumed (with reference to its size, proportions & position within its plot) to have been in residential use - considered likely to represent a 'negligible' - 'very low' risk.

The position of the proposed block is however within 35m of the former textile works, being a landuse sometimes associated with persistent VOC's, and mobile heavy metals. As has been previously noted, the subject site is assumed to be (likely to be) up-hydraulic gradient of the former textile works (limiting risk), but that local conditions could allow for a viable migration pathway. Historic features & geological records indicate that groundwater is likely to be mobile in the area, and it is known that flow directions can vary significantly on the local scale. This potential source is of concern principally due to the possible presence of volatiles on shallow groundwater, and the potential for a vapour migration pathway into the internal classroom space to be established as a result of this development.

I note that the design & access statement refers to the proposed building being a 'modular structure'; assumed to represent a temporary, pre-fabricated structure not requiring foundations (not requiring the removal of extant hardstanding), and incorporating a ventilated space between the internal space and the ground. If these assumptions are accurate, I have no material concerns with regards contamination (as previously - not considered reasonable to require investigation within the scope of the current proposals).

If installation is likely to require significant groundworks, or the structure does not provide a robust separation between soils and the internal classroom space (uses a construction method that permits ingress of soil gas / vapour to the structure e.g. by thermal stack effect); I would be inclined to seek to secure a limited site investigation & risk assessment by condition, for the purpose of establishing the level of contamination risk with respect to this sensitive landuse (alongside the mitigation of any unacceptable risks identified).

Technical details with respect to the scope of groundworks required to accommodate the proposed structure should be confirmed with the applicant, and standard ground contamination conditions be applied in the event that the structure comprises a conventional permanent structure.

Mr. Jonathan Driver
Environmental Control Officer