

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	DCS/EH/JPD/130618001	Your Ref:	[As Application Ref:]
Ext. No:	6677	Date:	03/10/2014

DC Case Officer: Aaron Wright
Application Number: APP/13/00974
Site Address: 3 Elm Grove Hayling Island PO11 9EA
Proposed Development: Creation of new building following demolition of timber workshop and garages and change of use from printers to MOT test centre and 1No. 2 bed dwelling.

Observations / Comments:

I have briefly looked over the revised application documents. This case has been allocated to Mr. Mark Moss for comment regarding noise, lighting, and any other possible nuisance issues. I believe that an objection was lodged previously on noise grounds, but I will leave it to Mark to comment in this regard as appropriate.

The comments made here relate to Air Quality & Ground Contamination only, and should be read without prejudice to previous objections made with respect to unresolved noise concerns. The comments are largely reproduced from the previous response (to application APP/14/00496).

The revised scheme notably introduces a residential unit in lieu of workshop space, representing a sensitive landuse that is relevant from a ground contamination perspective as an "on-site" receptor. The main difference between these comments and those provided previously is an amended 'reason' for proposed conditions, to include future residents of the proposed unit. Amended text is marked in bold.

Ground Contamination

It is understood that the previous use of the site was a print works. In the absence of any specific information, it is assumed that the site has been used for this purpose since its construction sometime around 1970.

Printing activities are considered to be potentially contaminating, and given the period of occupation, is not unreasonable to assume that some degree of contamination is likely at the site.

The proposed landuse is similarly considered to be potentially contaminating. Environmental management practices, waste handling & containment equipment (etc.) are all expected to be of a higher standard than would be expected for a business operating in the 1970's/80's, yet potential failures of equipment or management (poor housekeeping), or indeed simple accidents would not be unforeseeable with this type of business.

I do not consider that there is a likely to be particular risk to site employee's or customers from this site, either in it's existing condition or as proposed. However, the geology is river

terrace deposits overlying Portsmouth sands – both porous and capable of facilitating the migration of contamination.

The nearest **existing** residential properties (rear gardens, considered to be sensitive receptors) are < 20m from the site, and the groundwater is expected to be shallow (relatively close to the surface, possibly 1m below ground level or shallower) at this location. **The amended proposals also include a residential unit with a small private garden area on site that is considered to be directly relevant to any contamination that may be associated with the print works.**

~~The noise objection notwithstanding~~, if development control are minded to grant consent for this scheme, it is considered ~~appropriate to take the opportunity to ensure that the site does not constitute a source of contamination that could affect nearby residential properties.~~ **necessary to confirm the risk status of the site, both with respect to the proposed residential unit, and in relation to neighbouring residential properties.**

I would therefore request that the following conditions be placed upon any consent granted:

Condition 1

Prior to the commencement of development approved by this planning permission, a scheme to deal with the risks associated with potential ground contamination at the site shall be submitted to and approved in writing by the Local Planning Authority. That scheme shall include all of the following elements unless specifically excluded, in writing, by the Local Planning Authority.

1. A site investigation scheme appropriate to the scale of the site and to its previous commercial use(s), to provide sufficient information for an appropriate assessment of the risks to all receptors that may be affected, including those off site.

2. The results of the site investigation and risk assessment (1) and if appropriate, a remediation strategy based on these results giving full details of the remediation measures required, and how they are to be undertaken.

3. A verification report shall be prepared on completion of the remediation measures set out in (3) (if any) confirming that measures have been undertaken in accordance with the method statement, and setting out measures for maintenance, further monitoring and reporting

All elements shall be adhered to unless agreed in writing by the Local Planning Authority.

Reason: To prevent future occupiers of the proposed residential property, from being exposed to unacceptable risks arising from previous commercial land uses undertaken at the development site; to ensure that the site does not pose a risk to nearby residential properties, and having due regard to policies and proposals E1 of the Hampshire County Structure plan 1996-2011 (Review), and DM10 of the Havant Borough Adopted Core Strategy (2011)

Condition 2

"If, during development, contamination not previously identified on site is found to be present (for example solvent odour, stained or discoloured soils or sub-soils), no further development shall be undertaken until a report has been submitted to and approved by the Local Planning Authority detailing how that contamination is to be dealt with. Unless otherwise agreed in writing with the Local Planning Authority, all works outlined in the submitted report shall be adhered to."

Reason: To prevent occupiers of nearby residential properties, and future users of the site from being exposed to unacceptable risks arising from previous land uses undertaken at the development site; and having due regard to policies and proposals E1 of the Hampshire County Structure plan 1996-2011 (Review), and DM10 of the Havant Borough Adopted Core Strategy (2011)

It is recognised that the scale of the development is relatively small – and for clarity, the anticipated scope is to confirm that no gross contamination arising from the former use of the site as a print works is likely to affect nearby residential property, **and to ensure that sufficient protection is designed in to the structure of the proposed unit so as to prevent unacceptable exposures occurring.** The scope of the works need only be treated as a 'preliminary' investigation, however sampling suites should include VOC / PAH, and should sample groundwater if encountered.

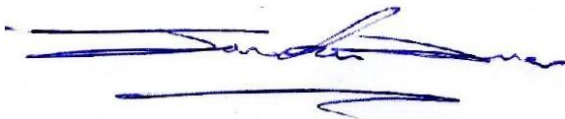
More detailed investigations (**or risk mitigation measures**) may be required following unfavourable preliminary results. As a technical note, although this is a small site, it may be beneficial for the applicant to seek to determine the groundwater flow direction by use of levelled window samples (finished as wells) as opposed (or in addition) to trial pits. There is a general lack of sensitive receptors around the site, and in the event that contamination is identified at the site, migration direction may be a critical factor in determining further action.

Air Quality

Air Quality in the Elm Grove area is known to be good. The proposed activities at this site are considered unlikely to be capable of materially affecting local air quality, and the site is considered to be of insufficient scale to have any material impact on local traffic movements or congestion.

I therefore offer no adverse comment on air quality grounds.

Best Regards,



Jonathan Driver
Environmental Control Officer