

Dealt with by: Environmental Health

Our Ref: **smd/2022/0050**

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Date: 2nd August 2022

MEMORANDUM: PLANNING CONSULTATION
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LOCATION

7 Derby Street, Leek

PROPOSED DEVELOPMENT

Change of use upper floor for HMO for 5 no room and internal alteration. First floor single-story rear extension, alteration to ground floor to staircase, and front elevation for refuse store.

Potential Areas of Environmental Concern -

1. Renovation Impacts (condition)
2. Sound insulation between rooms (Building Regulations)
3. External noise (Condition noise assessment mitigation and pre-completion testing required)
4. HMO Housing Standards (Licence)
5. Bin arrangements (Object)

General Comments – as per original application smd/2021/0137

Asbestos: A Demolition or refurbishment asbestos survey and risk assessment should be carried out prior to the demolition/renovation of the existing buildings. The enforcing authority for this type of work is the Health and Safety Executive (HSE) and it is recommended that you contact them directly to discuss their requirements: <http://www.hse.gov.uk/>

- Sound: A revised assessment by Peak Acoustics (ref. TW1207216NR ver 1.0 dated 25/11/2021) has been supplied to address noise concerns and take account of heritage concerns. If permission is granted the mitigation set out in this assessment should be completed in full and a pre-completion test should be undertaken to ensure compliance with the assessment.
- The internal transmission of noise between the proposed residential units would be dealt with through building regulations.
- Housing standards – the proposed HMO will be subject to housing inspections if granted permission and will require a licence. The Housing Standards Officer has raised the following concerns and advice –

Paragraph 15.23 of the Housing Health and Safety Risk Rating Scheme Operating Guidance states that 'There should be suitable and sufficient provision for the storage of refuse awaiting

collection or disposal outside the dwelling. There should also be suitable and sufficient provision for the storage of household refuse within the dwelling. The storage provisions should be readily accessible to the occupants, but sited so as not to create a danger to children. The refuse facilities should not cause problems of hygiene, nor attract and allow access to pests.'

Paragraph 15.24 of the Housing Health and Safety Risk Rating Scheme Operating Guidance states that 'For houses, bungalows and houses converted to self-contained flats, there should be a clearly defined area for refuse containers. This is best in the open air, and away from windows and ventilators, and, if possible, in shade or in a shelter.'

The potential health outcomes associated with poor refuse storage facilities include gastro-intestinal disease (from spread of infection), and asthma and allergic rhinitis (from allergens). Household waste may, in addition, present a physical hazard of cuts to young children. Emotional distress is also commonly associated with pest infestations, and accumulations of refuse. Premises which are difficult to keep clean may be a cause of depression and anxiety.

Insect pests can cause allergic reactions. Children who live in dwellings visibly infested with cockroaches show high levels of sensitivity to cockroach allergen. Contact with cockroaches can cause dermatitis, urticaria, rhinitis, bronchitis and asthma. Some people have an aversion to cockroaches amounting to a phobia and can suffer anxiety when in the presence of the insects.

Insects are also responsible for food spoilage, rendering it unpalatable if not inedible. Insect pests, including flies and cockroaches, are known to be mechanical vectors of diseases, picking up disease causing organisms on their bodies from one source and transferring it. Their behaviour means that they travel from matter such as rotting garbage and animal faeces that are infected to food intended for human consumption.

Rats and mice are known to be infected with pathogenic organisms. Rats have been found to be infected with such zoonotic agents as *Yersinia enterocolitica* (Yersiniosis), *Listeria* spp (Listeriosis), *Cryptosporidium parvum* (Cryptosporidiosis), *Toxoplasma gondii* (Toxoplasmosis), *Leptospira* spp (Leptospiral Jaundice or Weil's disease), *Trichinella spiralis* and *Trichuris* spp (Whipworm infection).

Birds, such as pigeons, can cause nuisance, carry diseases including *Salmonella* and can harbour biting insect pests such as the Martin Bug in their nests.

All age groups may be vulnerable to infections associated with dirt, dust and those passed on by pests. Young children may be the most vulnerable to infection and cuts associated with poorly stored refuse, through lack of awareness of dangers. Asthmatics and those with pest allergies will be most vulnerable to allergic reactions to pests.

The view of the Housing Service is that it would not be appropriate for there to be a communal internal refuse storage area for the temporary storage of household waste. It will lead to offensive odours and potential insect and rodent infestation if not effectively managed. Individual occupiers should be responsible for their own refuse storage arrangements within their dwelling unit and should be required to deposit their household waste in suitable and sufficient outdoor refuse containers ready for collection.

Additional comment on resubmission – The proposed bin storage area will be inside the property, so our comments relating to smd/2021/0137 remain valid. The proposed bin storage area will contain 2 standard household waste bins inside the front door and at the bottom of the stairs. There are only two standard bins proposed for 5 flats which we believe will not be sufficient, this will lead to overflowing bins and associated litter and detritus in the bin area. The bin storage area reduces the width of the escape route for residents, this should be checked with building control. This latest resubmission for this development does not address the

significant concerns we have re. public health and future safety for residents in this HMO if it was granted permission.

Recommendation – Environmental Health recommends refusal due to inadequate and unsustainable bin arrangements. The living standards of future occupiers will be significantly compromised by the proposed internal bin storage areas.

Advisory Note/ Informative:

Please be aware that the responsibility for safe development and secure occupancy of the site rests with the developer.

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- Any approved noise scheme and measurements should pay due regard to British Standard BS8233: Sound insulation and noise reduction for buildings (Code of Practice), BS4142:2014 Methods for rating and assessing industrial or commercial sound and/or the Building Regulations 2010 Document E or other appropriate guidance.
- Advice on controlling flies and light can be found in: Statutory Nuisance from Insects and Artificial Light (defra 2005) available as a free download <http://archive.defra.gov.uk/environment/quality/local/legislation/cnea/documents/statnuisance.pdf>
- During any demolition and construction activities (including landscaping) the contractor shall take all reasonable steps to prevent dust formation and prevent any dust formed from leaving the site boundary.
 - The control of dust and emissions from construction and demolition Best Practice Guidance, produced by the greater London councils <http://www.london.gov.uk/sites/default/files/BPGcontrolofdustandemissions.pdf>
 - Building Research Establishment Guidance Document 'Control of Dust from Construction and Demolition Activities' (BR456)

Regards,

Environmental Health