

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/23/01580	Your Ref:	APP/20/01221
EH Case Officer Extn:	44 6677	Date:	19 July 2023
DC Case Officer:	Ms Ikrame Essalih		
DC Case Officer Extn:	-		
Application Number:	APP/20/01221		
Site Address:	Land to the west of B&Q, Purbrook Way, Havant		
Proposed Development:	Erection of retail foodstore with associated car parking, access, landscaping and engineering works (approved 2.12.22). Request to discharge conditions 3, 4, 12 and 15 (rec'd 4.5.23). A request has been made to discharge the following condition(s) on the above application: Condition 12 [Further Contamination Assessment & Remedial Proposals]		

Observations / Comments:

I have reviewed the revised Remada Ltd. Phase 2 Ground Investigation Report Ref: 770.03.01 (Received separately to the current application), alongside the submitted Remediation Strategy Ref: 770.04.01 which comprises in practice an additional contamination assessment which builds upon the information contained within the preceding reports.

The revised Phase 2 report updates the previous document with the results of some additional geotechnical work undertaken to inform the foundation design. No additional soil/groundwater/ground gas data was included within the revision, although two additional soil profiles are documented, being broadly consistent with the previous descriptions (describing made soils to around 4m depth, containing inert inclusions of anthropogenic origin). Notably, neither of these new descriptions included any reference to visual or olfactory evidence of contamination.

The Remediation Strategy describes an additional 5 no windowless sample trial holes & additional soil sample results. The soil descriptions from these trial holes did not include any reference to either visual or olfactory evidence of contamination, nor to any anthropogenic (manufactured product) inclusions. Made soils are described simply as 'earthworks fill', identified by the presence of naturally occurring materials out of succession (evidence of disturbance & placement).

The results of soil sampling reflect this character of soils, identifying pH & Metals broadly in line with background levels, and organic carbon compounds below the limit of detection across the board. Essentially, the soils results have 'tested clean', which lends weight to the view that the previously identified olfactory evidence of hydrocarbon contamination (associated with the earthworks fill) is not likely to be common to this material, and is more likely than not to be an

outlier (uncommon occurrence, representing a relatively small volume of the total deposited material). The revised conceptual model for the site is unchanged, concluding negligible risk for all pollutant linkages. This is considered to be reasonable given the latest results.

The remainder of the document is structured as a remediation method statement, but largely comprises works necessary for geotechnical purposes and works that fall under a separate pollution control regime (waste regulations, definition of waste voluntary code of practice [DoWCOP]). A loosely defined procedure for addressing unforeseen contamination is outlined at 5.3.4, and 5.6 reiterates the risk mitigation measures required to address the soil gas risk assumed from the gas monitoring previously undertaken (which identified significantly elevated CO₂, but only at very low volumetric flows).

The most notable omission from the verification plan is any proposal to document the installation of gas protection measure.

Otherwise, the sampling rates described in the remediation outline method statement are acceptable, as are the remaining provisions of the verification plan.

For the benefit of the applicant, it is expected that the verification report will include documentation of satisfactory installation of gas risk mitigation. However, the risks at this site are not sufficiently high that I would insist upon the amendment of the 770.04.01 report to expressly include verification of the gas risk mitigation works, in order to support discharge of c.12. I am content to rely upon the wording of c.13 ('...and must demonstrate that site remediation criteria have been met.') and 4.2.1 (Environmental Remediation Objectives '*install basic gas protection measures*'), and 5.6 (describing the mitigation standard required).

The 770.04.01 report is accepted as-is, and the basis of that (and the preceding-) report(s), I support the discharge of c.12 in full.

Mr. Jonathan Driver
Environmental Control Officer