

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	DCS/EH/JPD/131119001	Your Ref:	[As Application Ref:]
Ext. No:	6677	Date:	19/11/2013

DC Case Officer: Daphney Haywood
Application Number: APP/13/00804
Site Address: Woodcroft Farm Development Site, Woodcroft Lane, Waterloooville
Proposed Development: Development of 293 residential units comprising 6 x one bedroom, 115 x two bedroom, 132 x three bedroom and 40 x four bedroom, retention of existing farmhouse, new access road from Eagle Avenue, internal access roads, associated car parking, open space and landscaping and including works to trees under TPO 1931.

Observations / Comments:

Further to my previous, informal response to this application; I have now had opportunity to review the Peter Brett Associates site investigation Geo-Environmental & Geotechnical Ground Investigation Report in more detail.

This response will formalise comments made previously with respect to both Air Quality & Ground Contamination, including additional comments with respect to the latter.

Air Quality

I have reviewed the relevant parts of the Traffic & Transportation assessment to determine whether an Air Quality assessment is likely to be required for the proposals.

It appears that the anticipated contribution of the (completed) development to the number of vehicle trips on the local road network is in the order of 10-16% existing traffic flows on Hart Plan Avenue / Eagle Avenue respectively. The flows on these roads are however estimated to be below 10,000 vehicles per day (around 9,000 & 8,000), and the local air quality is not currently considered to be at risk of breaching any NAQS objective values. The basis utilised in the report for the distribution of new vehicle trips on the local road network, is considered to be reasonable and is such that no road section estimated to be carrying >10,000 vehicles per day is impacted by >10% (the screening threshold under NSCA guidance for planning & air quality).

It is noted however that that the proposals appear to include preparatory access roads that would facilitate further development within the East Hampshire district, accessed from the Havant Borough local road network.

If linked to this scheme (i.e. directly associated, and sharing access to the local road network with this development); further proposed development on a scale approximately similar to this application (circa 300 units) is likely to require an air quality assessment to be submitted alongside a wider assessment of the traffic impact upon the local road network.

Any air quality assessment undertaken in future for associated development(s) should account for the new vehicle trips associated with these proposals (if consent is granted), and

should consider 'worst-case' locations of relevant exposure with respect to roads & junctions impacted by road traffic associated with the respective developments (proposed & committed).

On the basis of the current proposals however, *I do not consider that an Air Quality assessment is necessary at this stage.*

Land Contamination

The Peter Brett Associates Geo-Env. & Geo-Tech GI Report (Ref: 21834/030 R02/rev01 – July 2013) concludes that there are no plausible site-wide contamination sources, and that the overall risk of the site is low. The report does however highlight some issues associated with made ground / former landfill (inert construction & demolition wastes), and made ground / vehicle dismantling & repair activities.

The area of landfill presents risks associated with ground stability, soil gas (in particular, Methane & Carbon Dioxide), and the chemical quality of soils. The vehicle storage / service / breaking yard has been positively associated with near surface made ground, hydrocarbons, PAH and metals contamination. Sampling within this area confirms a potentially significant concentration of total hydrocarbons within natural soils (outside the range of the proposed 'confidence' surface scrape), indicating a degree of vertical mobility.

It is notable that despite the status of the site as a source protection zone 1, the leachate / eluate sampling omitted a TPH screen, and omitted the testing of soils from the vehicle dismantling & repair yard. The yard area has returned values statistically indicative of a contamination hot-spot (or separate sample 'population', as might be expected). At this stage, this area has been subject to sampling of relatively limited resolution.

I note that the Environment Agency has not provided any specific comment with respect to the protection of controlled water (groundwater, principle aquifer & SPZ1), in its response to the consultation to this application. This is interpreted to indicate that the Agency considers this landuse to represent a relatively low groundwater risk. I would tend to agree that this landuse is likely to be a low risk to groundwater, based upon a number of factors, as outlined below;

- the shallow nature of the impacted made ground in the area of the vehicle dismantling & repair yard,
- the lack of a bulk source (e.g. fuel or waste oil storage) within the of the vehicle dismantling & repair yard,
- the significant depth to groundwater across the site as a whole, especially in the context of the clayey Lambeth group soils that are likely to have good retardation properties with respect to hydrocarbon contamination,
- the considerable distance to abstraction point (despite the implicit 50-day travel time from the water table, this would only apply to contamination that had reached the groundwater), and;
- the likely level of retardation, attenuation, and dilution that would occur between the site and the potable abstraction.

The eluate results presented within the report relate to the area of landfill, at 2.0m depth, and soils considered likely to be broadly representative of general fill material. Results indicate that no Environmental or Drinking Water Quality Standard (EQS / DWS) is exceeded, and I would therefore agree with the conclusion that there exists a negligible groundwater risk from this source.

The report conclusions focus upon human health risks from direct exposure to shallow contamination (metals, hydrocarbon & PAH), and risks arising from soil gas. Precautionary mitigation measures are proposed, comprising a combination of source removal and barrier methods to separate sources & receptors.

The proposals are based upon several assumptions. The report acknowledges that additional investigation may be required in order to confirm certain parameters to assist with the appropriate specification & design of mitigation measures, and that validation of implemented remedial / risk mitigation measures will be necessary.

I agree that the report indicates a low-negligible risk across the majority of the site, with potentially significant risks associated with landuses confined to relatively well defined areas of the site. Additional work is however considered necessary in the region of the former landfill & vehicle dismantling & repair yard for the purposes outlined above, in line with the report conclusions.

Given the sensitivity of the site (in terms of the proposed residential use, and potential groundwater sensitivities), I would also agree that a formalised contamination discovery strategy (as proposed) should be submitted. This will ensure that any contaminated soils that would not be anticipated on the basis of the available information, but that may nevertheless potentially pose an unacceptable risk, are identified and appropriately dealt with.

Whilst I have no objections to the proposals in principle, it is considered appropriate and proportionate (in line with the conclusions of the Peter Brett Associates report, and comments above) to impose suitable conditions to ensue that the development is safe & suitable for future site residents, and does not prevent the appropriate remediation of soil sources that might affect groundwater quality within a Source Protection Zone 1.

Condition 1

Prior to the commencement of construction within any specified phase or defined area the development approved by this Planning Permission (as may be agreed in writing by the Local Planning Authority), a scheme to deal with the risks associated with contamination of 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 scheme of further investigation, based on the previously submitted GeoEnvironmental & Geotechnical report. The scope of the investigation shall be sufficient to:

- i) confirm the preliminary assessment of the nature and extent of contamination at the site,*
- ii) inform an appropriate assessment of the risks to all receptors that may be affected, including controlled waters, and;*
- iii) enable the appropriate design of remediation and/or risk mitigation measures (if required).*

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

3. A verification report or statement (as appropriate) upon completion of the works set out in (2) [if any], confirming that measures undertaken have been implemented in accordance with the method statement, and have achieved the required performance standards. The verification report / statement shall provide details of any measures necessary 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 occupants of proposed residential properties being exposed to unacceptable risks from identified contamination & soil gas associated with automotive repair and landfill activity previously undertaken at the site, and to ensure that the site does not pose an unacceptable risk to the groundwater Source Protection Zone 1; 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), and DM17 of the Draft Local Plan (Allocations) 2012

Condition 2

Prior to the commencement of construction of any part of the development approved by this Planning Permission, a protocol for the identification & assessment of any unforeseen ground conditions shall be submitted to and approved in writing by the Local Planning Authority.

The provisions of the approved protocol shall be observed throughout the undertaking of all relevant construction activities.

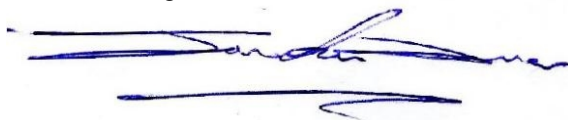
Reason: For the protection of workers and the general public during the development of potentially contaminated land, and to prevent future occupants of proposed residential properties being exposed to unacceptable risks from unidentified &/or unexpected contamination that may be associated with previous activities undertaken at the site; 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), and DM17 of the Draft Local Plan (Allocations) 2012

Condition 3

If, during development, contamination not previously identified at the site is found to be present, then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for an addendum to the Method Statement required under Condition 1, (2). This addendum shall detail how this unexpected contamination shall be dealt with, and the development shall not be carried out other than in accordance with the approved details.

Reason: For the protection of workers and the general public during the development of potentially contaminated land, and to prevent future occupants of proposed residential properties being exposed to unacceptable risks from unidentified &/or unexpected contamination that may be associated with previous activities undertaken at the site; 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), and DM17 of the Draft Local Plan (Allocations) 2012

Best Regards,



Jonathan Driver
Environmental Control Officer