

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/20/01131	Your Ref:	APP/19/00211
EH Case Officer Extn:	44 6677	Date:	28 May 2020
DC Case Officer:	Bee Crawford		
DC Case Officer Extn:	44 6514		
Application Number:	APP/19/00211		
Site Address:	37 Creek Road, Hayling Island, PO119QZ		
Proposed Development:	Conversion to form 1 bedroom flat with associated parking.		
	RECONSULTATION REQUEST for revised plans and/or documents received re contamination.		

Observations / Comments:

I have reviewed the Your Environment Ltd. Phase 2: Site Investigation Report YE7882 (iss.00). dated April 2020.

The report presents extensive sampling from a limited number of trial holes, limited in placement as a result of the existing structures on/at the site.

The results are more interesting than is immediately apparent – and show a trace hydrocarbon impact at the southern boundary of the site over a fairly extensive depth profile, up to 3.0m depth. The concentrations are not of particular concern for the subject site, but are indicative of a local source.

Elevated hydrocarbons are principally PAH congeners, and >C16 hydrocarbons (diesel- & oil-range organics). Some relatively light fraction polycyclics are also present (e.g. naphthalene), alongside >C8 aromatics – probably representing Toluene or a tolyl compound.

Groundwater monitoring does not identify any significant concentrations of dissolved-phase hydrocarbons, which is a very positive result which lends confidence to conclusions on the likely absence of a significant fuel source in soils close to the development land.

Counter to that however is the gas monitoring results, which identify quite significant gas flows within the gas-well, significantly depleted Oxygen, elevated Methane & Carbon Dioxide, and >LOD Carbon monoxide. This would tend to suggest that there is degradation of a local hydrocarbon source somewhere outside the investigated area that for whatever reason is not readily apparent in groundwater concentrations.

It is difficult to derive a conceptual 'contaminant source & transport' model for the site which accounts for elevated hydrocarbons in natural soils at depth, almost universally <LOD results from groundwater hydrocarbon tests, clear evidence of decomposition of organic matter in gas monitoring results, significant flow differences between different wells on the same sampling

event, and differences in the range of gas flux returned for each of the trial holes.

Notwithstanding the apparent conceptual disparities between the lines of evidence, the broad conclusions of the report are reasonable. There is no evidence of significant source of contaminants within the development red-line area, and water results do not raise red flags about a nearby 'plume edge'.

I would agree that concerns over gas results are justified, there is demonstrable flow, elevated methane, and evidence of decomposition of organics under oxygen depleted conditions. Trace volatiles are present, and the report is not explicit on whether the tabulated gas monitoring PID values represent 'not tested' or <LOD (all values are recorded as zero). The justification for gas protection is 'mitigating the potential for damage to the building fabric', and not directly for the protection of human health through exposure to a chemical contaminant.

Though there isn't the evidence presented in the report to conclude confidently that a hydrocarbon vapour resistant membrane would be necessary (e.g., the report doesn't mention PID testing, but includes zero values on results tables), CS2-level gas protection would provide a significant degree of protection against ingress of volatiles into living spaces.

The report is explicit that the recommendation to incorporate gas protection into the proposed dwelling does not comprise a 'remediation method statement', and is a recommendation only.

It should also be noted that the report also recommends that the specification of buried potable water supply pipework be considered against the contamination risk assessment. Presented date would indicate that Polyethylene pipe may be inappropriate at this site, as a result of Toluene concentrations within shallow soils. Results are marginal with respect to the use of PVC pipes. Liaison with the Portsmouth Water is recommended to confirm requirements.

Conclusion

The conclusions of the report may be accepted. The applicant has demonstrated that adequate protection for the proposed development can be achieved using relatively simple conventional methods, though no specific scheme is provided.

I take the submission of the report in support of the application as being implicit confirmation that the applicant is satisfied that the recommended gas protection will not place delivery of the development at risk.

On this basis, it is considered reasonable to support the application, subject to a condition to secure the proposed gas protection scheme & to formalise the watching brief outlined in the report. Suggested wording below;

[Condition 1] Contamination Risk Mitigation (Bespoke– based upon submitted SI recommendations)

Prior to the commencement development approved by this planning permission a scheme of contamination risk mitigation shall be submitted to and approved in writing by the Local Planning Authority.

The scheme shall be devised by competent persons and unless specifically agreed in writing by the Local Planning Authority, shall be in general accordance with the recommendations of section 12 of the Your Environment Report Ref: YE7882 (issue 00, Dated 22/04/2020), and shall include an outline verification plan which specifies the information that will be collected to demonstrate that the works set out within the scheme have been satisfactorily completed.

Reason: *To ensure that the risk to human health or the building is not placed at unacceptable risk,*

through the appropriate design & implementation of an appropriate scheme of contamination risk mitigation. This is in line with DM10 of the Havant Borough Local Plan (Core Strategy) 2011, DM17 of the Havant Borough Local Plan (Allocations) [2014], and paragraphs 178-180 of the National Planning Policy Framework."

[Condition 2] Verification Reporting (Bespoke)

Prior to the occupation of the permitted development, a verification report shall be submitted to and approved in writing by the Local Planning Authority. The report must;

- i) adequately demonstrate that the works outlined in the scheme of contamination risk mitigation **[Condition 1]** has been implemented,*
- ii) that the scheme is likely to achieve it's design criteria and will provide the expected degree of protection to the dwelling and it's future occupants, and*
- iii) provide EITHER a written statement confirming that no suspected contamination was identified during development, OR summary of actions taken under the contamination watching brief & discovery strategy demonstrating that the risk from suspected contaminated material has been appropriately managed.*

Reason: *To ensure that the risk to human health or the building is not placed at unacceptable risk, by demonstrating that the scheme of contamination risk mitigation has been satisfactorily implemented.. This is in line with DM10 of the Havant Borough Local Plan (Core Strategy) 2011, DM17 of the Havant Borough Local Plan (Allocations) [2014], and paragraphs 178-180 of the National Planning Policy Framework."*

Mr. Jonathan Driver
Environmental Control Officer