

# HAVANT BOROUGH COUNCIL

## Town & Country Planning Act 1990

### Consultation on Planning Application

#### MEMORANDUM

|                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                  |                            |
|------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|----------------------------|
| <b>From:</b>                 | <b>Environmental Health</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>To:</b>       | <b>Development Control</b> |
| <b>Our Ref:</b>              | CONS/20/00677                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Your Ref:</b> | APP/16/01237               |
| <b>EH Case Officer Extn:</b> | 44 6677                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Date:</b>     | 17 April 2020              |
| <b>DC Case Officer:</b>      | Lewis Oliver                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                  |                            |
| <b>DC Case Officer Extn:</b> | <b>44 6263</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                  |                            |
| <b>Application Number:</b>   | APP/16/01237                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                  |                            |
| <b>Site Address:</b>         | Mill Rythe Holiday Village 16 Havant Road, Hayling Island, PO11 0PB                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                  |                            |
| <b>Proposed Development:</b> | Demolition of 6,111 square metres of redundant chalets and facilities buildings, use of land for the siting of 203 holiday caravans including 5 caravans for use as staff accommodation, refurbishment of retained single and two storey holiday chalets to form 87 units of holiday accommodation, retain managers bungalow, sales area for 5 caravans, refurbishment of remainder of central facilities building, CCTV cameras, provision of new pedestrian concourse with terraces, splash and dry play areas, multi-games court, adventure golf course and outdoor theatre and new landscaping. Retaining existing pitch and putt golf course to the east of the site. (Approved 5.5.17). |                  |                            |
|                              | Request for partial Discharge of Condition 12 [Contaminated Land] (01.11.19)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                  |                            |

---

#### Observations / Comments:

I note that the application cover letter is dated 1<sup>st</sup> November 2019, and indicates that work in the identified 'phase 1 area' was scheduled to commence on 11<sup>th</sup> November 2019. Environmental Health logged the consultation on 10<sup>th</sup> March 2020, some 17 weeks following submission, and possibly as much as 16 weeks following the planned commencement.

It is assumed that works on site have proceeded / progressed in technical breach of the requirements of condition 12, and that the opportunity for further assessment / remediation has been prejudiced as a result (results notwithstanding).

The proposed redevelopment at this site is substantial in its spatial extent, and numerous potential sources of contaminants have been identified within the wider site. In this respect, notwithstanding the above, it would nevertheless be helpful to provide some comments in respect of the submission, if only in the interests of improving both submissions & procedure for future phases.

#### *Comments on scope & content of submitted documents*

The submitted plan identifying the phase 1 area corresponds to an area of the ASI proposed scope of site investigation containing 10 no. proposed trial hole locations. 10 locations have

been sampled, and it may be reasonable to assume that efforts have been made to adhere broadly to the approximate locations indicated.

However, it is also worth highlighting that the trial hole locations are not marked on the submitted plan, and that the ASI indicative scope did not assign references to trial holes (meaning that spatial interpretation of results is not possible) and allowed for 15 no. trial holes for 'phase 1'. As a result it is expected that the area defined under this application as 'phase 1' is smaller in spatial extent than was originally intended, and that it cannot be reliably assumed that the samples analysed are associated with the indicative locations shown within the ASI proposal.

I would also highlight that the samples were collected from an average depth of around 0.1m, with most corresponding to 0.05m depth. The scope of investigation agreed in principle indicated that samples would be taken from 0-300mm depth. No logs are submitted, so it is not clear that any formal pits were dug at all, and this omits the useful anecdotal information that soil profile descriptions represent.

I appreciate that the 0.05m depth was probably selected as the surface to which direct contact exposures are most likely to occur, but it is relevant that risk assessment standards treat the top 5-600mm (i.e. 0-600mm) as being equally relevant to surface exposures due to natural soil mixing processes (soil macrofauna & plant growth), and it is typical to avoid sampling near-surface topsoil to avoid the disproportionate influence of cover planting and aerobic surface conditions (particularly relevant to turfed areas). Sampling in this way is likely to miss risks associated with shallow placed deleterious made ground (e.g. ashy material, construction and demolition wastes etc.).

Sampling in this way-, and failing to provide any context or interpretive text to support the lab results-, suggests that samples may not have been collected by suitably qualified persons, which may in turn raise questions regarding sample handling procedures.

## *Results*

Some elevated results are apparent in the results, as was expected, but it is acknowledged that no results are of particular concern.

Notably absent are a TPH screen, and in particular given the content of the pre-demolition asbestos survey, an ACM screen.

## *Conclusions*

The submitted documents do not attempt to interpret results further than a direct comparison with previously submitted generic screening criteria (GAC). It should be noted that even comparisons to GAC are context dependent, and results presented in isolation (such as these) could be misleading, with potential to significantly under-represent 'real' risk. I am not suggesting that there *is cause* for significant concern, only that the submission comes with substantial uncertainties.

I have consulted the previously submitted desk-based information & the demolition plan. It would appear that the phase 1 area (as defined in the plan submitted under this discharge of condition application) is a relatively low risk area of the site.

It is not clear from historic mapping whether the chalets to be retained represent those constructed <1938, or whether these were demolished & re-built prior to 1969. At least one new chalet was constructed >1938, and prior to 1969. Construction and demolition waste derived made soils are a principle source risk – particularly in respect of asbestos

The asbestos survey previously submitted does not provide a site-level overview plan to identify structures surveyed, so there is little useful anecdotal information to consider the potential risk of ACM presence.

Taken at face value, the results presented are not of concern. They do omit data in relation to a principle exposure risk, and the likelihood of it's presence (or otherwise) is unknown. It is acknowledged that work has probably progressed on site, disturbing ground and possibly relocating soils.

It is probably not proportional to seek the involvement of planning enforcement in respect of the works stated to have commenced without first seeking discharge of the pre-commencement condition c.12.

It is similarly considered disproportionate to require a properly documented post-construction-works re-investigation to confirm the low risk indicated by the submitted samples. This is largely due to the expected low source risk attributable to this specific area of the site, and it cannot be assumed that a similar approach would be taken on future phases where condition discharge is handled in this way.

I would *support a discharge of c.12 in full on a spatial basis, relating only to the area indicated on plan no. 4356-500-ph1 (Sept-19) identified by the 'red-dashed-hatch' mark-up.*

For the benefit of the applicant however, I will expect submissions for future phases to;

- Be unambiguously prepared by competent persons (as required by c.12)
- To include a clear plan identifying the approximate positions of trial holes, with each assigned a unique reference number corresponding to all related records for each location.
- Document trial holes dug to a minimum depth of between 3-500mm, with soils encountered described on a formal log (or at an absolute minimum, clearly photographed & referenced).
- Sample soil (where taken as a bulk / disturbed samples) from >0.15m depth.
- Document fieldwork in some form of interpretive report which draws reasoned conclusions that describe the results in the context of the conceptual site model, and makes recommendations for appropriate next steps (this may include 'no further sampling or assessment necessary')

**Mr. Jonathan Driver**  
Environmental Control Officer