

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/20/01781	Your Ref:	APP/18/00450
EH Case Officer Extn:	44 6677	Date:	27 July 2020
DC Case Officer:	Lewis Oliver		
DC Case Officer Extn:	44 6263		
Application Number:	APP/18/00450		
Site Address:	Land at Forty Acre Farm, Havant Road, Havant		
Proposed Development:	Erection of 320 dwellings (including a 30% provision of affordable homes), 66 bed care home, provision of public open space, habitat mitigation zone, allotments, closure of existing access and creation of 2 new access points and associated infrastructure following demolition of existing buildings (approved 17.1.2020). Request to discharge condition no's 3, 4, 5, 6, 7, 8, 10, 11, 15, 16, 21 and 23 (Rec'd 23.1.2020). Reconsultation Request - Condition 10: Materials Management Plan.		

Observations / Comments:

I have reviewed the revised MMP support document (Ref J16120 Issue No 4) alongside my prior comments. Key Points are summarised below. These comments should be read alongside the initial consultation response (CONS/20/00249, 25/02/2020)

- **EH Comment** *"It is not entirely clear that the submitted documentation is actually intended to comprise the Materials Management Plan (MMP) required by c.10".*
Response - Wilson Bailey has confirmed that the document is referenced as a 'MMP Support Document' rather than (just-) 'MMP', because it supports the MMP declaration to the EA and CL:AIRE under the Definition of Waste Code of Practice. The MMP declaration is not a 'plan' (does not necessarily require a documented plan, acceptability is weighted more heavily on what happened, not planning what will happen), and for this reason the support doc comprises 'the MMP', for the purposes of c.11.
- **EH Comment** *"...just leaving details of the means of recording materials movement / placement, and the control of representative soil samples as documents that I have been unable to review. It is recommended that these be sought prior to approving the discharge of c.10, for completeness."*
Response – comment referred to the 'copy of the tracking sheet' and 'copy of the sample control sheet' referred to at section 7.0. These documents are not appended to the revised plan.
- **EH Comment** *"The supporting document recommends a sampling rate of 1 representative sample per 500 cu.M & in addition, 1 representative 'as placed' sample per compacted layer of 1000 sq.M in plan area" "...it may be prudent to confirm with the*

applicant that the above-referenced interpretation of the supporting document wording does indeed represent the intended level of sampling, and not a typographical error...

Response – While contrary to the content of informal discussions with Wilson Bailey, the wording referenced has survived 3 re-drafts of the MMP support document. For this reason, it may be assumed that the above interpretation is the intended & proposed sampling rate.

- **EH Comment** *“As regards criteria for chemical suitability, I would reject the Aliphatic >C16 screening values as appropriate acceptance criteria”*

Response – Section 5.0 has reduced acceptable concentration criteria for Aliphatic >C16 compounds by an order of magnitude. While (depending on the source) ‘at maximum permitted specification’ (MPS) soils may give rise to complaints on amenity grounds (principally odour, also as visible sheens may arise on standing water if soils at MPS are placed thinly over poorly draining sub-grade-), the values proposed are acceptable from a human health / controlled waters risk perspective (the latter given very low solubility rates).

- **EH Comment** *“similarly challenge the specified value for Chromium, as available literature values place the value at around 1/3rd the quoted 3g/kg for Chromium III” “...I would require speciation”*

Response – Acceptability criteria for Chromium has been brought in line with the S4UL for a residential landuse scenario. This is acceptable.

- **EH Comment** *“In line with comments relating to c.10 above, I would recommend listing the MMP alongside the /c08 letter report as the approved verification plan relating to the area for which c.11 is being discharged.”* This comment is considered to remain valid/applicable.

I can support discharge of c.10 on the basis of the MMP support document (Ref J16120 Issue No 4).

Mr. Jonathan Driver
Environmental Control Officer