

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/18/02582	Your Ref:	APP/18/01297
EH Case Officer Extn:	44 6677	Date:	17 January 2019
DC Case Officer:	Daphney Haywood		
DC Case Officer Extn:	44 6513		
Application Number:	APP/18/01297		
Site Address:	Manor Oaks, Manor Road, Hayling Island, PO11 0QL		
Proposed Development:	Construction of 9No. three bed dwellings, following demolition of existing glasshouse, together with improved site access and associated vehicle parking.		
	I attach a copy of the above application that has been received under the Town and Country Planning Acts.		
	Any views you should wish to make should be returned to me no later than 11/01/2019		

Observations / Comments:

Comments here refer to contamination potential only. I have reviewed the Dig-Geotech Report on Desk Study and Preliminary Ground Investigation, the intrusive element comprising 2 no. trial pits, broadly advanced within the caravan storage area and in footprint of a former glasshouse (TP01 & TP02 respectively).

On the whole, the report is cautiously worded with respect to laboratory limits of detection, but essentially it is true to say that PAH, BTEX, and VOC compounds have not been identified, save for trace levels of Fluoranthene, Pyrene & B(b)F.

Oddly, the same caution is not applied to persistent organic pesticides, which the text indicates are absent, but laboratory results sheets indicate are present at trace levels (DDD & DDE), up to 70 ug/kg.

Metals results are not substantially elevated, but it is noted that both Pb and Zn are elevated in topsoils, indicating potential for the site to have been impacted to a degree by traditional paints (weathering of painted surfaces). The use of traditional (heavy metal, metallic, and arsenic based-) pesticides does not appear to be in evidence from the samples taken.

It is noted that the trial holes are free of made ground, and that both soil profiles show just a thin mantle of silty topsoil, only around 100mm in depth. It is likely that topsoil will be harvested from all areas of proposed hardstanding for placement in garden areas, and this makes this strata arguably of greatest interest.

It is notable that organochlorine compounds were found to be elevated within natural soils, and that topsoils were not subject to testing. It is also notable that the elevated compounds

(Zn, Pb, organochlorines) were associated not with the glasshouse footprint (as would be expected) but rather with the caravan storage area.

The report concludes quite pragmatically that the results are favourable but limited in scope. The conclusions are cautious of over-extrapolating these results to a risk judgement for the entire site, and further site investigation (concurrent with a detailed geotechnical assessment) is proposed.

I would tend to agree with this conclusion - TP02 results are favourable, but target just one of 4 large glasshouses, each of which could have been used in different ways, or constructed from different materials (or typically painted with different paints). It is not uncommon for significant Pb contamination to arise from a painted timber structure, and it is significant that the former glasshouses (removed) largely correspond with garden areas. The thin mantle of soils means that despite the extant glasshouse footprint corresponding with an area of hard-standing, in reality the soils are likely to be harvested for re-use in higher risk areas of the site.

The proposed scope of investigation appears to give good site coverage, but in reality only a very limited area will be subject to environmental sampling under those proposals, as the driver for the sampling is geotechnical, not environmental.

I would recommend that in addition, the works specifically seek to characterise the topsoil at the site, targeting in particular the footprints of the glasshouses, but also providing general coverage - it is known that trace levels of contaminants are associated with other areas of the site. This might comprise a shallow trail pit exercise, or perhaps even composite soil samples collected from multiple points within a sample 'zone'. It is considered that a primary aim should be to characterise the topsoil as a unit, as it appears likely that the material is likely to be harvested for re-placement within garden areas for amenity purposes.

In summary, the conclusions of the submitted report are agreed in principle, and I would concur that further intrusive works would be prudent. I would recommend suitable conditions be applied to any consent that you are minded to grant in respect of this application, suggested wording below:

Contamination (Standard – omitting EDS, based upon submitted EDS proposals) [1]

Prior to the commencement of any specific phase of development approved by this planning permission (other than demolition, site clearance, or any other date or stage in development as may be agreed in writing with the Local Planning Authority), an assessment of the nature and extent of contamination at the site, whether originating from within or outside the curtilage, shall be submitted to and approved in writing by the Local Planning Authority.

The assessment may comprise separate reports as appropriate, but shall be undertaken by competent persons and unless specifically excluded in writing by the Local Planning Authority, shall include;

- 1) *An intrusive site investigation based on the proposals outlined within the Dig-Geotech Report Ref: 667/R01 12/12/2018; to provide sufficient data and information to adequately identify & characterise any physical contamination on or affecting the site, and to inform an appropriate assessment of the risks to all identified receptors.*
- 2) *The results of an appropriate risk assessment based upon (1), and where unacceptable risks are identified, a Remediation Strategy that includes;*
 - *appropriately considered remedial objectives,*
 - *an appraisal of remedial &/or risk mitigation options, having due regard to sustainability, and;*
 - *clearly defined proposals for mitigation of the identified risks.*

- 3) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the Remediation Strategy (2) are complete, identifying any requirements for longer-term monitoring of pollutant linkages, maintenance of engineered mitigation measures, and arrangements for contingency action.

All elements shall be adhered to unless agreed in writing by the Local Planning Authority.

Reason: Having due regard to policies DM10 of the Havant Borough Adopted Core Strategy [2011] and DM17 of the Havant Borough Local Plan (Allocations) [2014], Preliminary reporting suggests that Contamination could be present at the site as a result of previous land uses (&/or activities) at the site that could pose a risk to future occupiers.

Verification (Standard) [2]

*Prior to the occupation of any relevant part of the permitted development, any verification report required in accordance with **condition [1]** shall be submitted to and approved in writing by the Local Planning Authority.*

The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan, and must demonstrate that site remediation criteria have been met. Where longer-term monitoring of pollutant linkages is identified as being necessary, the report shall clearly set out plans for monitoring, provision for maintenance, relevant triggers and contingency actions (a "long-term monitoring and maintenance plan").

The long-term monitoring and maintenance plan shall be implemented as approved.

Reason: Having due regard to policies DM10 of the Havant Borough Adopted Core Strategy [2011] and DM17 of the Havant Borough Local Plan (Allocations) [2014], Preliminary reporting suggests that Contamination could be present at the site as a result of previous land uses (&/or activities) at the site that could pose a risk to future occupiers.

Mr. Jonathan Driver
Environmental Control Officer