

**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/18/01122                                                                                                                                                                                                                                                                                                                       | <b>Your Ref:</b> | APP/15/00732               |
| <b>EH Case Officer Extn:</b> | 44 6677                                                                                                                                                                                                                                                                                                                             | <b>Date:</b>     | 02 July 2018               |
| <b>DC Case Officer:</b>      | Ms R Ballam                                                                                                                                                                                                                                                                                                                         |                  |                            |
| <b>DC Case Officer Extn:</b> | 44 6143                                                                                                                                                                                                                                                                                                                             |                  |                            |
| <b>Application Number:</b>   | APP/15/00732                                                                                                                                                                                                                                                                                                                        |                  |                            |
| <b>Site Address:</b>         | Dunsbury Hill Farm, Park Lane, Cowplain, Waterloo, PO8                                                                                                                                                                                                                                                                              |                  |                            |
| <b>Proposed Development:</b> | Variation of Condition B6 of Planning Permission APP/12/00338 to change the maximum B8 floorspace from 12,356 square metres (20%) to 18,534 square metres (30%)<br><b>Request to discharge Condition A11 (Environmental Management During Construction), A14 (Contaminated land – scheme), B10 (Drainage Plans and Information)</b> |                  |                            |

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**Observations / Comments:**

I have reviewed the submitted documents in relation to the above referenced conditions. It is understood that the scope of the application (the scope of discharge of conditions) is limited to Plot 3A & 3B.

*A11 - CEMP*

The plan submitted appears to be a comprehensive generic CEMP which would be applicable to the whole site. Provision is made for both high sensitivity & high areas of the wider site, and is recognised that not all provisions will be relevant to Plot 3.

I have no adverse comments to make in respect of the plan - the measures detailed for the prevention of pollutant releases, identification, interception & containment are appropriate. Measures outlined adequately address all forms of nuisance, and if observed, render the site construction activities unlikely to result in complaints or any significant adverse environmental impact.

I see no material reason why the plan could not be taken to satisfy the requirements of A11 site-wide. In any event, I have no objections to the discharge of condition no. A11 insofar as it relates to Plot 3.

*B10 - drainage strategy (Plot 3)*

The drainage strategy for Plot 3 appears to segregate different areas of the site which could be broadly characterised as 'near building hardstand' (operational-, loading & deliveries) area, and 'away from building (overflow) parking'. 2no. interceptor units are proposed for each of Plot 3A & 3B areas, which is an unusual provision. It is possible that rationale for segregation

of drained areas and the duplicated interceptor provision is driven by the presence of the High Pressure gas main, and its related easement (as regards requirements for the laying of services).

It would appear to me that there is scope for 'consolidation' of the drainage strategy - but this is a design consideration driven by factors which may not be immediately obvious from the application documents. In terms of pollution control provision - draining both low & moderate risk areas of the site via bypass interceptor to a substantial off-plot attenuation pond (and onward via flow control device to the Hermitage) is an inherently low risk SuDS. Discharge to the pond serves to maximise natural surveillance, and consequently the likelihood that a pollution incident which has overwhelmed the capacity of one of the interceptor units will be identified, and can be contained upstream of the flow control device and upstream of the main river.

It is understood that LLFA &/or EA has previously agreed the site-wide solution from a 'permissible runoff rate' & 'localised / downstream flooding' perspectives.

The indicative plans included in the submission are too low a resolution to be fully legible, and it is not clear whether the interceptor units have been specified (manufacturer, model, capacity). It is however considered reasonable to assume that the selection of bypass interceptor unit will appropriately account for drained impermeable area, and I don't believe it should be a barrier to discharge of the condition that these details have not at this stage been confirmed. The principle of the drainage network function, and position / duty of the interceptors is considered to be the critical factor for approval. For the benefit of the applicant, it is expected that interceptor sizing will account for the roof area of the building for plot 3A in its consideration of drained area (Plot 3A roofwater does not appear to bypass the interceptor as it does for the siphonic system proposed for Plot 3B).

In this way, I have no adverse comment as regards the discharge of B10 insofar as it relates to Plot 3.

#### *A14 - Contamination*

The Ridge Ground Condition Assessment covers the entire 'Phase 1' area, detailing results from some 25 drilled trial holes, to confirm Environmental Desk Study preliminary assessment concluding 'no significant sources likely to be present on site'. Some 30 trial pits are indicated on drawing No. 5002713 - SIL01, three of which within the curtilage of Plot 3. The report does not include logs for the trial pits, nor any sampling or details of visual inspection or screening of soils encountered. The purpose of the pits is unclear, as is their omission from the report. The site history does not (however) indicate that omitted details from trial holes should be regarded with scepticism.

Largely, the logs indicate very little significant visual & olfactory evidence of contamination. Chemical sampling concurs, with the majority of samples returning values either below residential generic assessment criteria (GAC), or below the limit of detection (LoD) - indicating a generally low-negligible contamination risk.

Substantially elevated concentrations of Copper & Zinc (relative to background) were identified in a trial hole within Plot 3 (BH517; 1.2 g/kg & 0.98g/kg respectively). Having very low human toxicity, these values are not of concern per-se, however with only 6 no. non-targeted trial holes accounting for an aggregate 'plan' area of probably <0.2 sq.m (referring to plot 3), the probability of encountering a highly localised deposit of contaminated soil was relatively low. That the investigation did identify soils impacted by anthropogenic contamination is an indication that a deposit of contaminated soil may be present within near-surface soils at the site. Copper & Zinc are associated with agricultural herbicides & fungicides, and could have resulted from former agricultural use. Alternative sources might be 'present in imported soils', as a result of local waste disposal (e.g. by burning), or (a low-probability encounter of a localised deposit)

associated with recent construction activity. The trail hole is also associated with some biological degradation processes, displaying elevated CO<sub>2</sub> and depleted O<sub>2</sub> in the indicative gas screening.

The low sensitivity of the site to these phytotoxic metals, the low gas flow rate at BH517, and robustness of the contamination discovery strategy (reinforced by the provisions of the CEMP), makes it reasonable to rely upon visual inspection of soils as construction works progress, rather than requiring a proactive pre-commencement investigation of this apparent outlier.

As regards the remainder of the site, I note that generally contamination was not encountered, and made ground sampled did not appear to be significantly contaminated.

Gas monitoring results across the site were however of potential concern, with flow rates up to 2 l/hr, and methane concentrations of up to 3.7% by volume. CO<sub>2</sub> is also elevated in a number of wells, and oxygen is as low cf. typical 50% atmospheric values; indicating a local BoD/CoD associated with a biological degradation- or chemical oxidation- process. This process could be natural (associated with alluvial deposits), or could be associated with one of the suspected areas of fill ('13/3', or '13/3 FHA17'; both outside of the investigated area, '13/3 HFA17' being located with the 'Phase 2' DHF extension area).

The report highlights that groundwater was so shallow in some trial holes at the time of monitoring as to have completely flooding the well screening (the well response zone). Groundwater levels were not recorded however, nor were notes kept as to which wells had standing levels above the well screen. This information hampers interpretation as regards both the concentrations recorded, and the flow rates which are critical to the degree of associated risk. The report notes that results for all holes should be regarded as 'unrepresentative', and recommends additional rounds of gas monitoring to obtain results from across the site.

I would agree that this is prudent, given the slight ambiguity over which results could be deemed representative, and given that the elevated Methane at BH512 & 513 in particular was not associated with any organic material encountered during the drilling of those trial holes (i.e. indicative of gas migration from elsewhere, non-local to the trial holes).

I would recommend (therefore) that A14 remain a 'live' condition for the wider site, pending the completion & reporting of further rounds of gas monitoring.

Ideally, further gas samples should be analysed from BH515-517 (Plot 3) prior to their being destroyed by site works. This would lend confidence to the preliminary results from the Ridge Report, and would provide the opportunity to incorporate basic gas protection/mitigation in critical areas (e.g. below ground service voids etc.).

The submitted report is dated May 2017, so further gas monitoring results may already be available. Whilst I am reasonably content that ground gas will not prove to be a significant issue for Plot 3, the plot is closer to filled land feature '13/3' than both trial holes numbered BH512 & BH513, and in the event that the fill, rather than the alluvium, represents the 'non local gassing feature', this site could in principle be at greater risk than other areas.

I would recommend that we seek to establish (within the life of this application) whether further gas monitoring data is available to quantify this somewhat uncertain risk. Availability of this information could be material to the recommendation with respect to A14.

**Mr. Jonathan Driver**  
Environmental Control Officer