

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/16/01423	Your Ref:	APP/14/00863
EH Case Officer Extn:	44 6677	Date:	28 June 2017
DC Case Officer:	Simon Kennedy		
DC Case Officer Extn:	44 6138		
Application Number:	APP/14/00863		
Site Address:	Land adjacent to Eastleigh Cottages, Bartons Road, Havant		
Proposed Development:	Demolition of existing buildings and erection of 55 dwellings; comprising 6No. 2 bed flats; 9 No. 2 bed houses; 33No. 3 bed houses; 6No. 4 bed houses and 1No. 5 bed house; together with access, landscaping, car parking and open space. Felling of trees covered by TPO 1328. Joint application with Havant Borough Council and East Hampshire District Council, Havant Borough Council is the Lead Authority. No current / live application.		

Condition 26 (Verification of Implementation of Remediation Method Statement)

Observations / Comments:

I have reviewed the Geo-Environmental Verification letter report ref GE15735/GR01/170515, submitted ahead of a formal application for discharge of condition number 26, which restricts occupation until related submissions have been approved by the LPA.

Principle of sign-off in relation to c.26

The scope of the letter report extends to plots 7-12 & 19-23 only. It is implicit that the applicant is likely to seek partial discharge of c.26 on a spatial basis, in order to permit occupation of units as & when they are completed.

I have no in-principal objection to this approach, on the assumption that the submitted information is sufficiently robust.

Verification Report - Plots 7-12 & 19-23

The level of detail provided in the verification report falls short of that expected. There is heavy reliance on declaration, and no photographic plates are provided in relation to some of the subject plots (e.g. 8, 11, 12, 20).

Notably, no verification of the chemical suitability of soils has been undertaken. The verification report makes no reference to any imported sub-soil or topsoil (for which sampling data or quality certification might be presented), and so it is assumed that all soils placed are site won.

No detailed information has been presented in respect of detailed materials management plan, which aimed to provide assurance and confidence in the quality of site won-soils through thorough spatial recording and tight stockpile management practices. Similarly, no records of exports from the site of excavated (contamination impacted) made ground are presented within the report, so it must also be assumed that such material has been retained on the site for placement in low risk areas (e.g. under footpaths, etc.).

In the absence of either plot-by-plot soil quality sampling, or the detailed batch excavation location-, appropriate stockpiling-, and detailed placement- records; there is little assurance (other than the declarations included within the report) that material identified in the site investigation as being inappropriate for placement within garden areas has not inadvertently been placed above the barrier system as either sub-soil or topsoil.

It is not clear that the Geo-Environmental oversaw materials movement, and it would appear to be implicit that they did not. In this way, it is likely that reliance was placed upon non-specialist groundworks staff to implement the complex materials management plan, again, eroding confidence in it's robustness.

It is acknowledged that for the plots photographed, the achieved cover depth appears to have broadly met the target thickness, where shown, barriers are in place, in good condition, and of appropriate material, and that the placed soils appear to be largely clean (free of staining & inclusions, if perhaps a little low on organic matter content). I am however reluctant to accept that this is sufficient evidence to demonstrate that the soils are of suitable quality - as for example, and perhaps in particular - elevated lead concentrations would not be readily apparent through visual & olfactory means.

In order to support discharge of c.26, I would recommend that either;

- Materials management records are provided (to include excavation locations, quantity, stockpiling information, and placement locations / quantity), as proposed, in relation to specified plots - or;
- That some plot sampling of topsoil & subsoil quality is undertaken to verify that soils are appropriate for the placement location. Spatially composite samples may be acceptable for this purpose, provided that each is limited to strata & plot (i.e. either from topsoil or sub-soil [not both] and each sample is of material obtained from a single plot). It is similarly that a sample density of <1/plot may be acceptable in the first instance (e.g. assuming no adverse results arise)

I don't believe that it would be possible to discharge c.26 for the specified plots on the strength of the submitted verification information.

Best Regards,

Mr. Jonathan Driver
Environmental Control Officer