

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/17/01761	Your Ref:	APP/15/00896
EH Case Officer Extn:	44 6677	Date:	15 September 2017
DC Case Officer:	Rachael McMurray		
DC Case Officer Extn:	44 6546		
Application Number:	APP/15/00896		
Site Address:	Land at 38-44 London Road, Purbrook, Waterlooville, PO7 5LJ		
Proposed Development:	Demolition of existing buildings and redevelopment to form 42No. retirement apartments for older persons including communal facilities, parking provision and associated landscaping; and 2No. commercial/retail units. (Approved 11.12.15). Request to discharge conditions 3, 5, 6, 7, 17 and 18 (15.08.17).		

Observations / Comments:

I have reviewed the supporting documentation with respect to condition no's 3, 5, 17 & 18. I note that the surface water drainage scheme does not incorporate any pollutant attenuation, but similarly acknowledge that the consented use is low risk. The LLFA are the appropriate consultee to comment on attenuation volumes and discharge rate. I have no adverse comments to make with regards to the drainage scheme / layout submitted.

I similarly agree the Knotweed treatment programme is likely to achieve it's objectives, and is a pragmatic approach which is compatible with the principles of sustainability.

The Geotechnical report submitted in support of a discharge of condition no. 3 is however insufficient to meet the aims of the condition quoted (below)

"The results of an appropriate risk assessment based upon (1) & (2), 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. "*

As this consent was granted on appeal, I do not have access to a copy of the decision notice to confirm whether the text above is simply an element of c.3, or whether it represents the condition in it's entirety. I will assume the former, as the wording above is disjoint in the absence of a requirement to undertake mitigation, and demonstrate adequacy of mitigation measures proposed & undertaken.

In either event, the stated purpose and scope of the report is simply to inform the pile design for construction on soils with volume change potential.

The report does contain information relevant to a contamination assessment, and where this is the case, the report is favourable. The borehole logs identify made ground to 1.2m below ground level, and do not note any visual or olfactory evidence of contamination. Samples taken from made ground show only marginal elevation of metallic contaminants, and hydrocarbons (TPH CWG, PAH16 + Cororoene, and BTEX) generally below limits of detection.

This is however at odds with the 2015 Crossfield report (on the basis of which Environmental Health required a scheme of further assessment, remediation or mitigation).

The chemical testing data submitted within the ACS report (standard Waste Acceptance Criteria test) is limited (two samples only, from three trail hold positions), and the trail holes were positioned without regard to either contamination sources or locations of exposure within the completed development. In this way, the Crossfield report is considered to be more representative of soil contamination conditions.

I would object to the discharge of condition 3 (even in part) on the basis that the ACS report authored with a brief to address the requirements of this condition (e.g., the report does not include a contamination risk assessment of any kind).

Mr. Jonathan Driver
Environmental Control Officer