

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	DCS/EH/JPD/130725001	Your Ref:	[As Application Ref:]
Ext. No:	6677	Date:	13/07/2013

DC Case Officer: Richard Nash
Application Number: APP/13/00683
Site Address: 14A Tournerbury Lane, Hayling Island, PO11 9DH
Proposed Development: Replacement of single storey workshop. (Revision to Planning Permission APP/11/01265).

Observations / Comments:

Land Contamination

I previously reviewed the 11/01265 application, and provided comments via a single consultation response provided by Mike Smith. This was based upon a site assessment, and little guidance was provided on required scope.

The basic premise of my previous response remains valid, and I would re-iterate that I do not object to these proposals in principle. If Development Control are minded to grant consent for this revised scheme, I would like to take this opportunity to make a small amendment to the condition applied to the 11/01265 consent for the purpose of clarity; and additionally to provide some comment on required scope, which you may find useful to provide to the applicant as an informative.

Condition 1

Prior to the commencement of the development approved by this Planning Permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), a scheme to deal with the risks associated with contamination of the site shall be submitted to and approved in writing by the Local Planning Authority. That scheme shall include all of the following elements unless specifically excluded, in writing by the Local Planning Authority.

1. A desk study identifying:

- All previous uses
- potential contaminants associated with those uses.
- a conceptual model of the site indicating sources, pathways and receptors
- potentially unacceptable risks arising from contamination at the site.

2. A site investigation scheme based on (1) for the purpose of informing an appropriate assessment of the risks to all receptors that may be affected, including those off site.

3. *The results of the site investigation and risk assessment (2) and if appropriate, a method statement based on these results giving full details of the remediation measures required and how they are to be undertaken.*

4. *A verification report or statement shall be prepared (as appropriate) on completion of the works set out in (3) [if any], confirming the remediation measures that have been undertaken in accordance with the method statement and setting out any measures necessary for maintenance, further monitoring and reporting.*

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

Reason: *To prevent future site users, and occupants of adjacent residential properties being exposed to unacceptable risks from contamination' and mitigate the effects of contaminants in, on, or under the ground (as the site may be contaminated due to previous land uses); and having due regard to policies and proposals E1 of the Hampshire County Structure plan 1996-2011 (Review), and DM10 of the Havant Borough Adopted Core Strategy (2011), and DM17 of the Draft Local Plan (Allocations) 2012*

I am mindful that the proposals do not represent a comprehensive redevelopment of the site in its entirety, and similarly that the proposed end-use is of a commercial nature. Whilst it remains appropriate to quantify the degree of risk associated with the use of the site to date, Investigation & reporting should be proportional to the scale of the development.

An intrusive investigation needn't (for example) seek to directly investigate land beneath existing hardstanding & structures to be retained (i.e. not forming part of this application). It may be beneficial however for a desk study & site walkover to include all units on the site, in order to inform consultation responses from Environmental Health to any future development control applications.

Given the lack of groundwater sensitivity previously noted in this area, it is envisaged that intrusive investigation could consist of trial-pits of <2.0m depth, and could be undertaken in conjunction with excavations undertaken for geotechnical purposes, provided the locations are suitable to target any features of interest identified by means of the desk study.

From the condition above "appropriate assessment of risks" (2.) would include a qualitative assessment (screening) using published values, such as ATRisk SSV's or similar; more detailed assessment would only be necessary following adverse screening results.

Not all elements of the condition necessarily require a written report, instead, it is intended that an iterative assessment process is undertaken, which will be deemed to be complete where it is demonstrated that either no sources are likely to exist on site, sources have not resulted in significant contamination, or that there is no pathway between an identified source and sensitive receptor (etc.); if none of these outcomes can be demonstrated, then remedial actions may be necessary, and all elements of the condition are likely to be required.

The applicant is advised to contact Environmental Health to informally discuss the scope of required works in order to avoid delays or expense.

Best Regards,



Jonathan Driver
Environmental Control Officer