

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/16/01596	Your Ref:	APP/16/01100
EH Case Officer Extn:	44 6677	Date:	28 November 2016
DC Case Officer:	David Eaves		
DC Case Officer Extn:	44 6549		
Application Number:	APP/16/01100		
Site Address:	32 New Lane, Havant, PO9 2NG		
Proposed Development:	Extension of existing site security offices to form new reception area and ancillaries.		

Observations / Comments:

I have reviewed the Design & Access statement and scope of proposals. I note that the applicant considers that the area of the site currently occupied by the site security office (and the subject of this application) to be uncontaminated. I agree that the proposed use will not contribute to contamination of soils within the wider site.

I am aware that the site has previously been subject to some intrusive investigations, and in this way the applicant's statement in respect of this area of the site may well be based upon sound empirical data - as a part of this consultation I have not sought out a copy of the 1997 ground contamination report for detailed review in order to determine whether this is likely to be the case (or not).

I note that whilst the plot of land immediately south of the application site is currently in use as a car park, it was formerly occupied by a production building. Similarly, whilst building V (subject of GEN/16/01061) is currently in use for staff welfare & offices, it previously represented an operational production area. The application site falls between these two areas of the site, both holding the potential for contamination. The geology of this site could be variable, being marked as both Head (Gravelly) & River Terrace Deposits (Sandy), assumed to have potential for contaminant migration.

Previous investigations undertaken within the wider site area are understood to have identified some elevated contaminants. The site is relatively large, and geology has the potential to preferentially transmit contamination within soils / groundwater - in turn meaning that contamination has the potential to be found at high concentrations in unexpected areas of the site (e.g. confined within 'veins', or 'lenses' of sandy or gravelly material etc.). The industrial context of the site is noted, as is the distances to nearest receptors - I've previously provided an overview of the perceived sensitivity of the site under GEN/16/01061, and those comments remain valid.

In the context of these proposals, it is acknowledged that the extension is of relatively small scale, with the completed building totaling less than 250 sq.m Given that the local superficial geology is expected to (relatively) readily transmit groundwater (and by extension, certain

contaminants); and considering the relatively limited floorplan of the structure - it is not considered that the proposed building will represent a significant impediment to any future remedial works that could be deemed to be necessary in future. In this way, it is not reasonable to require a proactive site investigation to confirm ground conditions prior to development.

As previously noted, there is both potential for soils at this site to be effected by a degree of contamination, and potential for migration of contamination over significant distances (if gross contamination is present). In terms of proximity to contamination sensitive receptors, the environmental context of the site is however one where contamination would likely need to be severe if it is to be regarded as being likely to materially impact either a sensitive off-site receptor, or an employee of Pfizer under an occupational exposure scenario, to a significant degree..

In this way (and in the context of this development, being of limited scale, as noted above-), we need only be concerned about contamination which is severe; in turn likely to be readily identifiable by visual & olfactory means (odour, texture, colour and general appearance of soils & groundwater). Accounting for the context of the site (notes above), there is a small risk of encountering contamination during groundworks associated with this development.

It may not be reasonable to leave in place any contamination encountered (that is readily identified by visual / olfactory means), and therefore if encountered, Havant Borough Council should be notified, soils should be tested to quantify the degree of risk, and where unacceptable risks exist, appropriate remedial actions should be taken & verified.

I have no objections to this application, but would recommend the inclusion of the following condition in order to ensure that any gross contamination encountered is appropriately dealt with;

Condition 1; Watching Brief / Unexpected Contamination

"In the event that suspected contamination (soil, groundwater or buried waste materials) is encountered during groundwork; works in affected areas of the site shall cease until a scheme to deal with the risks associated with the suspected contamination has been submitted to and approved in writing by the Local Planning Authority.

The scheme may comprise separate reports/statements as appropriate, but unless specifically excluded in writing by the Local Planning Authority, shall include;

- 1) Investigation in the vicinity of suspected contamination, sufficient to characterise its nature, likely extent & mobility,*
- 2) An appropriate assessment of the risks to all receptors that may be affected, based upon 1), and;*
- 3) Where potentially unacceptable risks are identified by 2), a Remediation Strategy that includes appropriately considered remedial objectives and clearly defined proposals for achieving these, having due regard to sustainability*

All assessments, works, monitoring & other actions required by 1)-3) above (and B, below) shall be undertaken by competent persons, and the scheme shall be implemented as approved.

Prior to the occupation of any relevant part of the permitted development, EITHER of the following shall be submitted to the Local Planning Authority;

- A. A statement confirming that no suspected contamination was identified during development, OR;*
- B. Documentation in accordance with 1)-3) above; together with a Verification Report (where appropriate) demonstrating that remediation objectives have been met.*

Reason: Having due regard to policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and

the National Planning Policy Framework, there is a potential for contamination to exist at the site within made ground which could pose a risk to occupants"

Note that this is not a pre-commencement condition, and no assessment works need be undertaken, nor submissions made (other than the confirmation mentioned in "A") unless suspected contamination is encountered.

Best Regards,

Jonathan Driver
Environmental Control Officer