

Havant Borough Council
Development Control
Civic Offices
Civic Centre Road
Havant
Hampshire
PO9 2AX

Our ref: HA/2021/123019/03
Your ref: APP/21/00189
Date: 17 August 2021

Dear Sir or Madam,

OUTLINE APPLICATION FOR THE DEVELOPMENT OF NEW EMPLOYMENT UNITS TO PROVIDE UP TO 29,000 SQ M (GROSS INTERNAL AREA) FOR FLEXIBLE USE ACROSS USE CLASSES E (LIGHT INDUSTRIAL), B2 AND B8 WITH ANCILLARY OFFICES, CAR PARKING, SERVICE YARDS, DRAINAGE WORKS, LANDSCAPING AND ASSOCIATED WORKS TO PREPARE THE SITE FOR DEVELOPMENT. ALL MATTERS ARE RESERVED EXCEPT THE PRIMARY MEANS OF ACCESS TO THE SITE.

BROCKHAMPTON WEST, HARTS FARM WAY, HAVANT.

Thank you for consulting us on the above application following the submission of additional documents.

We have reviewed the submitted Geo-environmental Assessment report (Former Brockhampton West Landfill, North of Harts Farm Way, Havant, DeltaSimons, July 2021, 19-2099.04) and provide comments relevant to the review of this document below. Please note that these comments are in addition to and an enhancement of our comments provided in our previous letter dated 22 June 2021 (our ref: HA/2021/123019/02). In particular, we would still recommend the inclusion of the conditions specified in our previous response in any planning permission granted. We note that the report does provide significant additional characterisation of the site. However, there are a number of potential issues in relation to risks to controlled water that we feel require additional assessment.

As per our earlier discussion with the Applicant regarding the site, we raised the following concern and this is cited in the report:

"The EA considers that the most significant controlled waters risk posed by the Site is the potential for lateral migration of contaminants, from the leachate/waste mass, to Langstone Harbour SAC. They required that this should be a key consideration of the investigation. The EA also expressed particular concern to the introduction of nitrogen species (such as ammonia) into the stream/Langstone Harbour."

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Cont/d..

We can confirm that the above remains our main concern, and we would seek that the Applicant provides relevant information at appropriate stages (such as when applying for the discharge of conditions) specifically in relation to this concern providing reassurance that appropriate assessments have been undertaken and suitable mitigations will be in place.

We would also wish to raise the following comments and observations on the wider report findings and conclusions:

- The conclusion in the report that there are 2 separate waste cells, each of which were filled at different times, does not seem unreasonable.
- We note that tidal fluctuations were observed in a number of boreholes in the chalk across the site. This, as acknowledged in the report, would seem to indicate a strong degree of potential connection between groundwater beneath the site and the surrounding surface water.
- With regards to the assessment of 2 separate groundwater levels in the waste mass and chalk aquifer, we would agree that some of the water levels observed may be perched water in the landfill mass. However, it is not clear if these perched water observations represent anything cohesive, or if they are multiple localised areas of perched water. As such it may be more accurate to say there may be multiple localised areas of perched groundwater in areas of the landfill mass.
- With regards to the monitoring of groundwater and surface water, we would raise the following points:
 - Given the location, the results of monitoring should also be compared against saline EQS.
 - Although Copper was elevated in some stream samples and in groundwater, when compared to the most stringent surface water EQS, we would accept the conclusion regarding the fact that this appeared to be more elevated upstream than downstream in the Hermitage Stream. Unless any additional evidence to the contrary emerges, we agree that the Copper could be primarily occurring in the stream from some offsite source. We would also agree that this could be natural.
 - Elevated hydrocarbon levels in a few locations in the chalk are a little concerning. We accept though that there is no evidence of widespread impact within the chalk, and no evidence of impact in the surface water. We also note that there is no clear point source that could be addressed. As such, we do not feel this warrants any further action. However, if during development a clear point source of hydrocarbons was encountered (for example, distinct oil drums) then potential further action should be discussed with ourselves. We have recommended a condition relating to unidentified contamination and trust this will be included in any planning permission granted.
 - There are comments indicating that elevated Nitrites were observed in the stream, but it has been assumed to be from offsite sources due to a lack of Nitrite being observed on site. Nitrites often occur as a transformation product from Ammonium in aerobic environments. There is as such a clear significant source of any observed Nitrites associated with this site. Therefore, any elevated Nitrites should be subject to further assessment.

- We remain concerned regarding the impact of Nitrogen species on the wider environment. We agree that the observation from the Hermitage Stream does indicate that there is significant attenuation of Ammonium. This may be both from dilution and oxidation. These may vary dependent of factors such as flow and temperature. However Nitrites, and the wider environmental loading from Nitrates, remain a concern.
- We agree that limiting infiltration will result in betterment. However, we do not feel that issues with the impact of Nitrogen species have been resolved satisfactorily. These may be having a significant impact on sensitive controlled water receptors. As such, as it currently stands additional betterment measures would appear to be required. Additional measures such as potentially reducing flow offsite through a sheet pile wall near the boundary with the Hermitage Stream should also be considered.
- We would also just highlight again that issues with managing landfill mass, if this requires excavation during groundworks, remains to be resolved. We note also that the eastern retaining wall will be based in landfill mass; as such some excavation here would almost certainly be required.

We would be grateful if the Applicant would provide a response to the comments and observations raised above for us to consider and provide further advice if necessary.

Yours faithfully,

Mrs Sophie Brown
Sustainable Places Planning Advisor

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