

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/16/01039	Your Ref:	APP/12/01233
EH Case Officer Extn:	44 6677	Date:	28 July 2016
DC Case Officer:	Simon Kennedy		
DC Case Officer Extn:	4138		
Application Number:	APP/12/01233		
Site Address:	St Andrews House 59-61 West Street, Havant, PO9 1LB		
Proposed Development:	Conversion of existing Henry Jones building to form 8No. flats (comprising 6No. 1 bed & 2No. 2 bed); demolition of remaining buildings and construction of 16No. 3 bed houses. (Approved 25.9.13). Request to Discharge Conditions 13 (parts 3 and 4), 14 and 19 (18.07.16).		

Observations / Comments:

I have reviewed the information submitted in support of this application, alongside assessments previously received, and related case-files. I have also sought & obtained several other pieces of information (reports, tickets, logs and photographs), which have also been reviewed.

Comments on Verification of Risk Mitigation Measures

Opportunities have been missed to verify all aspects of the scheme of remediation (previously informally approved, and formalised within the Feb 2016 RMS, Received July 2016). It has not been possible to formally document the removal of below ground storage tanks, the associated pipework, or any locally impacted soils in the vicinity of these features. Ground Investigation (South West) Ltd. (GISW), acting on behalf of the applicant, have confirmed that this was undertaken in connection with the demolition of above ground structures in June/July 2015. Transfer notes from the end of the demolition period note two loads of 'contaminated soils' removed from site (29/7/15, the only material so described) at the end of this period; interpreted as 'anecdotal supporting information' indicating that this work is likely to have been undertaken as stated.

Waste transfer notes submitted were of varying quality, and ultimately limited value in terms of documenting remedial activity at the site. GISW has clarified that references within the February RMS describing the "removal of in-situ Made Ground" were not intended to be interpreted as either a wholesale source removal exercise, nor that made ground was to be removed to full depth of proposed cover system (i.e. existing and finished ground levels were likely to be coincident). Rather, these references were intended to indicate that some consequential Made Ground removal was likely to be undertaken as dictated by design requirements for finished ground levels.

In this way, the degree of site betterment implied by removal of this deposited material (impacted by anthropogenic inclusions) should not be over-estimated. The transfer note record was insufficiently detailed to estimate the volume or depth of material removed, and it is consequentially assumed that Made Ground remains in-situ at the site that is characterised by elevated Lead, B(a)P, occasional Asbestos containing material fragments, and other marginally elevated PAH, Aromatic Hydrocarbons and Arsenic.

Notwithstanding the above, the barrier systems installed at the site considered to be of an appropriate specification to adequately separate future occupants of the completed development from contaminants present within the retained Made Ground. *Verification details for garden & communal soft landscaping clean cover systems (and imported topsoil) are accepted.*

The information submitted as verification of gas & hydrocarbon vapour barrier systems (protection of internal spaces within dwellings) has highlighted installation conditions that are likely to have been sub-optimal, where joint integrity might be expected to have a higher failure rate than would otherwise be achievable. The construction detailing and site cleanliness during installation does however appear to have been of a high standard. In consideration of the 'as built' construction details for both the raft foundations & ground bearing slab (former Henry Jones Building), and in the context of the degree of gas and vapour risks at the site; I consider that the *systems are likely to perform adequately to achieve an acceptable degree of protection.*

In respect of risks to groundwater (surface waters receptors, potable aquifer, and public water supply springs); the remedial strategy did not identify any specific provisions for mitigation of risk, citing previous site investigation documents not identifying a significant risk; though acknowledging that some (low solubility) hydrocarbon fractions were present within groundwater at levels which exceeded their respective (theoretical) solubility limits.

The presence of saturation conditions for some organic contaminants would suggest that groundwater quality is significantly impacted locally, but I would agree that there is no evidence of that contamination being widespread, or that a significant 'reservoir' of leachable contamination is likely to exist that could chronically impact controlled waters receptors to a significant degree.

Soil conditions at the site (within Made Ground, and within the typical range of groundwater movement) appear capable of contaminant attenuation, and of acting to significantly retard the migration of contaminants with groundwater.

It is accepted that the conditions encountered on site are such that a significant pathway between shallow made ground & the principal aquifer is not necessarily likely. I would agree that none of the various phases of investigation undertaken to date has identified a source of contamination representing a risk to the public supply that is both likely & significant. I am content that *no further mitigation is required in respect of groundwater risks.*

Conclusions

In line with the comments above, notwithstanding that both the management of contaminant mitigation measures and the documentation of works could have been more robust; I am able to support the formal discharge of parts 3 & 4 of c.13, and of c.14.

Mr. Jonathan Driver
Environmental Control Officer