

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/16/01423	Your Ref:	APP/14/00863
EH Case Officer Extn:	44 6677	Date:	07 October 2016
DC Case Officer:	Simon Kennedy		
DC Case Officer Extn:	138		
Application Number:	APP/14/00863		
Site Address:	Land adjacent to Eastleigh Cottages, Bartons Road, Havant		
Proposed Development:	Demolition of existing buildings and erection of 55 dwellings; Joint application with Havant Borough Council and East Hampshire District Council. Lead Authority; Havant Borough Council. Request to Discharge Request to Discharge Condition No. 24 (29.09.16).		

Observations / Comments:

I have reviewed the revised Remediation Method Statement (Geo-Environmental GE15735-RMS-SEP16 Rev 1.1), representing an update on the Rev 1.0 version previously reviewed.

Changes are noted to be relatively minor, comprising some revised statistical assessments, and revisions to the topsoil specification in response to comments made previously by Environmental Health.

It should be noted that the revised RMS submitted should be read in conjunction with the Geo-Environmental Revised Contamination Assessment Letter Report Ref: GE15735/JT01/160729, as well as the levels and soil sample depth summary Ref: GE15735 v 1.1 09/09/2016), not submitted with this application, but previously reviewed by Environmental Health.

Summary

The revised documentation is broadly in line with expectation. It is considered that the revised assessment has demonstrated that there is no significant concern regarding severe or gross contamination of general made ground, or hot-spot's of impacted material at the site. The additional assessment has nevertheless demonstrated a contamination impact in respect of which is reasonable to conclude that soils in some areas are likely to be unsuitable for use in garden areas (due to non-negligible health impacts associated with chronic exposure). In this way I now agree that the remediation strategy previously submitted both has merit, and is adequately supported by empirical data.

I therefore agree that all elements of condition no. 24 have now been met, and would support the formal discharge of this condition in full.

Clarifications & Working Assumptions

The summary (above) confirms broad agreement of the remediation method statement, verification plan and watching brief, such that commencement can now be formally permitted, regularising the preparatory works that are already underway at the site.

The watching brief is to be executed under condition no. 25, and the verification plan reported under condition no. 26 prior to occupation.

In the interests of efficiency when dealing with future applications to discharge these conditions, it is considered worthwhile to clarify the expectations of Environmental Health - in some cases this amounts to a clarification of comments previously made (for the avoidance of doubt).

1) In light of the larger than expected deposit of asbestos containing materials in the North Eastern portion of the site, and the identification of asbestos elsewhere at the site; there is a need for a robust discovery strategy. I expect verification reporting to include a detailed summary of actions taken (in pursuit of identifying contaminants, and upon discovery), alongside a clear declaration whether or not unexpected contamination is identified during groundworks. Evidence of any actions described (whether for remedial purposes, or as precautionary actions - e.g. stockpiling & sampling, photo's and sample results) should be provided.

2) As previously indicated, I consider that the successful implementation of the MMP is likely to prove challenging to evidence / demonstrate. In the event that robust materials stockpile characterisation and export / import / movement / placement logs cannot be maintained, it is likely to be acceptable to submit (in addition, or alternatively) an enhanced verification of cover systems, cover depths & topsoil quality 'as placed' - for example plot-by plot.

3) Previous comments made by myself in respect of topsoil amenity (aliphatic >C16 exceeding 7.6%) were unclear. The present soil quality criteria in principal permit (up to) >15% heavy oil content within garden topsoils (150g/kg); a proportion that is considered to be entirely unacceptable. I expect all soil specification criteria to be applied on a 'one-out, all out' basis, and for any average TPH ('Ali + Aro') values exceeding 0.25% (2500mg/kg) to be treated as being representative of potentially unacceptable material. Any (Ali >C16) max. values approaching the criteria outlined in Appendix C should be demonstrated to be not generally representative of placed material (i.e. additional material assessment would be expected).

Best Regards,

Mr. Jonathan Driver
Environmental Control Officer