

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/15/01581	Your Ref:	APP/15/01175
EH Case Officer Extn:	44 6677	Date:	30 October 2015
DC Case Officer:	Richard Nash		
DC Case Officer Extn:	44 6538		
Application Number:	APP/15/01175		
Site Address:	9-11 St Georges Walk, Waterlooville, PO7 7TU		
Proposed Development:	Discharge of Condition No/s 3 and 4(1) of Planning Permission APP/15/00420.		

Observations / Comments:

I have read the supporting information to this application, and have no comments to make in respect of condition 3.

I am able to support the partial discharge of condition 4 (discharge of 4 pt(1)) as applied for. I have no objection to the commencement of demolition & site clearance works, though the recommended pre-demolition asbestos survey should be undertaken before works commence.

The submitted documentation also provides information relevant to condition 4(2) & 4(3), recommending further work to ascertain the degree of risk posed by asbestos fragments identified in shallow made ground at the site. Some general comments on the Geo-Environmental Ground Investigation report (Ref; GE10739-GIR-JUN15, dated 17/06/2015) are provided below.

General

The intrusive investigation concluded 'no significant concentrations' of contaminants of concern, however it is noted that soils concentrations of lead, arsenic, and (to a lesser extent) zinc, are identified at concentrations significantly different from those that would normally be associated with natural soils.

One arsenic result exceeds the most stringent residential screening value (residential landuse with private garden & home veg consumption). Two (of Four) lead results exceeded the most stringent residential screening value by almost 400%, and statistical analysis shows the maximum values not to represent statistical outliers. The data is shown to be conform to a normal distribution, and the US95 (95th percentile, representative average) value is close to the maximum recorded (though due to the limited number of results, these conclusions should be treated with some caution).

The statistical results indicate that the lead concentrations identified could be representative of

the site soils (i.e. could be site-wide). All samples were collected from shallow made ground, and I would agree with the report that elevated concentrations are likely to be limited to this deposited material (made ground consisting of construction & demolition wastes, ash); though as suggested above, results indicate that the maximum values recorded could well be representative of this bulk material (ie.. site-wide) rather than a contamination 'hot-spot' of limited area.

Made Ground

Made ground was identified within all trial holes, generally to a depth of around 0.5m. WS6 however proved made ground to 1.0m below ground level - present to the base of the trial hole (i.e. maximum depth unknown). There could in places exist a non-trivial depth of material - notable given the mapping evidence to suggest significant level changes in the immediate vicinity of the site (levelling off of former embankments). the reason for the depth of made ground at the WS6 location is not discussed within the report, and is not clear from desk study information.

Soil Gas

I would tend to agree with the conclusions of the report with respect to the gas data collected - monitoring visits are limited, and no pressure-trend data is provided with the results to assist interpretation; however all trace gasses returned values below the limit of detection, and O2 depletion was within a range expected from natural soil processes (consumption by soil biota, COD of minor constituents in made ground) - O2 levels were below atmospheric averages, indicating that the results are not due to poor well construction. Positive flows recorded are considered likely to be due to atmospheric pressure. i have no ground gas concerns.

Groundwater

Although groundwater strikes were fairly consistent at 2.8-3.2m BGL (and WS5 being completed as a combined gas/groundwater monitoring well), no groundwater samples are presented. WAC testing on shallow soils from WS3 (refused well) were sampled, indicating no detectable lead (or other contaminants) within eluate. Initial concentrations within the parent material were however un-quantified, so this result could be due to low concentrations in these very shallow soils. I agree low controlled water risk, as the site overlies non-productive strata, and is some distance from the nearest watercourse (>600m, nearest main river line). No significant organics were identified in soils, so vapour release from contaminated groundwater is not likely to be a significant issue.

Risk Assessment

The report concludes some moderate / low risks to users / occupants / visitors to- adjacent land; references mitigation primarily in respect of dust controls during construction. The risk assessment excludes construction workers - CDM applies. This is agreed to be appropriate.

Asbestos & Report conclusions, Watching Brief

Asbestos fragments have been identified within the construction and demolition wastes, and the report concludes that further investigation is necessary to establish the ubiquity of this material within soils, and the degree of associated risk. It is assumed that this application relates only to condition 4(1) as a result of that recommendation - i.e. additional investigation required.

The proposed watching brief is agreed to be appropriate to the site & the scheme.

EH Conclusions

Following a review of the available data, it is concluded that this site could be considered to be contaminated land under a 'residential landuse with private gardens & home grown produce' scenario, on the basis of lead concentrations, and presence of asbestos within shallow soils. However, the consented scheme does not conform to this scenario. The consented scheme includes extensive hard-cover (buildings + pedestrian & vehicular access + parking areas), minimal (managed) soft landscaping, and includes single bedroom residential units on the ground floor, where occupant profiles are likely to be represented by adults. All these factors reduce likely risk.

In-house risk assessment calculations have indicated that over 99% exposure relevant to the 'residential exposure' scenario relates to direct exposures to soils. If this pathway is excluded, the residential screening values (for lead) increase dramatically. The proposed form of residential development, and it's likely occupant profile, are considered low risk in terms of contaminant exposure - not likely to be of particular concern in consideration of the proposed scheme & reported soil concentrations (arsenic, lead).

I am content to defer to the recommendations of the consultant - who I understand is recommending additional investigation & assessment. It would be useful for the record to receive the pre-demolition asbestos survey (& removal certification), and also the results of an additional round of ground investigation relating to the degree of asbestos containing material (ACM) & asbestos free fibres, within made ground.

I would however recommend that these works not be limited to any particular area of the site (the report implies that this work should be limited to the areas in the vicinity of the existing ACM 'finds'); and that additional CLEA Metals samples are taken at the same time, to inform future liabilities going forward regarding soil quality.

As is stands, any change of use of this site to a more sensitive landuse class may require remediation of soils - this could potentially have an affect (albeit not dramatic) on land values. Lenders willingness to secure finance upon the site may also be affected (this tends to vary by lender, and could be a more 'binary' response).

Collection of additional lead / arsenic results could significantly alter the statistical assessment with regards the 'representativeness' of values reported in the current report, and may avoid future assessment requirements if the site is re-developed again in future.



Mr. Jonathan Driver
Environmental Control Officer