

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/15/00717	Your Ref:	APP/15/00532
EH Case Officer Extn:	44 6677	Date:	12 June 2015
DC Case Officer:	Daphney Haywood		
DC Case Officer Extn:	44 6513		
Application Number:	APP/15/00532		
Site Address:	Interbridges Site, New Brighton Road, Emsworth		
Proposed Development:	Discharge of Condition No 31 of Planning Permission APP/10/00912.		

Observations / Comments:

I have reviewed the submitted information (Aviron Env. Summary 08-136.05 & Gas Risk Assessment 08-136.04) alongside the Phase 2 Geo-Environmental Risk Assessment (08-136.02) & previous comments from Environmental Health.

Environmental Health previously recommended discharge of c.20 of 07/54901/007 (under 08/54910/010) on the basis of the Phase 2 Geo-Environmental risk assessment, noting in relation to Chromium, minor exceedances of the most stringent (of a range of Ph [water hardness] dependent) environmental quality standards (EQS). These exceedances were not considered to be materially significant.

During the recent review of the phase 2 report, I have also noted exceedances of the EQS for dissolved copper within the one groundwater sample, and within leachate from one of the two WAC tests undertaken on soils. The least conservative EQS is exceeded from 275% to 750% (most stringent EQS exceeded by an order of magnitude), and recorded soils concentrations are approx. 3x the estimated value for the area & elevated above the national average background level for the principle domain (diffuse pollution). Soils concentrations are however well within the urban domain background levels (diffuse local inputs from construction, industry & transport that are not associated with a specific industrial process).

I note that there is no specific process or landuse previously associated with the site that would lead to an expectation that soils concentrations of copper should be elevated. These levels are consequently considered likely to be associated with proximity to transport infrastructure, and recent alluvial deposits.

Concentrations on site could potentially represent a theoretical risk to local controlled waters (secondary aquifer, River Ems) by contributing to general contaminant loading. However, in the absence of any specific likely site specific source (i.e. under the assumption that results are likely to be representative of local background concentrations influenced by diffuse anthropogenic activity), remediation of the site is unlikely to result in a material betterment of surface water through input reduction.

Whilst the copper concentrations were not considered in detail under the 08/54910/010, the overall conclusion & recommendations from that review are considered to remain valid, i.e. that discharge of the relevant condition was appropriate without further requirement for investigation, remediation or other risk mitigation.

The recent documents (environmental summary & gas risk assessment) present further soil gas monitoring information. The latest results have not captured similar oxygen depletion values to those previously recorded, and all CO₂ values remain below levels at which acute asphyxiant risks become non-trivial for enclosed spaces. Flow rates were zero for all monitoring events, and two monitoring events managed to capture low atmospheric pressure with falling trend to the sampling time (greatest chance of recording worst case gas flow rates).

The lack of recorded flow is indicative of low in-soil CO₂ generation rates, and of poor soil porosity. The distribution of concentrations across the site is broadly consistent, with increasing CO₂ with proximity to alluvium, nil-low (<LOD) flows, and no significant CH₄ or H₂S. Previous gas monitoring is consistent with the latest results, and all indications are that recorded levels are associated with natural sources - with associated acute risks to property or health & safety considered to be low-negligible.

The conclusions of the latest reports are agreed, and on the basis of the suite of Aviron assessments, I would recommend that c.31 be discharged in full.

Further recommendations

I refer to comments made under APP/15/00224 (memo dated 02/04/2015, our ref: CONS/15/00289) in relation to condition 20 of APP/10/00912, and the probable need to formally discharge it from the 00912 consent, despite it being previously discharged from 54901/007.

I can recommend discharge of c.20 (if required) on application - on the basis of the documents submitted in respect of this current application.

I still have not had sight of the Aviron Phase 1 Desk Study Report - I gather from the Nash & Partners cover letter that a copy is available, but that its file size was too large for the planning portal. In the interests of completeness, I would appreciate it if you could request a copy be sent via email, or made available by dropbox.

Best Regards,



Mr. Jonathan Driver
Environmental Control Officer