

HAVANT BOROUGH COUNCIL
Town & Country Planning Act 1990
Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	DCS/EH/JPD/140326001	Your Ref:	[As Application No.]
Ext. No:	446677	Date:	26/03/2014

<u>DC Case Officer:</u>	Mrs. Sally Smith
<u>Application Number:</u>	APP/14/01184
<u>Site Address:</u>	Development site at Portsdown Hill, West of Glebe Park Avenue & North of Bedhampton Hill, Havant
<u>Proposed Development:</u>	Discharge of Condition No's 2, 3, 5, 6, 7, 8, 11, 12, 13, 14, 15, 16 and 17 of Planning Permission APP/14/00232.

Observations / Comments:

Summary

No adverse comments Re: discharge of condition numbers 15, 16 or 17. No comments with respect to condition numbers 2, 3, 5, 6, 7, 8, 11 (specific documentation not reviewed).

General

I have reviewed the documentation submitted in support of this application. Condition numbers 12-16 are potentially relevant to Environmental Health. It is understood that Laurent Lemagnen has provided informal comments by email (dated 26/11/14) in respect of the Construction Management Plan (containing provisions relating to the protection of the local amenity for existing residents of the area – i.e. wheel washing, materials storage compound, hours of working etc., condition numbers 12 & 13), and in respect of lighting (condition 14).

Comments in this response therefore relate specifically to condition numbers 15 (Gas Monitoring), 16 (Verification of mitigation, if required) & condition 17 (UXO watching brief).

Condition 15 – Monitoring for Soil Gas (CH₄ & CO₂)

The Wilson Bailey letter report ref.:111145/DB/c05 dated 30/10/2014 has been reviewed. This document provides results from 2 rounds of spot monitoring. Wilson Bailey consider that the 'low atmospheric pressure' (990 mb) recorded at round 2 (14/02/2014) represents the 'most onerous' ground conditions for soil gas.

I consider that the absolute pressure is less significant than the combined effect of both the directional trend & rate of pressure change. Neither the trend nor a quantification of the rate of change is included with the presented results, and 990 mb does not represent an extreme low pressure event.

The monitoring undertaken has almost certainly not captured 'worst-case' conditions, however the results remain informative when considered in conjunction with the conceptual site model

With respect to the conceptual site model, the site is located 400m distant to domestic waste l/ fill (250m is typically considered to represent a moderate-high risk from gassing landfill), and it is known that this feature was managed as a dilute & disperse landfill (with permeable cover for a significant period, though thought likely impermeable now). In this way, the landfill is not thought to represent an exceptionally high gassing risk.

The geological bedding in the region is thought likely to be discontinuous with site, there is no extensive made ground on site (confirmed by trial pitting & borehole logs); but it is possible small scale (partial) fill could be associated with nearby quarry pits.

It is acknowledged that the availability of some empirical data does lend significantly more confidence to conclusions than assumptions based upon desk based information. The effectively random sampling (in line with comments above, results cannot be regarded as being representative of a worst case) has shown <LOD methane (CH₄) on two occasions, and some elevated CO₂ that is consistent between monitoring dates.

From the results, I have calculated a Gas screening as 0.00144 (Green on the traffic light system) – i.e. no protection necessary (rating assumes that results are representative as worst case). Acknowledging that the results are indicative, and insufficient to define the probable range of ground gas conditions at the site – I have also calculated some metrics that relate to the next risk level to determine whether these conditions are likely to be plausible. This has shown that in order for the site to be regarded as 'Amber 1', the maximum steady state flow rate would need to be recorded as 16.5 l/h, or CO₂ concentrations at >100% v/v at the maximum flow rate recorded (not possible).

Neither is considered to be plausible within the context of the CSM as it is understood, and further monitoring is not considered necessary on this basis.

With regards to the need for gas protection – the Wilson Bailey Report concludes that protection is not necessary on the basis that no significantly elevated (>5% CO₂, >1% CH₄) soil gases have been recorded, and that the proposed construction method is inherently low risk (permissive of dispersal of soil gas, reducing both the risk of ingress into property and the risk of concentration build-up in service voids). This is acknowledged & agreed.

The presented results are considered adequate for the purpose of condition 15. I consider that no further monitoring or gas mitigation is necessary.

I can therefore recommend discharge of condition 15 in full.

Condition 16 – Verification of Soil Gas Mitigation

Wilson Bailey has concluded that no gas protection measures are necessary, and in line with comments above, Environmental Health are in agreement.

As no mitigation measures are required, there is no need for verification. I can therefore recommend that condition 16 be discharged.

Condition 17 – Watching Brief for UXO/UXB

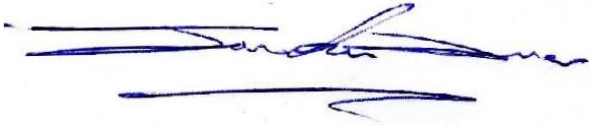
The intended scope of condition 17 was to raise awareness of the possibility of UXO/UXB being present at the site, and to propose a means of ensuring the groundworks proceed under an agreed 'watching brief' whereby there is an obligation on groundworks contractors / supervisors to be aware of historic ordnance, and have a procedure to work to if any suspicious items are uncovered.

The applicant has submitted a full & comprehensive UXO/UXB desk study & risk assessment. that concludes that the risk at the site is low. The report has been reviewed in detail, and I have no adverse comments to make. This report recommends toolbox talks to site workers, and notification (of the authors) if any items are discovered.

This is taken to constitute the 'watching brief' – i.e. the applicant will proceed on the basis of the recommendations of the report. It is not considered reasonable to require documentary evidence that works have progressed in this manner – it is implicit that the developer proposes to proceed as recommended.

On this basis I can recommend that condition 17 be discharged.

Best Regards,

A handwritten signature in blue ink, appearing to read 'Jonathan Driver', with a horizontal line underneath it.

Jonathan Driver
Environmental Control Officer