

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/15/00702	Your Ref:	APP/15/00484
EH Case Officer Extn:	44 6677	Date:	02 July 2015
DC Case Officer:	Sally Smith		
DC Case Officer Extn:	44 6522		
Application Number:	APP/15/00484		
Site Address:	2B Langstone Road, Havant, PO9 1SA		
Proposed Development:	Change of use from store to gym facility.		

Observations / Comments:

Following my previous consultation response, I have had opportunity to inspect the features at the site that were a cause for concern with respect to potential sources of local (on site) gross contamination, and would like to make an additional / updated response. Comments below will relate to features identified within the original response as being of concern, or subject to uncertainty.

Summary

Following the site visit, I have no objection to the current application, recommend no conditions in connection with the assessment of contamination risk.

Contamination cannot be entirely ruled out, and conditions may be appropriate for future schemes brought forward relating to this area of the site, or elsewhere within the wider technology park site.

Site inspection notes & additional comments

During the visit it was established that all storage facilities were subject to appropriate, well constructed secondary-containment that remains in good condition & apparently sound. There is no visual evidence of localised spillages, and the facilities & procedures for draining the bund areas appear to have been appropriate, demonstrating good environmental practice.

The operational period of the bulk fuel tanks was <25 years, well within the operational design life of tanks of this type - making containment failure less likely (especially when considered against the construction quality & condition of secondary containment). A similar conclusion can reasonably be reached with respect to the flammable (& other hazardous) chemical storage areas, which similarly benefited from secondary containment & other spill control measures.

It has also become clear that the building previously occupying land within the footprint of

Building 41 (southern end) was used for non-contaminating recreational purposes, and that the process previously undertaken within B41 was a relatively low risk industrial activity (production of de-ionized water) that has since been fully decommissioned. This process is unlikely to have involved use of persistent, volatile &/or toxic materials that would be of greatest relevance to general exposure under the proposed land use scenario.

Envirochem samples submitted confirm that liquids present within bunds, sumps, and other drainage / spill control features at the time of sampling are free from hazardous concentrations of contaminants. This would be expected however given both the throughput of rainwater (e.g. from open bunds) and the period of time since the fuel & flammables storage areas were last operational. Significant concentrations of determinands in the Envirochem samples would have been a cause for concern, but given the purpose of the features sampled, would not necessarily have been indicative of likely soil contamination. In this way, the Envirochem samples cannot be taken to relate directly to soil quality or likely levels of contamination exposure.

A degree of soil contamination associated with the storage & handling of potentially hazardous liquids within this area of the site cannot be entirely ruled out. It remains possible that contamination could have occurred, however contamination that is both significant & widespread is considered a low probability given the control measures in place, and the current condition of secondary containment structures.

Contamination associated with adjacent landuses (e.g. nearby plastics moulding) also remains a possibility, though it is accepted that the Council is not currently aware of any physical indication of contamination.

I understand that the requirement for intrusive groundworks under this application will be very limited, and so the probability of encountering contamination (if present) would be similarly low. I also understand that the property remains within the wider site freehold, simplifying any liability issues and being facilitative of action to appropriately deal with contamination in future if evidence of a significant contamination issue is subsequently identified.

The above factors are considered to be reduce the degree of risk associated with the potentially contaminating features in the vicinity of- & within- building 41.

Conclusions

The imposition of a precautionary requirement for site investigation is considered to be disproportionate for the current application for the following reasons:

- proposals relate to a commercial change of use (albeit with elevated sensitivity to contamination)
- delivery of the proposed scheme would not involve substantial groundworks, or removal of the existing building superstructure (i.e. there is no 'golden opportunity' to investigate & address possible/assumed contamination risk that would be difficult to access in future)
- Risk of release to environment of hazardous materials from the identified storage facilities on site is considered to be substantially lower than previously assumed
- Risk from industrial processes undertaken within building 41 is considered to be substantially lower than could have been the case under a 'worst-case' scenario (previous working assumption in the absence of specific information).

It is further considered that an environmental desk study or site environmental audit is unlikely to provide substantive new information in relation to risks at the site.

As outlined above however, while there are good reasons to suspect a lower risk from on-site sources than might have been previously expected, the risk of contamination cannot be entirely ruled out and it may therefore be appropriate to impose requirements to confirm (& if necessary, address) contamination risks in future - for example if this area of the site is to be comprehensively redeveloped.

I offer no adverse comment in relation to the current scheme.

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

Mr. Jonathan Driver
Environmental Control Officer