

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/15/00261	Your Ref:	APP/14/01296
EH Case Officer Extn:	44 6677	Date:	19 March 2015
DC Case Officer:	Sally Smith		
DC Case Officer Extn:	44 6522		
Application Number:	APP/14/01296		
Site Address:	Former Council Depot, Harts Farm Way, Havant		
Proposed Development:	Reserved Matters Application relating to Planning Permission APP/13/00592 for Plot 3 of new business and industrial development and associated discharge of conditions [3(i) the Reserved Matters: a, b, c and (ii), d, e, f, g, h, i, j, k, l, m, n, o, p, q, r, s, t, u, v, w] together with discharge of conditions 9, 11, 13 relating to the whole development site.		

Observations / Comments:

I have reviewed the applicaiton history & documentation submitted in support of this applicaiton. I have also reviewed the Envirionment Agency response to this consultation dated 16/03/2015.

Comments below refer to condition No.'s 9 (surface water drainage) and 11 (scheme of piled foundations [installation method statement]). I have not reviewed reserved matters or site travel plan, having previously concluded that the travel plan is not likely to be materially significant with respect to local air quality (though it is significant in terms of sustainability, carbon & transport aspirations & policy - these fall outside the remit of Environmental Health).

c9. Drainage

The Environment Agency has highlighted several areas where additional detain is required in order to support a formal discharge of c.9. I broadly agree with the Environment Agency's position, and have nothing specific to add.

c.11, Piling

The Environment Agency has indicated that insufficient information has been presented, pointing toward the need for a Piling Risk Assessment [PRA] (Table 3 of the 'Piling into Contaminated Sites' document [EA, Feb 2002] referenced in the response lists recommended content of a PRA).

The informaiton provided with this applicaiton (namely drawing no. 989.04 & 989.05) confirm the number and position of piles (.04), and the anticipated dimensions (diameter), section & construction (.05). It is not clear whether the phrase 'permanently steel cased drivle piles' refers

to a driven steel former creating a void for cast-in-situ piles, or hollow, closed/sealed pre-fabricated driven steel piles.

I assume, based upon the lack of specific information with regards pile depth (which is to be individually assessed, presumably on site), that the former (cast-in-situ) is likely.

It is similarly not entirely clear (therefore) whether the pre-fabricated steel pile / pile void former is entirely sealed at the driving end, or simply profiled to encourage lateral soil displacement.

The site does not fall within a source protection zone, however it does overlie a major aquifer characterised by high permeability / fracture flow. Superficial soils are also classified as having a high leaching potential (meaning that creation of preferential pathways might be significant).

Despite the site falling outside of the nearest SPZ1 (located ~250m to the North-east) the Agency clearly feels that a full piling risk assessment is required. In addition to the comments included in the Environment Agency response, I would also suggest that the applicant pay particular attention to Pollution scenario No's. 1 & 6 in particular, and consider the pile design installation depth alongside the proven (and if necessary, anticipated) geology.

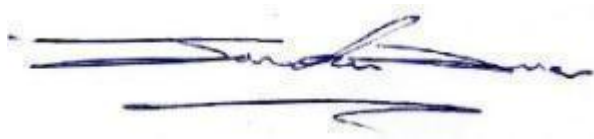
Driven piles carry a higher potential risk of contamination displacement, and creation of preferential migration pathways than do alternative methods. The potential for disturbance of aquifer materials (fines), causing them to enter high permeability fractures & create turbidity response at the spring abstractions is also higher with driven piles than for other methods. Condition 6 (contamination) has been formally discharged in relation to this site, however there remains requirements under the approved remediation method statement (RMS) for risk mitigation works, ongoing monitoring, and validation. The site cannot therefore be described as being 'unimpacted by contamination', and in the context of the groundwater sensitivity, consideration of the risks posed by the proposed foundation solution is considered to be both justified & reasonable.

I would not necessarily object to the use of the driven piles, however, I would agree that additional information is necessary - in particular confirmation of the founding strata, and a characterisation of the geological unit - and that this information should be considered alongside the current site conceptual model (in respect of geology & contamination).

On this basis I would object to the discharge of condition 11.

Other considerations

I would reiterate that whilst condition 6 has been formally discharged in respect of the outline consent, there remains a duty upon the developer to appropriately discharge the requirements, actions, and recommendations from the approved remediation method statement. Of particular relevance to the watching brief is the possible location of the bus cleaning & fuelling bay within the curtilage of Plot 3, possibly including fuel storage areas & interceptor units not identified by intrusive investigations undertaken to date.



Mr. Jonathan Driver
Environmental Control Officer