

Michelle Houghton

From: Sally Smith DC
Sent: 18 November 2014 10:13
To: bst shared
Cc: 'JLee@WINCHESTER.GOV.UK'; 'jwilson@winchester.gov.uk'
Subject: FW: Extra care MDA - Env Health response on Ground conditions report.

Please import into APP/14/00854 as additional Env Health response. For web.

Sally Smith
Senior Planner
Development Control
Havant Borough Council
Public Service Plaza
Havant
PO9 2AX

My working days are Monday, Tuesday and Thursday

Direct line: 0239 2446522
Fax: 0239 2446588
sally.smith.dc@havant.gov.uk
www.havant.gov.uk

From: Jonathan Driver
Sent: 17 November 2014 19:05
To: Sally Smith DC
Subject: FW: Extra care MDA

Sally,

As discussed, I've now been through the Soils Ltd. Phase 2 SI report (Ref:14512/GIR October 2014). I've also reviewed Alison's response (reproduced below). It might be useful for me to address the points raised by WCC as a starting point (I'll use the same point numbers for convenience) –

- 1) The report does make reference to the lack of a formal / site specific phase 1 report (environmental desk study), citing this as a reason why a conceptual site model (CSM) has not been presented within the report (as would ordinarily be expected). Whilst there is no formal CSM presented, the report does present an implied model, i.e. "unknown or unexpected contamination from a non-specific or general diffuse agricultural source being potentially present in upper soil layers (<1m BGL depth), with exposure of future site visitors / workers / occupants via usual Human Health pathways for respective age classes". As a conservative assessment, the report uses a residential risk class for determining exposure pathways and generic screening values (GAC's & C4SL's). I consider that whilst the development will be occupied by a sensitive class of resident (the elderly, or persons with existing medical conditions etc.), the exposure of this class of occupant to soils (soil particles, by contact, inhalation or ingestion etc.) would be expected to be limited (i.e. gardens are communal & managed gardens, with no vegetable production, or gardening activity likely), and exposure period to chronic contamination would be shorter than for conventional housing. Nevertheless, the screening criteria would be based upon a sensitive residential receptor (child) with longer term, elevated, and formative exposure. For the class of resident proposed at this site, contaminants capable of entering the building are likely to be of greatest concern (i.e. any volatile hydrocarbons, or soil gas). Given that there is no particular reason to expect contamination or potentially contaminating features from a known historic or recent landuse (identified either by HBC, or by the wider reporting, including a phase 1 report that includes this area), I am comfortable to accept the report in the absence of a specific desk study.

- 2) Samples collected from within 0.8m of the surface, largely from disturbed ground / made ground. This is the only identified potential source of contamination, and the most relevant zone for exposure to soil contamination. In the absence of an identified or suspected source, and particularly in respect of the context of clayey geology; contamination of natural soils would not be anticipated. I am fairly comfortable with the omission of samples from natural strata, given the results from the disturbed soil overburden. However, I note that no groundwater samples were taken, despite the completion of most trial holes as wells. Given the (possible) shallowness of groundwater (being within 1m of the surface), and considering the limited sample resolution, groundwater sampling would have been informative with respect to the likely presence (or otherwise) of contamination from un-investigated areas of the site. As noted above, contaminants capable of entering the building (detrimental to indoor air quality, and important for the inhalation pathway) are likely to be most significant for the expected resident profile - groundwater samples would have also been particularly useful for informing an assessment of risk from volatile soluble or light non-aqueous phase liquids.
- 3) The wider desk study identified natural generation of soil gas as one of the primary risk drivers for this largely greenfield site. I agree with WCC that (likely as a formality, but nevertheless) *the contamination assessment condition should be retained on any consent granted for this phase, in order to maintain the impetus upon the applicant to complete this monitoring* and submit details to the LPA.
- 4) I agree that the results of the sampling that are presented do not raise any 'red flags', and largely represent <LOD results. The report does to some degree acknowledge the lack of a specific desk study, or CSM; and in addition the relatively limited sample resolution. I would consider that latter to comprise the greatest concern with respect to the confidence that can be placed in the results & conclusions of the report – I agree that the report is favourable in it's conclusions (as far as they can be drawn), but I am mindful of the lack of groundwater sampling, gas monitoring data, and that the soils results represent an approximate sampling rate of just 1 sample per 2000m2 plan area. I would agree that a more robust justification for the conclusions of the report, alongside it's omissions, is appropriate. However, given the lack of anecdotal reason to suspect any specific contamination at this site, I would consider that there is insufficient basis upon which I could require additional intrusive works. Additional sampling / monitoring from extant wells, for possible contaminants (i.e. soil gas) is however considered reasonable, and this should be provided in due course.

For these reasons given above, particularly in respect of the sample resolution and lack of groundwater samples; I would have liked to have seen a formalised 'contamination discovery strategy' to which the developer (or their principle contractors etc.) can be expected to adhere, and can be held to account against. A formalised strategy would 'hedge' against the uncertainty inherent with a low sample resolution, whilst allowing any pre-commencement conditions to be quickly discharged. I would certainly *recommend that the 'unexpected contamination' (outline condition 14 of 05/40000/000) be transferred to this phase of development*, and would welcome a more robust treatment of section 6.11 within the report.

I have no objections to the proposals in principle, and I have no particular concerns with regards groundwater receptors. I hope that the above is useful for the purposes of the report – let me know if you need any clarification.

Best Regards,

Jon

Jonathan Driver
Environmental Control Officer

Environmental Health, Public Service Plaza, Civic Centre Road, Havant, Hants PO9 2AX

Email: jonathan.driver@havant.gov.uk

Tel (Direct Dial): 023 9244 6677

Tel (Team Admin): 023 9244 6670

From: Alison Harker
Sent: 13 November 2014 12:39
To: Jill Lee
Subject: RE: Waterlooville

Dear Jill,

I have had an opportunity to review the phase II Ground Investigation Report at Dukes Meadow, Waterlooville (Reference: 14512/GIR, dated October 2014) and have the following comments to make:

1. This report was written without reference to a phase 1 report and as such a conceptual site model was not produced or used to inform the intrusive contamination assessment.
2. All of the samples analysed were collected from a shallow depth. No samples of the natural ground were collected.
3. Gas monitoring was underway and the results have not yet been received.
4. It has been concluded that on the basis of the results no soil remediation is required. Whilst it is acknowledged that the sampling undertaken has not highlighted any contamination issues to date, the limitations of the report have not been acknowledged as part of this statement (i.e. the lack of phase 1, absence of conceptual model, and shallow sampling). If the recommendation for no remediation is to be supported, a justification for not completing the missing elements of the assessment process must be provided.

Given the comments made above, this Service is not in a position to support the discharge of condition 9 at this stage. Should you wish to discuss these comments in more detail please do not hesitate to contact me.

Regards

Alison

Alison Harker
Environmental Protection Officer
Environmental Health
Neighbourhoods and Environment
Winchester City Council
Colebrook Street
Winchester SO23 9LJ
Tel: 01962 848503
Fax: 01962 840586
Email: aharker@winchester.gov.uk