

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	DCS/EH/JPD/141219002	Your Ref:	[As Application Ref:]
Ext. No:	6677	Date:	19/12/2014

DC Case Officer: Daphney Haywood
Application Number: APP/14/01228
Site Address: 28-64 Station Road, Hayling Island, PO11 0EL

Proposed Development: Demolition of servicing workshop (Hayden Garage) and construction of 3No. Office units and 5 dwellings, alterations to access and new car parking.

Observations / Comments:

I have reviewed the submitted Dig-Geotech reports ("Report on Desk Study Area A Proposed Domestic Houses", and "Report on Desk Study Area B, Commercial Offices" [ref: 517/R01 & 517/R02 respectively]) alongside the proposals for this site.

Summary

The reports are broadly agreed to be a robust characterisation of the potential sources & relevant receptors at the site. I note however that the potential for Gas works related waste to be present within the area of residential development is downplayed, despite the clear association between the two parcels of land as indicated by the presence of a former 38' diameter gas holder tank being located within the centre of the 'area A' site.

The Area B desk study acknowledges that "*Unrecorded waste is common at such plants especially where redevelopment was some time ago*". It is considered that deposition of gas works waste on the more open site to the north (the residential area site) is more likely than disposal on the 'tighter' main gas works site adjacent, if wastes were indeed locally disposed of / buried. In addition, gas holder tars / liquor / precipitate are considered not unlikely to be present (associated with the holder on site), and that there exists a tangible potential for migration from the adjacent site as the groundwater is expected to be shallow, with variable directionality under tidal & seasonal influence. Experience of similar gas works sites would suggest that significant contamination, and significant migration are possible.

Given the association between the two sites, it is unclear as to why the assessment of 'medium to high' risk (identified for the commercial area) would not apply to the residential area, given the elevated sensitivity of the receptor & not dramatically reduced probability of associated contamination being present.

The report does recommend an intrusive investigation, and this is agreed to be necessary. The trial-hole locations proposed are agreed to be broadly appropriate in principle, and as an informative, I would prefer to see the use of both trail pits & window samples at this site. Window Samples would allow gas / vapour / groundwater sampling and assessment of the presence / thickness of free-phase Light Non-Aqueous Phase [Liquid] (LNAPL) hydrocarbons, would permit repeat monitoring if necessary, and allow deeper investigation if ground

conditions prove unstable due to high groundwater levels. Trial pits are useful for the inspection & sampling of representative near surface soils, allowing the visual inspection of a good portion of the stratigraphy & use of in-situ screening (for total volatiles, for example).

Some form of condition is clearly anticipated, and is indeed considered to be appropriate – as indicated in previous responses to GEN applications & at the pre-application advice stage.

The conditions proposed below are worded to accommodate a phased approach (as is clearly desired, with the 2-area reporting approach adopted for the desk study), and have been amended to reflect the desk study and investigation proposals submitted with the application.

Condition 1

Prior to the commencement of any specific phase of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), a scheme to deal with the risks associated with the possible contamination shall be submitted to and approved in writing by the Local Planning Authority. That scheme shall include all of the following elements unless specifically excluded, in writing, by the Local Planning Authority.

1. The results of the site investigation proposed within the Dig-Geotech Ltd. Desk Study reports referenced 517/R01 & 517R02, and (if appropriate), a suitable risk assessment, remedial options appraisal and remediation strategy based on these results, giving full details of the remediation measures required and how they are to be undertaken.

2. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (1) are complete, identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

All elements shall be adhered to unless agreed in writing by the Local Planning Authority.

Reason: *Having due regard to policies and proposals E1 of the Hampshire County Structure plan 1996-2011 (Review), and DM10 of the Havant Borough Adopted Core Strategy (2011); Contamination may be present at the site as a result of both previous & current landuses (&/or activities) at the site that could pose a risk to future site occupiers.*

Condition 2

“No occupation of any part of the permitted development shall take place until a verification report has been submitted to and approved in writing by the Local Planning Authority.

The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan, and must demonstrate that site remediation criteria have been met. It shall also include any plan identified as being necessary for longer-term monitoring of pollutant linkages (a “long-term monitoring and maintenance plan”), including provision for maintenance and contingency action. The long-term monitoring and maintenance plan shall be implemented as approved.”

Reason: *Having due regard to policies and proposals E1 of the Hampshire County Structure plan 1996-2011 (Review), and DM10 of the Havant Borough Adopted Core Strategy (2011); Contamination may be present at the site as a result of both previous*

& current landuses (&/or activities) at the site that could pose a risk to future site occupiers.

Condition 3

"If, during development, contamination not previously identified on site is found to be present, no further development (unless otherwise agreed in writing by the Local Planning Authority) shall be undertaken until a report has been submitted to and approved by the Local Planning Authority that details how that contamination is to be dealt with. Unless otherwise agreed in writing with the Local Planning Authority, all works outlined in the submitted report shall be adhered to."

Reason: *Having due regard to policies and proposals E1 of the Hampshire County Structure plan 1996-2011 (Review), and DM10 of the Havant Borough Adopted Core Strategy (2011); Contamination may be present at the site as a result of both previous & current landuses (&/or activities) at the site that could pose a risk to future site occupiers.*

Best Regards,



Jonathan Driver
Environmental Control Officer