

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

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	DCS/EH/JPD/130627001	Your Ref:	[As Application Ref:]
Ext. No:	6677	Date:	27/06/2013

DC Case Officer: Aaron Wright

Application Number: 0X/51184/00X

Site Address: Former Proctor & Gamble Site, Dunsbury Way

Proposed Development: Outline application for demolition of existing buildings and redevelopment for mixed use purposes consisting of 4.11 hectares of residential use (including 1.4 hectares of amenity space and 264 dwellings), 0.66 hectares of community/health use (including a new community hall and building for health purposes), 3.48 hectares of employment use (consisting of retention of the 9945 sqm warehouse (B8) and the provision of 4320sqm floorspace of new build employment (B1, B2) units), and associated parking and ancillary works. (04/51184/050)

Observations / Comments:

I have received an email from Lauren Boydell (Senior Consultant- Land and Water Management; SKM Environmental), including two letter reports previously not seen by Environmental Health. It is believed that this is the balance of the reporting on intrusive works at the site, and that HBC now has all relevant reports on file.

Whilst specific quantitative risk assessment has not been undertaken for either controlled waters, or human health; the letter report ref: BA1500001/EA Letter (dated 19/04/2007) does provide greater certainty with respect to the underlying stratigraphy, extents & depths of made ground at the site, and groundwater flow regime. It is noted that the Environment Agency has accepted the qualitative risk assessment based upon an experiential judgement accounting for the measured concentrations reported, geological & hydrogeological conditions, and absence of significant concentrations present in down-hydraulic gradient monitoring wells.

There is a response on file from the Environment Agency, setting out its position with respect to the former UST on the southern boundary of the site, circa 13m from the Riders Lane Stream, following the review of Enviros Letter report Ref: DW0180001B/PBJ/Risk dated 29/01/2007 (received by EH in April 2013). These comments highlight some deficiencies in the assessment relating to the setting of an appropriate quantitative, site specific & risk based level for 'acceptable concentrations' (of various contaminants of concern), and to the validation of source removal works. However, these comments also accept that a significant volume of impacted soils have been removed from this area, resulting in an overall site betterment, and whilst relying heavily on the credibility of the environmental consultants professional opinion (due to a relative lack of empirical evidence) the argument that the risk should be regarded as low-negligible was accepted. The Environment Agency confirmed in this letter response (dated 14/03/2007, ref: HA/2007/100658/01-L01) that "we will not be requiring further active remediation of this area at this time". It is acknowledged by the EA that there remains the possibility of undiscovered, or incompletely investigated contamination may still exist in the region of DS9 / EWS3/EWS109 at depth (~4.0m BGL), or in the region of DS10; cautioning that "if issues arise in the future that can be attributed to this site, further works may be required at a later date".

I have reviewed the additional reports DW0180001B/PBJ/Risk & BA1500001/EA Letter, and agree that there remain some issues that in an ideal world would be addressed with respect to quantitative

risk assessment, validation, and VOC; considering controlled waters as the relevant receptor. I do consider however that following the source removal works in the region of EWS106 & DS9, and following the groundwater monitoring undertaken & reported within BA1500001/EA Letter; that there is no substantial evidence to support a conclusion that significant gross contamination remains on the site that is likely to result in a tangible risk to the Riders Lane Stream. I would therefore agree that conditions relating to the assessment & mitigation of risks to controlled waters should now be signed off; though in line Environment Agency comments, and as a result of limited investigation in the region of DS10; this should not be taken to mean that no potential liabilities remain on site.

With respect to Human Health, the outstanding issues related predominantly to elevated results in the region of EWS5. The letter report ref: BA1500001/EA Letter provided one additional sample location within 30m of EWS5, identifying elevated hydrocarbons & marginally elevated PAH in groundwater at an up-hydraulic-gradient location relative to EWS5. As with other areas of the site the precise source remains unclear. The results remain inconclusive with regards to whether a significant soil source is likely to exist (undiscovered), and no speciated results are available in order to allow an assessment of likely risk based upon the proportion of aromatic to aliphatic compounds, or to the length of carbon chain (affecting volatility & toxicological function).

I have however reviewed the site layout as constructed, and note that:

- all areas of potential concern (namely DS1/EWS5/WS2; and EWS4/EWS106/WS3) are located within low-[exposure] risk areas of the site, and do not correspond to private garden areas.
- DS1/EWS5 are located within public amenity space,
- WS2 is located beneath a block of flats
- EWS4 & WS3 appear to be located within public amenity space,
- EWS106 is located beneath a block of flats; and
- Soil gas / vapour protection has been incorporated into the built structures (inclusive of the residential blocks of flats), mitigating the most plausible exposure pathway

In this way, the areas of the site where we may have less confidence with respect to the nature and extent of any residual contamination are relatively low risk, and where receptors are directly present, the primary exposure risks have been effectively mitigated.

Considering the above, identified concentrations of PAH and hydrocarbon screening results for groundwater are considered unlikely to be sufficient as to be a legitimate concern with respect to Human Health issues. It is not considered that the site could fall under the Part 2A Contaminated Land regime in future, as a result of residual contamination documented within the Entec / Enviro Reports, and it is therefore considered that the conditions applied to the various planning consents relating to the Former Proctor & Gamble site have therefore been complied with. No additional assessment or remedial works are considered necessary.

As a result of this assessment, I can now recommend that:

- c.9 & c.16 of 04/51184/050 be formally discharged upon application*
- c.14, c.16 of 05/51184/051 be formally discharged upon application*
- c.23 & c.25 of 05/51184/052 be formally discharged upon application*
- c.18 of 07/51184/054 be formally discharged upon application*

* - if these conditions remain outstanding

Best Regards,



Jonathan Driver
Environmental Control Officer