

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/21/01000	Your Ref:	APP/20/00551
EH Case Officer Extn:	44 6677	Date:	28 April 2021
DC Case Officer:			
DC Case Officer Extn:			
Application Number:	APP/20/00551		
Site Address:	1 Westland Drive, Waterlooville, PO7 5UG		
Proposed Development:	Construction of 1No. detached 3 bedroom dwelling with associated parking and access, landscaping and refuse cycle store.		

Observations / Comments:

The development land is brownfield, previously forming part of the Purbrook Industrial School complex. The school was constructed sometime between 1867 & 1898, with additional buildings constructed by 1932. The label 'industrial school' also suggests that some practical activities may have been undertaken – e.g. metalwork, coating activities, mechanical engineering etc., which could have contaminants associated.

I have reviewed the planning history for the site, and I note the following;

- **HWU_1960 (Jul 1952): Use of land and buildings for light industrial purposes at industrial school, Stakes Hill Road.** Refers to a need to 'improve access for loading & unloading' (implying that industrial purposes are at reasonable scale)
- **HWU_2098 (Oct 1952) : Use of former school for light industrial purposes.**
- **HWU_4164 (Dec 1955): (Siting of Caravan).** Applicant refers to interest in adjacent land, which is referred to as 'Purbrook Depot'
- **16547/G (Aug 1964): Residential Development of former approved school site, Stakes Rd. Purbrook.**

School sites are not uncommonly affected by the presence of asbestos and lead within made soils, as well as contamination from kerosene / gasoil associated with liquid fuel fired space-heating systems. Depot sites are often affected by fuel-range hydrocarbons, PAH, asbestos, and other metals. Light industrial processes may involve the storage, handling and use of a range of potentially contaminating substances.

Unfortunately, the planning archive includes little information to assist in identifying which areas of the former school may have been used for the storage, handling, or use of potentially contaminating materials (or the undertaking of potentially contaminating processes).

The main building façade is coincident with the northern boundary of the application land. This façade includes a small projection in earlier map issues which is coincident with the application land, possibly indicative of a store or boiler house. A collection of buildings was formerly present to the west of the main building, with some of these being coincident.

Where relevant averaging areas are small (as in this case), the probability that contaminants present within soils could make the site determinable as contaminated land increases (as there is an increased probability of interaction with the affected soils).

Given the presence of the sub-station, it is not clear that the application land currently benefits from an existing 'residential' landuse. Irrespective, planning policy will apply to a new development irrespective of whether a change of use is involved, and I would highlight the provisions of NPPF paragraphs 170 & 178-179, local plan policy DM10, and allocations plan policy DM17.

Considering this above, it would be appropriate to seek a proportionate shallow site investigation to confirm acceptable ground conditions (contamination risk), and to secure targeted remediation or risk mitigation to achieve an adequate degree of protection to future occupants. As it is a small site, it is considered appropriate to dispense with the need for an environmental desk study.

Suggested condition wording below;

Contamination (Standard – omitting EDS) [1]

Prior to the commencement of development hereby approved (other than any site clearance, or demolition of above-ground structures), an assessment of the nature and extent of contamination at the site, whether originating from within or outside the curtilage, shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall be undertaken by competent persons, and the findings presented as a written report.

The assessment may comprise separate reports as appropriate, but unless specifically excluded in writing by the Local Planning Authority, shall include;

- 1) Site investigation appropriate to both the previous & approved use of the site, to provide sufficient data and information to adequately identify & characterise any physical contamination on or affecting the site, and to inform an appropriate assessment of the risks to future occupants.*
- 2) The results of an appropriate risk assessment based upon (1), and where unacceptable risks are identified, a Remediation Strategy that includes;*
 - appropriately considered remedial objectives,*
 - an appraisal of remedial &/or risk mitigation options, having due regard to sustainability, and;*
 - clearly defined proposals for mitigation of the identified risks.*
- 3) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out any Remediation Strategy required under (2) are complete, identifying any requirements for longer-term monitoring of pollutant linkages, maintenance of engineered mitigation measures, and arrangements for contingency action.*

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

Reason: *Contamination may be present at the site as a result of both previous land uses (&/or activities) that could pose a risk to future occupants of the residential development. This is in line with DM10 of the Havant Borough Local Plan (Core Strategy) 2011, DM17 of the Havant Borough Local Plan (Allocations) [2014], and paragraphs 178-180 of the National Planning Policy Framework."*

Verification (Standard) [2]

*Prior to the occupation of any relevant part of the permitted development, any verification report required in accordance with **condition [1]** shall be 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. Where

longer-term monitoring of pollutant linkages is identified as being necessary, the report shall clearly set out plans for monitoring, provision for maintenance, relevant triggers and contingency actions (a "long-term monitoring and maintenance plan").

The long-term monitoring and maintenance plan shall be implemented as approved.

Reason: *Contamination may be present at the site as a result of both previous land uses (&/or activities) that could pose a risk to future occupants of the residential development. This is in line with DM10 of the Havant Borough Local Plan (Core Strategy) 2011, DM17 of the Havant Borough Local Plan (Allocations) [2014], and paragraphs 178-180 of the National Planning Policy Framework."*

Informative [1] – Guide to scope of required Site Investigation

"It is the responsibility of the developer to ensure development, upon completion, is safe & suitable for its consented future use. The developer should be aware that liability for contamination does not necessarily transfer to subsequent owners of land. Conditions numbered [1] & [2] have been imposed in response to contamination risks which exist at the site in connection with the structures present prior to its residential tenure, and which may be associated with the adjacent Electricity Substation. Given the known history of the site, Havant Borough Council does not consider that an environmental desk study is necessary to guide an appropriate / proportionate intrusive investigation. The Council does not expect the investigation required by condition [1] to consider risks to persons or environmental receptors external to the red-line boundary to which this consent relates, unless initial results indicate the presence of a significant- & previously unknown- source of contamination which is likely to be mobile. The Council expects the sampling suite to include CLEA metals, PAH16, TPH & Asbestos screen at a minimum, with at least one sample from an appropriate location to be tested for PCB's. An investigation depth limited to 1m below existing ground levels-, or to the base of contamination-impacted made soils if deeper-, is expected to be adequate to characterise the risks posed to future occupants. It is recommended that soil samples are not collected from depths shallower than 150mm below existing ground levels, in order to avoid highly localised deposits at the ground surface"

Mr. Jonathan Driver
Environmental Control Officer