

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/18/01605	Your Ref:	APP/18/00701
EH Case Officer Extn:	44 6677	Date:	21 August 2018
DC Case Officer:	Tina Pickup		
DC Case Officer Extn:	44 6461		
Application Number:	APP/18/00701		
Site Address:	St Peters Primary School, Stakes Hill Road, Waterloooville, PO7 7BP		
Proposed Development:	Installation of single storey modular building with brick slip cladding to blend with existing school building and aluminium windows.		

Observations / Comments:

I have reviewed the location and proposals, and would like to make a brief comment as regards contamination risk. Further comment may be made by Environmental Health under separate cover as regards noise / nuisance issues.

History:

The wider 'Oaklands' site was in use prior to the earliest available mapping (1868), with land comprising the St Peters Primary School being occupied by productive orchards, and an arrangement of gardens, glasshouses & outbuildings associated with the Oaklands Property, and the subordinate cottages within its grounds. This arrangement is consistent with productive kitchen gardens, commonly found at / around prominent residences of the period. In terms of potential contaminants, there are a number of sources commonly associated with properties of this type - typically including a general midden &/or segregated bottle-dump, but also areas used for waste disposal by burning, extensive use of potash as a soil improver, use of persistent metallic- and arsenic containing- pest control preparations, fuel and combustion residues from glasshouse and space heating, in-filled local features (drainage ponds and saw-pits), and persistent contaminants from decorative and preservative finishes (lead paints, and creosotes in particular). Less commonly, local production of town gas is occasionally associated with such properties.

I note that the area of land where the proposed classroom is to be sited is presently a play area. Plans deposited with 96/50355/000 identify the structures in the vicinity and formerly present in this area of the site to be 'garage / stores', 'boilers', and 'workshop'. All of these features are potential sources of contaminants, depending upon the actual activities undertaken / material stored - or the fuel used. I have not identified whether asbestos was likely to have been extensively used in the demolished structures (garages / stores), but it is acknowledged that the cottages are unlikely to have contained asbestos at their original construction.

Contamination Risk:

In line with the above - there are multiple potential sources of contamination - none likely to represent a bulk source / gross contamination, and if present, contaminants are likely to be relatively localised.

I am mindful of the present use, being a soft-landscaped play area. In this context, the proposed development represents a landuse of lower contaminant sensitivity to the existing. The development would involve little groundwork, and the development area comprises only a small proportion of the 'relevant averaging area'. In planning policy terms (and in terms of physical exposure) contamination risk is sensitive to averaging area, and a larger area by definition is less likely to be considered 'contaminated' than a smaller area (given the same source).

I do expect that a degree of contamination is likely to be present (in terms of contaminants measurable at concentrations exceeding those considered to represent general 'background' contamination). It is however far from certain that maximum concentrations would exceed health screening criteria, and less certain still that a representative average concentration (which would probably apply to an area exceeding the planning red-line for this application) could be deemed to be unacceptable. Given the above risk scenario - in policy terms (NPPF / DM10 / DM17), I believe that it would be stretching reasonableness to require a pro-active site investigation to confirmation that soils are suitable for their proposed use; the form of development itself reduces the magnitude of an existing theoretical risk. Contaminants likely to be present from the sources identified are unlikely to be readily identifiable by visual or olfactory means (in terms of being distinguishable as higher risk than inert construction & demolition wastes likely to be present in general made ground as a result of the demolition of structures), and as such the observance of a formal watching brief is likely to be of limited value.

Conclusions;

On the above rationale - it is reasonable to conclude that the current proposals represent a net positive change to the conceptual risk model for the site. I therefore have no adverse comments to make, and I make no recommendations for planning conditions.

Mr. Jonathan Driver
Environmental Control Officer