

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	DCS/EH/JPD/131004001	Your Ref:	[As Application No.]
Ext. No:	446677	Date:	04/10/2013

DC Case Officer:	Ms. Rachael McMurray
Application Number:	APP/13/00947
Site Address:	84-86 Jubilee Road, Waterloo, PO7 7RE
Proposed Development:	Change of use from office (B1) to school (D1) and alterations to access to 88a.

Observations / Comments:

Comments have been provided previously at the pre-application stage, under Development Control Reference GEN/13/00650.

The proposals remain substantially unchanged, and I cannot see any amendments that would materially alter the position outlined at the pre-application stage with regards contamination.

I have no adverse comments to make in respect of these proposals, and propose no conditions. The text of my previous response is reproduced below (in italics) for completeness of records.

[Response to GEN/13/00650]

"School use is considered to be a sensitive landuse – particularly where young, disabled, or mentally impaired individuals are likely to use the premises; due to the increased risk of behavioural exposure to soils (direct contact through play, ingestion & inhalation of dust). The current landuse in Jubilee Road is a mix of industrial / commercial & residential uses, and so it warrants a look at the site history; which is as outlined below (from historic mapping);

- The area formed part of Park Farm from before 1867 until at least 1909, comprising partially wooded, but predominantly open farmland (likely grazing land)*
- By 1932 Park Road (later to be renamed as Jubilee Road) was constructed along with several residential properties to the north and south, and a small industrial unit at land formerly known as 76 Jubilee Road. The partially wooded / open land to the rear of 84-86 Jubilee Rd. is now marked as a recreation ground, in line with current landuse.*
- By 1953, Jubilee Weaving Mill was established to the south of Jubilee Road, along with additional residential property (including the subject site), and various small buildings on segregated plots to the east & west of the subject site, and within the current car-park / proposed play area. these are difficult to interpret from the map, but are assumed to be commercial in nature. It is possible that the hall was constructed around this time.*
- By 1963 the weaving works had been demolished & replaced with several smaller industrial units marked only as 'works' (marked on later mapping as predominantly 'engineering'). The western half of the subject plot remains in residential use, but the eastern half is shown to be occupied by 4 closely spaced & relatively small buildings set well back in the plot (i.e. within the secure play area).*

These are assumed to be storage sheds, likely associated in some way with commercial uses in the area.

- By 1974, the layout of the area is broadly in line with that present today.

From the above, there might be reason to suspect that the presence of some contamination on the site (in the proposed secure play area in particular), is not unlikely. The presence of storage sheds / buildings (used for unknown materials & in connection with unknown business activities) within the proposed play area could potentially have led to direct release of liquid oils / fuels / solvents / chemicals, or powdered products / metals etc. Additionally, the likelihood of made ground is increased due to the several phases of development over a relatively short period - notably when asbestos was in common use.

The weaving works is also a potential concern - textile / weaving / laundry works are commonly associated with chlorinated solvents that are both persistent & mobile. There is a well marked within the recreation area, to the rear of 84-86 Jubilee Rd., indicating reasonable rates of groundwater mobility & recharge rate, and therefore a risk of migration of contaminants with groundwater.

The Geology of the site is predominantly London Clay overlain by (permeable) Head deposits & Sands. The distance between the proposed play area / school building & the weaving works (and other industrial uses) is as little as 50m. Groundwater flow direction is typically to the south, but locally variable, so migration of contamination from the weaving / engineering works while not necessarily likely; is possible, particularly if there are service trenches that might serve as preferential migration pathways.

So, the proposed landuse classification is clearly sensitive, and there are tangible, if not well defined contamination risks both on-site and within the immediate vicinity. Considering the specific proposals however;

- The age-range of pupils of the proposed facility is 11-18; still within the developmental stage, but not in the highest risk category (~ 6 yrs)
- Exposure durations would be limited - if completing a standard educational programme (as proposed), an 11 yr old would be present at the premises for a maximum of 30hrs/wk over a maximum of 7 years - notably less than would be accounted for in a CLEA assessment for a residential exposure scenario.
- Whilst requiring 'specialist education', there is no indication that the pupils are likely to be predominantly mentally impaired (i.e. at increased risk of behavioural exposure to soil), and I would interpret the design & access statement to indicate that the facility is not intended to specifically cater for this category of special educational need.
- From the design & access statement, it would appear that it is intended to retain the existing hard-standing within the secure play area, with the only change being the erection of fencing
- Organised outdoor activities are proposed to be undertaken at the recreation ground - with gates proposed to facilitate access to this facility.
- There is little, if any soft landscaping / exposed soil at the site, limiting the potential exposure pathways (ingestion / inhalation of dust / direct contact) between contaminants that might be present within the soil, and the pupils / staff.
- Indoor inhalation pathways could potentially be an issue if volatile hydrocarbons / solvents are present (not necessarily likely, but equally not unlikely), however it is notable that this is the only tangible exposure pathway; and is a pathway particularly relevant to a limited range of possible contaminants.

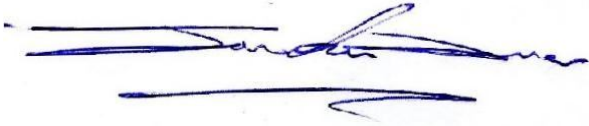
If the current building on the site were to be demolished & replaced with a purpose built specialist educational facility; I would certainly seek suitable conditions to require the investigation of ground quality, and suitable remediation if appropriate.

However, it is not considered to be proportionate in the context of the proposals, and in absence of any empirical or anecdotal evidence of actual contamination, to require a physical investigation of soils. This position accounts for the fact that these soils underlie existing impermeable hardstanding that would act as an

effective barrier to any meaningful outdoor exposure, with reference to direct contact, ingestion & dust inhalation routes and the location of potential on-site sources coincident with the secure play area.

You may wish to inform that applicant however that any comprehensive redevelopment of the site is likely to require intrusive investigation of soils to confirm the absence of unacceptable risk, or to undertake works to reduce any identified risks to acceptable levels."

Best Regards,

A handwritten signature in blue ink, appearing to read 'Jonathan Driver', with a horizontal line drawn underneath it.

Jonathan Driver
Environmental Control Officer