

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	DCS/EH/JPD/140228001	Your Ref:	[As Application Ref:]
Ext. No:	6677	Date:	28/02/2014

DC Case Officer: David Eaves
Application Number: APP/14/00008
Site Address: Former Bedhampton Arts Centre, 29 Bedhampton Road, Havant
Proposed Development: Construction of 3No. 2 bed terraced houses, incorporating access and parking from Kingscroft Lane.

Observations / Comments:

Site History, Notes

I have previously reviewed this site in connection with the conversion of the school building to 4 no. dwellings. I have reviewed the current Design & Access Statement (D&AS), and again looked over the Historic Landuse mapping in connection with the current proposals for the previously retained, hereinafter referred to as the 'subject plot'. I note the following with respect to the area in general, (text largely based upon the response to APP/12/01105)

- The School was developed on 'greenfield' land, sometime between 1867 & 1897 – I note from the new D & DA (7.0 – heritage), that it was constructed in 1868, and extended twice before 1898.
- The School pre-dates any adjacent landuse (i.e. adjacent land was Greenfield up to at least 1909)
- A Warehouse was developed on land adjacent to the school sometime between 1909 & 1932
- The Warehouse was marked as a "Sheet metal Works" in 1954, (warehouse in 1961), and as a "Depot" in 1973.
- The Garage (Petrol Filling Station) was developed at 23 Bedhampton Road sometime between 1954 & 1959
- A Large commercial/industrial unit (precise usage unknown, but assumed likely to have been garage services / automotive related) was constructed between 1963 & 1973. Building remains in place today, presently trading as Cambridge Garage (Sales).

With respect to the subject plot (landuse) specifically;

- A linear bund is shown on 1954 mapping, oriented in line with & located adjacent to the Eastern boundary of the school site, but terminating south of the garden areas of plots 1 & 2. bund dimensions are approximately 50m x 8m. A large area of hard-standing is also shown to the east of the main school building on this mapping, encompassing approximately half of the garden area of plot 3.
- 1959, 1961 & 1963 mapping shows the linear bund feature to comprise 4 mounds of approximately equal dimensions & spacing, with the northernmost mound splaying – possibly to meet a higher ground level in the northern portion of the site.

- 1963 mapping shows an additional store / building to the East of the 1954 Hardstanding area, positioned centrally within the garden area of plot 2.
- 1973 mapping shows two additional small buildings (each approx. 3.0m x 2.6m) at the Eastern boundary of the application site, to the east of the 1963 outbuilding, within the garden area and parking area for plot 1.
- 1975 mapping (10K Scale) does not show the smaller outbuildings to the east, but this may be as much a function of the map scale as it is an indication that the structures had been demolished by this date.

Implications for Land Contamination Issues

The above summary, and that provided previously (APP/12//01105) shows that there has been extensive alterations to the buildings & accommodation on the application site throughout its history, and in particular over the past 75 years.

The linear bund feature is thought likely to relate to WW2 bomb-shelter structures, earth covered, and taking advantage of the sloping topography of the site. These may therefore represent both excavations & raised earthworks dating from the early 1940's. Their 'removal' date is concurrent with the construction of several buildings, and it is likely that any excavated / below ground elements would have been filled with building waste, which during this time-period is likely to have included asbestos materials.

Similarly, with the extent of construction & demolition of outbuildings and hardstandings on the site (that would have likely used construction & demolition wastes variously as hardcore, in line with common practice of the period), there is a reasonable risk of asbestos materials being present within the made-ground that is almost certainly present across the majority of the site. The use of small outbuildings is not known, and it would not be uncommon for small outbuildings such as these to have been used to house boilers / fuel.

There is also a risk of migration of contamination from adjacent landuses (i.e. petrol filling station / service & repair garage / sheet metal works / depot) on to the site. The risk of contamination migrating on to the site (red-line application area) is not considered to be particularly high, as groundwater flow would be expected to tend toward the south (nearest surface water courses, and in line with typical flow in the area).

However, my response to the school conversion application did acknowledged that the subject plot at the eastern boundary was the area at greatest risk from contamination sources outside the school boundary. This area also encompasses the majority of the suspected bomb-shelters, albeit that with the current scheme these fall entirely within parking and manoeuvring areas.

Conclusions

These proposals are inherently different to those proposed for the school conversion, in that they comprise entirely new development, on an entirely clear site. Given the likely prevalence of made ground already noted, and the sensitivity of the proposed landuse (residential with private garden areas); it is considered that some degree of site investigation should be undertaken. I am however mindful of the following:

- The school building (to be retained, and converted to residential landuse) was constructed on Greenfield land, where no potentially contaminating landuses had previously been undertaken.
- Land comprising the suspected bomb-shelter features is to be used for the vehicle manoeuvring & parking areas
- Local groundwater flows can reasonably be expected to be broadly to the south, limiting the risk of extensive migration of (for example, hydrocarbon or VOC) contamination from adjacent landuses to the East, onto the development site - particularly from the original petrol filling station located some 45m to the east.
- The relatively small scale of the development.

It is considered that the risk –driver for the site is the presence of made-ground, the potential for asbestos to be present within proposed private garden areas, and the potential for migration of contamination from the adjacent historic landuses, namely the former sheet metal works and service & repair garage.

It is considered that some environmental / contamination sampling should be undertaken to confirm the risk status of the land, of a suite suitable to identify general contamination, asbestos, and that which may be associated with engineering & automotive landuses. Some form of excavations should also be undertaken to confirm current ground conditions, and characterise the nature & depth of made ground (if present).

If Development Control are minded to grant consent for this scheme I would request that the following conditions be attached:

Condition 1

Prior to the commencement of the 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 contamination of the site 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. A desk study identifying:

- All previous uses*
- potential contaminants associated with those uses.*
- a conceptual model of the site indicating sources, pathways and receptors*
- potentially unacceptable risks arising from contamination at the site.*

2. A site investigation scheme based on (1), for the purpose of informing an appropriate assessment of the risks to all receptors that may be affected, including those off site.

3. The results of the site investigation and risk assessment (2) and if appropriate, a method statement based on these results giving full details of the remediation measures required and how they are to be undertaken.

4. A verification report shall be prepared on completion of the works set out in (3) [if any] confirming the remediation measures that have been undertaken in accordance with the method statement and setting out measures for maintenance, further monitoring and reporting, if appropriate.

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

Reason: *To prevent future occupiers of residential units on the site from being exposed to unacceptable risks (including those from asbestos) arising from previous building & demolition activities undertaken at the site, and from adjacent landuses, 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)*

Condition 2

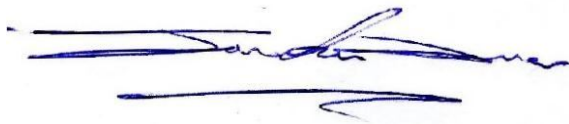
"If, during development, contamination not previously identified on site is found to be present, no further development shall be undertaken until a report has been submitted to and approved by the Local Planning Authority detailing how that contamination is to be dealt with. Unless otherwise agreed in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

Reason: *To prevent future occupiers of residential units on the site from being exposed to unacceptable risks (including those from asbestos) arising from previous building & demolition activities undertaken at the site, and from adjacent landuses, 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)*

Please note, the wording of the primary condition (condition 1) differs from that applied to the school conversion (APP/12/01105), owing to the nature of the development being 'new-build'.

I would recommend that the applicant engage with Environmental Health at an early stage regarding the scope of required investigations, in order to avoid unnecessary delay in achieving compliance with the primary condition (condition 1).

Best Regards,



Jonathan Driver
Environmental Control Officer