

Name of Applicant	Proposal	Expiry Date	Plan Ref.
Mr Shane Carroll	Demolition of existing buildings and associated site remediation, removal of existing redundant services and utilities.		24/00335/FUL
	Former Library, Council Offices, Fire Station and Residential Buildings, Windsor Street, Bromsgrove, Worcestershire, B60 2BJ		

RECOMMENDATION: That subject to the final satisfactory comments from WRS Contamination, full planning permission be **GRANTED**

Consultations

WRS - Contaminated Land

Interim Response

Worcestershire Regulatory Services (WRS) have reviewed the proposal in relation to contaminated land. I'm mindful that we have not yet provided a formal response to this application as we have been awaiting further information however in the meantime, I thought it would be useful to provide an interim response in respect of contaminated land considerations.

A number of contaminated land assessments and investigations have been undertaken across the site in recent years. The assessments have identified widespread presence of PFAS/PFOS chemicals (per and polyfluorinated alkyl substances) across the site within the soils, groundwater and in the basement structures. The reports indicate the substances are associated with the history of the site as a fire station and the use and storage of firefighting foams.

Currently only the Brownfield Solutions Ltd "DQRA and Remediation Strategy" (ref WG/M4400/11231, REV A, dated September 2022) has been provided in support of the planning application. WRS are aware that a later version of this document is available dated October 2023. There is also a report entitled "Remediation Specification, Verification and Post-Remediation Monitoring Plan" (ref WG/M4400/11682, dated January 2024) produced by Brownfield Solutions that details the proposed remediation methodology and process to be undertaken. It is not clear why these documents have not been provided in support of the planning application. WRS recommend that the latest available documents are made available in respect of the planning application.

Given the nature of the site, the sensitivity of the sites hydrogeology with the presence of the principal aquifer, and the nature of the contamination (PFAS chemicals), the key driver for remediation is the risk to controlled waters. The Environment Agency (EA) are the statutory authority in relation to controlled waters and are therefore the lead authority on such matters. It is understood that the assessment process, including the DQRA and development of site remedial targets, has been through liaison and agreement with the EA. It is considered that works to remove PFAS impacted material on site and provision of a suitably protective cover system will mitigate risks to human health. However, there

may be further remediation required once demolition has taken place and further investigation in previous inaccessible areas is undertaken. This is referred to in more detail below.

WRS would raise no objection to the demolition of the above ground structures which would be necessary to allow for the remediation of the site. However, any demolition works must be undertaken with full consideration to the presence of the PFAS/PFOS substances that have been demonstrated to be present within the brick basement structures and foundations, as well as soils and groundwater. The process should be managed so as not to cause migration of those substances around the site or to cross contaminate demolition materials that may be suitable for reuse with those that are unsuitable. The latest remediation specification states that demolition is to be undertaken to ground floor only and not include below ground structures or foundations, services, or drainage.

As well as the presence of PFAS substances there is known to be asbestos material within the building fabric. As such this will need to be subject to the necessary asbestos surveys and removal and disposal by a suitable contractor. The demolition process needs to take account of the possible asbestos within the building fabric and care taken so that asbestos material does not become distributed across the site within soils or demolition material for reuse.

Any demolition strategies and works should be undertaken in line with the latest agreed remediation specification. It may be useful for any program of demolition works or form of demolition method statement to include reference to contamination issues and contingency for dealing with any unexpected contamination issues should anything unforeseen be encountered during the works, as well as management plans for dealing with demolition material.

In addition to the PFOS/PFAS contamination across the site there are other contaminants of concern (such as asbestos, hydrocarbons, elevated gas) that will require further assessment following the demolition process. This has been raised in previous correspondence made by WRS to the NWEDR. Although this application is only for demolition and remediation it is understood that proposals in the future are likely to be for residential housing (this is also referred to in the various contamination assessments) and therefore the site will be needed to be remediated to a residential end use. Large areas of the site where buildings were present have not been investigated. The remediation specification states that further verification samples will be taken for PFAS/PFOS to confirm if present and concentrations, this should be extended to cover all contaminants of concern within these previously inaccessible areas.

WRS would advise that a condition is included to ensure the remedial and verification works are carried out as outlined in the remediation specification.

North Worcestershire Water Management

I note this application is for demolition only, therefore there should be no drainage or flood risk implications.

We are not aware of any drainage assets within the site and considering the surface water flood risk and topography of the site, I do not believe there is any risk of polluting nearby watercourses during the demolition process.

Worcestershire Archive and Archaeological Service

No objection subject to conditions.

1. Written scheme of investigation 2. Completion of written scheme of investigation

WRS - Noise

No Objection

The submitted Condition & Demolition Statement appears satisfactory in terms of the proposed methods to monitor and mitigation potential nuisance from noise, vibration and dust emissions during the demolition phase.

Public Comments

13 letters were sent to neighbours 05.04.2024 (expired 29.05.2024)

Site notice displayed 04.04.2024 (expired 28.05.2024)

Press advert published 12.05.2023 (expired 29.05.2024)

One neutral comment has been received which requested consideration for local residents regarding noise, dust and dangers from unforeseen demolition process and that the residents in proximity be kept informed and advised on the process to raise any concerns of risk to human health or property prior and during this proposed work.

Relevant Policies

Bromsgrove District Plan

BDP1 Sustainable Development Principles

BDP17 Town Centre Regeneration

BDP19 High Quality Design

Others

NPPF National Planning Policy Framework (2023)

NPPG National Planning Practice Guidance

Relevant Planning History

18/01209/FUL	Proposed residential accommodation with care (Class C2) comprising 67 apartments with communal facilities, landscaping and parking	Withdrawn	04.08.2021
16/0191	Demolition of existing buildings and erection of Retirement Living Housing for the elderly (category II type accommodation), including communal facilities, landscaping and car parking and affordable housing. Resubmission of application ref 15/0836	Refused (Appeal Dismissed 14.12.16)	10.05.2016
15/0836	Demolition of existing buildings and erection of 49 Retirement Living Apartments (category II type	Refused (Appeal Dismissed	10.12.2015

accommodation) including communal 14.12.16)
facilities, landscaping and car parking
and 37 affordable apartments

Assessment of Proposal

The Site and its Surroundings

The application site is located within Bromsgrove Town within the defined Town Centre Zone. The site consists of the former Bromsgrove library building, the former fire station building and associated offices. The site has two separate accesses; one off Stratford Road serving the former library and the other off Stratford Road serving the former fire station building. A car repair business is located to the north of the site, with residential properties located to the east on Stratford Road. The High Street is located to the west with the current fire station building facing the rear of a number of High Street units. The Bromsgrove United Reformed Church (URC) is positioned on the southern boundary and Weldron House and Day Centre are located to the south east.

The Proposal

The application seeks full planning permission to demolish all the structures on Windsor Street which comprise a former library, Council office block, former Bromsgrove fire station, accommodation and a training tower for the firefighters.

Bromsgrove District Council have been awarded £14.5m through the Government's Levelling Up Fund to be invested into projects to improve Bromsgrove Town Centre. Four sites in Bromsgrove have been identified as part of the 2040 vision, one of which is the site discussed in this report, Windsor Street. The 2040 Vision will be delivered in several stages. The first stage (January 2022 – March 2025) includes the re-development of the former Market Hall site for flexible workspace, community and food and beverage uses (this was approved at the 18th February 2024 Planning Committee) and site clearance and remediation works on Windsor Street site to unlock the site for residential use and associated public realm improvements. These two projects are part of the Levelling Up Fund programme.

As identified on the Proposals Map the site is located within the Town Centre Zone. The site is allocated by Bromsgrove District Plan Policy BDP17.13 (TC6) as a major mixed use development opportunity which has the ability to enhance and expand the town's retail offer.

Residential Amenity

Policy BDP1: Sustainable Development Principles requires that in considering new development, regard will be had to: *'e) Compatibility with adjoining uses and the impact on residential amenity'*.

The development is bound by built form on all sides. However, the only residential development is located to the north-east on Stratford Road. The application site shares a boundary with No's 4, 6 and 8 Stratford Road.

Members will note the views arising from the publicity process. There is will clearly be disruption during the demolition process, however this will be temporary and it considered acceptable subject to compliance with a Condition and Demolition Statement that can be conditioned as part of any approval.

Contamination

A comprehensive suite of reports and assessments have been prepared regarding this site and the presence of PFAS/PFOS chemicals (per and polyfluorinated alkyl substances) across the site within the soils, groundwater and basement structures. The reports indicate the substances are associated with the history of the site as a fire station and the use and storage of firefighting foams.

It is also noted that there are other contaminants of concern (such as asbestos, hydrocarbons, and elevated gas) on the site.

WRS Contamination has been directly involved in discussions regarding the demolition of these buildings and has provided interim comments. They are currently assessing further reports, and their final comments will be provided in advance to the Planning Committee.

Subject to acceptable comments from WRS and compliance with the agreed assessment and strategies, I am satisfied the buildings can be suitably demolished.

Ecology

The development would have no adverse impact on any statutory or non-statutory designated sites, habitats present on-site were overall considered to be of very limited conservation value, comprising mainly hardstanding and building habitat with areas of species-poor amenity grassland. The loss of such habitats from the site is not considered to constitute a significant biodiversity loss and can be mitigated under any future planning application to develop the site. An informative regarding protected species would be attached to any decision notice to ensure that the applicant takes appropriate measures in the case of protected species.

Conclusion

This application to demolish the former Library, Council Offices and Fire Station Buildings on Windsor Street are required to facilitate wider regeneration plans for the site which are part of the Levelling Up Fund programme.

Final comments from WRS Contamination will be provided prior to the Planning Committee. Subject to those being acceptable, this demolition application is deemed to be acceptable.

RECOMMENDATION: That subject to the final satisfactory comments from WRS Contamination, full planning permission be **GRANTED**

Conditions:

- 1) The development to which this permission relates must be begun not later than the expiration of three years beginning with the date of the grant of this permission.

Reason: In accordance with the requirements of Section 91(1) of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 2) The development hereby approved shall be carried out in accordance with the following plans, drawings and documents:

Location Plan

Reason: To provide certainty to the extent of the development hereby approved in the interests of proper planning.

- 3) The demolition works hereby permitted shall be carried out in accordance with the details outlined in the Condition and Demolition Statement unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of the amenities of surrounding occupiers during the construction of the development.

- 4) No development shall take place until a programme of archaeological work including a Written Scheme of Investigation, has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of significance and research questions; and:

- a) The programme and methodology of site investigation and recording.
- b) The programme for post investigation assessment.
- c) Provision to be made for analysis of the site investigation and recording.
- d) Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e) Provision to be made for archive deposition of the analysis and records of the site investigation
- f) Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.

Reason: In accordance with the requirements of paragraph 211 of the National Planning Policy Framework.

- 5) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition (4) and the provision made for analysis, publication and dissemination of results and archive deposition has been secured.

Reason: In accordance with the requirements of paragraph 211 of the National Planning Policy Framework.

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