

**MOBILE HOME SITE ST NEOTS, CONTAMINATED LAND SURVEY  
(Report by the Head of Housing Services)**

**1. PURPOSE**

- 1.1 The purpose of this report is to consider the results and consequences of a recent contaminated land survey of the Council's mobile home park at Eynesbury.

**2. BACKGROUND**

- 2.1 The mobile home park in Howitts Lane, St Neots has been in operation prior to the 1974 reorganisation of local government. Previously it was owned by St Neots Urban District Council. At LSVT (2000) management of the site was passed to Huntingdonshire Housing Partnership (HHP). There are 50 pitches on the site and residents own their own mobile/park home paying a ground rent to the Council.
- 2.2 The occupiers of the mobile homes enjoy security of tenure under the Mobile Homes Act 1983. These rights can be assigned to another person and be passed on by succession to members of the family living with them or by anyone taking inheritance of the estate.
- 2.3 The site comprises of about 1.25 hectares as shown on the attached plan with access off Howitts Lane. It adjoins other District Council land at Levellers Lane which is occupied by industrial units. The mobile home park has been partly developed on the site of an old clay pit and brick and tile works.
- 2.4 The clay pits were filled and the ground levelled before a mobile home site was developed, around 1952. The presence of the clay pits was discovered from old (c.1920) maps of the site. The Environmental Health Services Division had collected the mapped information as part of their risk assessment of potentially contaminated land in Huntingdonshire. Members will be aware that when the contaminated land regime was introduced that this authority published a strategy for inspecting potentially contaminated land (June 2001).
- 2.5 This land was one of a number of sites scheduled for inspection over the next 10 years as part of the Inspection Strategy. This year various events coincided to make 2005 an appropriate time to undertake the investigation. Recent expenditure connected with electricity failures together with enquiries from two mobile parks operators who are interested in acquiring the site prompted a planned asset review. The review of assets would include potential expenditure, current management arrangements including resident feedback, and ownership. Any potential new owner would condition any offer to purchase as subject to a land survey. At the same time Huntingdonshire Housing Partnership, as managing agent, had enquired about the Council's risk assessment of the land.
- 2.6 The contaminated land survey was therefore commissioned, in June 2005, both to investigate the land in accordance with the Council's

contaminated land strategy and to inform a review of the mobile home site as an asset.

### **3. RESULTS OF THE CONTAMINATED LAND SURVEY**

3.1 The first phase began with a desk top study, looking at geological, hydro-geological and topographical maps of the area and site history.

3.2 Clay extraction pits are shown on maps of this site in 1920s. Later the land was used for landfill; before licences were needed. There was no documentary information available about the nature or extent of landfill, the maximum depth of fill nor any details of any cap formed when the landfill was complete.

3.3 The second stage involved a walk over inspection of the site and sampling. Samples were taken of soil, ground water and gases.

3.4 **Results of gas sampling.** The sampling identified elevated levels of carbon dioxide. In order to reduce the potential for the accumulation of potentially harmful concentrations of carbon dioxide beneath mobile homes at the site the consultant has recommended that where brick built surrounds have been constructed around the base of mobile homes, ventilation bricks be incorporated to achieve a minimum of 2,500mm<sup>2</sup> free area per metre run of building. A follow up survey has been arranged to establish which homes require this ventilation.

3.5 **Shallow soil quality.** The soil samples showed elevated concentrations of polycyclic aromatic hydrocarbons (PAH), including the principal 'risk driver' of this group of compounds: benzo(a)pyrene (BAP). The distribution of BAP across the site varies. However, it seems that these compounds are associated with ash and coal fragments in the fill material.

3.6 The risks posed by levels of benzo(a)pyrene in shallow soils are generally considered in terms of excess life time risk rather than short acute illness through short term exposure. The concentration, or means of determining the concentration, of benzo(a)pyrene which is considered to represent an unacceptable risk has yet to be clearly defined within current UK guidance/legislation. At the moment we cannot ascribe a risk to this substance in this location.

3.7 The investigating consultant has suggested that under current UK guidance the site will likely fall under the legal definition of Contaminated Land. However, the consultant recommended that further consultation and liaison with UK experts bodies involved with the Guidance and methodology be conducted with regard to what level of risk is considered unacceptable. A consultant with suitable expertise and connections has already been retained.

3.8 It is likely that works will be required in future to minimise the chance of any bad effect arising in the long-term. The extent of any remedial works will depend on the risk that is posed and so this is also unknown at the moment. A consultant has been commissioned to work on this issue and we should know more by the end of the year.

- 3.9 In the meantime the consultant has advised that the potential for exposure can be reduced through simple precautions such as thorough cleaning of hands before eating, etc (particularly in the case of small children), wearing gloves while working in shallow soils/gardening and not growing vegetables within shallow soils. This advice has been supplied to every household on the mobile home park.

#### **4. THE PROCESS OF DETERMINING IF THE LAND IS CONTAMINATED**

- 4.1 Responsibility for the regulation of contaminated land has been delegated by the Council to the Licensing and Protection Panel and is carried out by the Environmental Health Services Division. They will consider whether the site, or part of the site, is contaminated. Each plot could be regarded separately. The Regulator is seeking the advice of a specialist consultant who has links to the government's task force that is considering risks posed by compounds such as BAP. Advice should be available by the end of 2005 that will allow a determination to be made.
- 4.2 If the site is designated as 'contaminated land' then the land owner (the Council) will need to prepare a remediation strategy for approval by the Regulator. Once approved, and finance is available, works can commence.

#### **5. RESIDENT CONSULTATION/INVOLVEMENT**

- 5.1 Residents were informed in advance, by letter, of the survey. All residents of the site plus local ward members were invited to a meeting held during the evening on 6<sup>th</sup> October 2005 to be given feedback on the consultant's findings, and the next steps. Thirteen of the fifty mobile homes on the site were represented. Following the meeting a letter was sent to each mobile home providing information on the main findings of the survey of elevated levels of carbon dioxide and benzo(a)pyrene together with the next steps together with health and safety advice by way of a dos and don'ts sheet. A help line telephone number to deal with enquiries from residents has been established.

#### **6. POTENTIAL FOR RESIDENT DISRUPTION DURING ANY WORKS**

- 6.1 The remediation strategy will need to deal with health and safety arrangements for the protection of residents during the works. Methods for the control of dust will need to be in place. The depth of excavation required will determine whether the homes can safely remain on their concrete bases. The duration of the works and the ability to provide safe access/egress to their homes are key determinants of whether residents should be temporarily decanted. Measures to avoid decanting of residents, whilst preferable, would be reflected in the tender prices.
- 6.2 If decanting of tenants is required then local homes would need to be identified and reserved for this purpose. Homes would need to be fully furnished because mobile homes and park homes have integral white goods and bedroom fitments which could not be removed from the mobile homes.
- 6.3 To avoid local houses (which are short in supply) being reserved and furnished for the decanting of residents a decision could be taken to buy

sufficient park homes from residents to facilitate the decanting of residents on a phased basis. This would give easier and improved arrangements for health and safety during the works and avoid furnishing arrangements because they are usually sold as self sufficient. This would give the added benefit of residents living in the same location compared to potential wider displacement leading to additional inconvenience and disruption, which could result in higher claims for compensation. The mobile/park homes could be sold on completion of the works. It is estimated that the purchase of up to five mobile/park homes would be the minimal amount to provide a suitable work programme for contractors. The homes currently being marketed are advertised at £79,500, £78,500 and £77,500.

## **7 FINANCIAL MATTERS**

- 7.1 The cost of any works will be dependent on the amount, if any, of the site that needs to be remediated. If the land is determined as 'contaminated land' by the Regulator the land owner has to prepare a remediation strategy and submit it to the regulator (within 12 weeks) setting out what will be done, and the timeframe in which it will be done.
- 7.2 Preparing a remediation strategy is specialist work. It will be necessary to employ a consultant to propose a remedial strategy in accordance with government guidelines. The depth of agreed ground remediation is key to the determination of cost, as is the extent of capping required to form any necessary barrier. Some parts of the site may require remediation to different depths; some areas may require a capping layer below the ground, other areas may not.
- 7.3 The government has a Contaminated Land Capital Projects Programme (CLCPP) available which can grant Supplementary Credit Approvals in support of work which is undertaken to remediate contaminated land. The support is based on increasing a Council's government 'grant' sufficiently to allow them to make the repayments on a loan of the accepted sum. All things being equal, a questionable assumption in the field of government 'grant', there would be no net cost to the Council in relation to the amount accepted by the government.
- 7.4 The funds in the CLCPP are limited and have to be bid for. Whilst there is a good chance that 100% support will be available, this cannot be guaranteed if a large number of high priority bids are received.
- 7.5 It is not possible to predict within any degree of accuracy the likely costs until a remediation strategy has been agreed with the Regulator and works tendered. However, the costs could exceed £1m.
- 7.6 In addition to the remediation costs provision needs to be made for the following, which do not appear to be eligible for government support.
- New planting/landscaping
  - Moving and replacing mobile/park homes, as required, on their plots (including disconnection and reconnection of services)
  - Potential decanting of residents
  - Compensation to residents

## **8. CONCLUSIONS**

- 8.1 The site has elevated levels of carbon dioxide. The solution is relatively straightforward and will be put in hand.
- 8.2 The site has elevated levels of benzo(a)pyrene. The concentration, or means of determining the concentration, of benzo(a)pyrene which is considered to represent an unacceptable risk has yet to be clearly defined within current UK guidance/legislation.
- 8.3 The Regulator has yet to make a determination as to whether the land is 'contaminated land'. This determination should be made by the end of 2005.
- 8.4 If the land is contaminated then the Council as land owner would need to submit a remediation strategy for approval to the Regulator. The cost of remedial works has yet to be determined but could exceed £1m. To this needs to be added the cost of the works described at paragraph 7.6. Government financial support is likely to be available to meet the revenue impact of the remediation works.

## **9. RECOMMENDATION**

- 9.1 That the report be noted.
- 9.2 Further reports be presented to Cabinet on the determination of the land, issues arising and the next steps.

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### **Background Documents:**

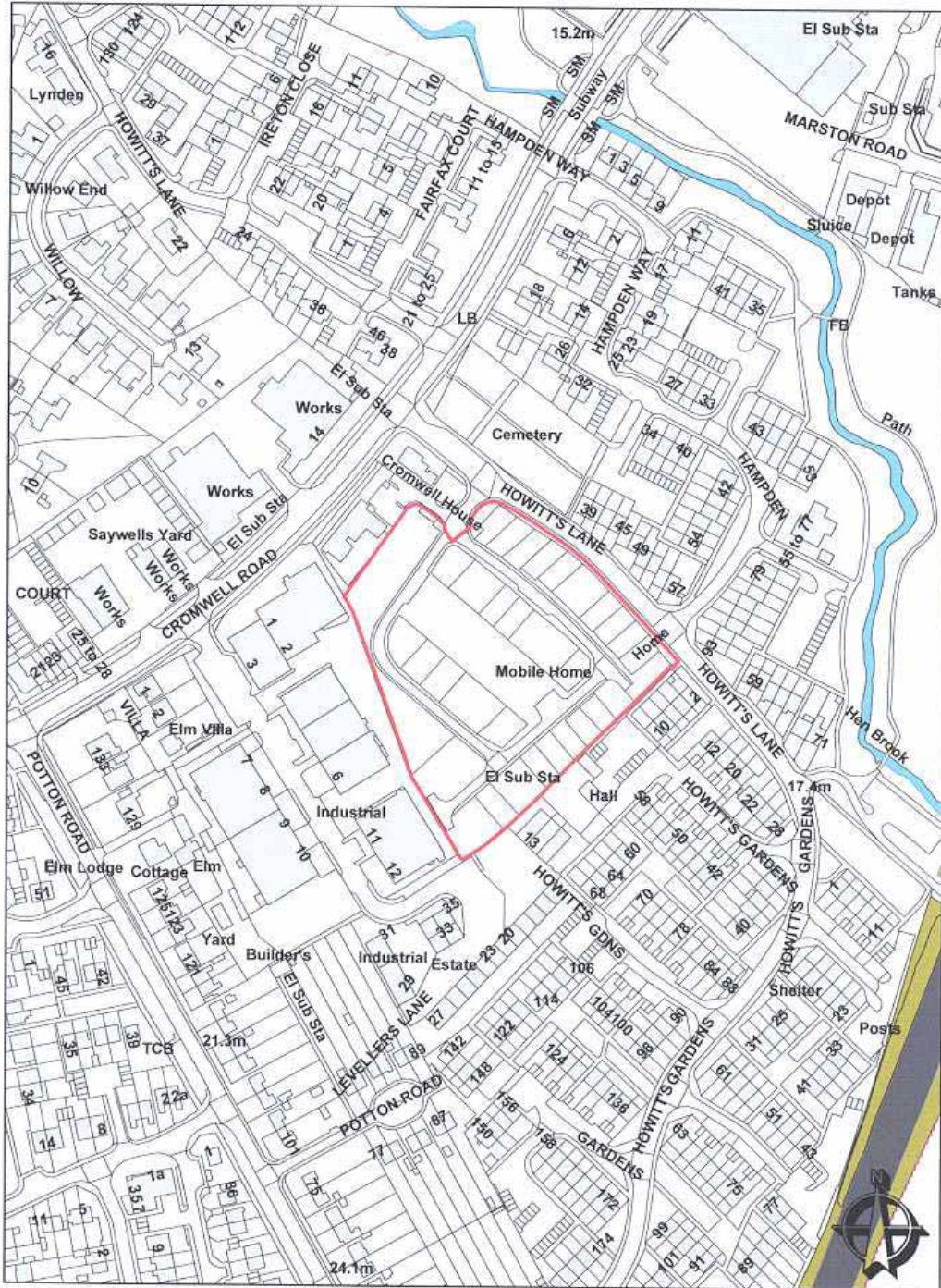
A Strategy for the Inspection of Huntingdonshire for Contaminated Land-  
**Environmental Protection Act 1990 Part IIA**, June 2001:

[<http://www.huntsdc.gov.uk/NR/rdonlyres/3AF6F307-706E-47AE-A83B-4CB1C757D651/0/ContaminatedLandStrategy.pdf>]

Environmental assessment Report: St Neots Mobile Home Park, Eynesbury, Cambridgeshire. Prepared for: Huntingdonshire District Council by Environmental Protection Strategies Ltd of Cambourne (30 September 2005)

Plan Note 2/05 – [defra.gov.uk/environment/land/index.htm](http://defra.gov.uk/environment/land/index.htm)

# Mobile Homes Park, Howitts Lane, St Neots



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**Huntingdonshire**

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