

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/20/03345	Your Ref:	APP/20/00966
EH Case Officer Extn:	44 6677	Date:	05 November 2020
DC Case Officer:	Steve Weaver		
DC Case Officer Extn:	44 6512		
Application Number:	APP/20/00966		
Site Address:	Southleigh Park House, Eastleigh Road, Havant, PO9 2PE		
Proposed Development:	Demolition of 1983 office building and associated brick and glass corridor link		

Observations / Comments:

I have reviewed the demolition method statement (DMS) & cover letter, alongside prior comments given by Environmental Health in respect of the outline consent. I would like to provide some brief comments for completeness;

Asbestos

It is recognised that there is a reasonable prospect of asbestos being used within the fabric of the building. I note that the DMS confirms that an asbestos survey will be undertaken prior to the soft strip, and that asbestos removal will be subject to a risk assessment method statement (RAMS).

Asbestos within the building is not a 'contaminant', and its removal will appropriately fall under the Control of Asbestos Regulations (CAR), for which the HSE is the regulator. I note that Suitable dust control specified, staff are 'asbestos awareness' trained, and that the extant consent (APP/17/00863) requires a ground investigation as a condition of development - meaning that any significant deposit to land would be addressed prior to development commencing.

In line with the above observations, I see no need for additional planning controls in respect of asbestos.

Hazardous Substances and Unexpected Contamination

Unexpected contamination might conceivably be identified during the course of demolition works. The site is not especially sensitive to contamination in its present state, and the conditions applied to APP/17/00863 were required as a result of the change in risk status represented by the consented change of use. It is appropriate to rely upon the conditions of the extant consent to address any contamination that might come to light through the course of demolition. Unacceptable acute risks to demolition personnel are considered to be unlikely to arise, and it is considered appropriate to rely upon routine health & safety controls to manage this risk.

The is Discovery of potentially hazardous substances during the proposes works is identified as a risk within the DMS. This is potentially more relevant, given the previously noted potential for historic military use of the site. On the assumption that the conditions applied to the 2017 consent will not apply to any consent given for demolition, I would suggest that it would be prudent to transfer the UXO watching brief condition to any consent awarded in respect of this application. Wording reproduced below for completeness with required contextual amendments:

Condition [1] - UXO & UXB (Desk Study & Watching Brief)

"Prior to the commencement of demolition approved by this Planning Permission, a desk based study to assess the likelihood of the presence of historic unexploded ordnance (UXO) or bombs (UXB) shall be submitted to and approved in writing by the Local Planning Authority. Where non-trivial potential for the presence of UXO/UXB has been identified at the site, the study shall include details of a protocol for the identification and assessment of possible ordnance that may be disturbed during construction (a 'watching brief')."

If, during development, any suspected historic ordnance (UXO/UXB) is found to be present, no further development shall be undertaken until the object has been assessed by an appropriately qualified person, appropriate actions taken to remove or make safe the object, have been undertaken, and the Local Planning Authority notified.

The provisions of the approved 'watching brief' shall be observed throughout the undertaking of all relevant demolition activities (e.g. below ground works – breaking slabs, grubbing up foundations, excavations & removal of buried services)"

Reason: *The site is adjacent to former military fortifications, potentially indicative of active use of the extant residence &/or estate during the 2nd World War, e.g. for training and staging purposes, by regular forces or home guard activities. The presence of unexploded ordnance is not considered implausible. To manage the potential associated risk to both groundwork personnel & future residents, and having due regard to policies DM10 of the Havant Borough Adopted Core Strategy [2011] and DM17 of the Havant Borough Local Plan (Allocations) [2014]*

(please note, some UXO management companies offer preliminary risk assessments based upon historical records that are either free or at very low cost).

Nuisance & Amenity Issues

Comments are anticipated to follow under separate cover from one of my Environmental Health colleagues who specialises in nuisance. It is anticipated that 'hours of works' and 'prohibition of burning of waste materials' informatives will be requested.

Comments above should be read without prejudice to any provided under separate cover.

Mr. Jonathan Driver
Environmental Control Officer