

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/17/01873	Your Ref:	APP/17/01001
EH Case Officer Extn:	44 6677	Date:	06 October 2017
DC Case Officer:	David Eaves		
DC Case Officer Extn:	44 6549		
Application Number:	APP/17/01001		
Site Address:	Colt International Ltd, New Lane, Havant, PO9 2LY		
Proposed Development:	Application to determine whether prior approval is required for the method of demolition of buildings including slab removal and any proposed restoration of the site.		

Observations / Comments:

I have reviewed the planning statement for this application in connection with the release of harmful pollutants, and within the context of the contamination assessment. Mark Moss will be providing comment as regards nuisance.

Asbestos

The identification of asbestos containing materials within the building fabric is noted, and is not unexpected. The procedures referred to in relation to the removal & disposal of this material are indicated to be appropriate, and the monitoring and clearance procedures robust.

This could be methodology that the LPA might wish to formalise, as the operational details and verification of the works would otherwise not be subject to approval. Provided that the planning statement can be regarded as sufficient statement of intent such that the Council may have a reasonable expectation that the broad principles outlined will be followed; I would be fairly comfortable to leave these details to the applicant & their nominated contractors, for the following reasons;

- The site has no immediate residential neighbours, and;
- Further contamination assessment is recommended, which should identify any significant quantities of asbestos containing materials released as fragments / free-fibres to soils.

Contamination

The contamination assessment report (environmental desk study, site walkover and preliminary intrusive investigation) was reviewed as part of the GEN application. Potentially significant sources were identified as being present at the site, and further characterisation of the contamination sources, and risks was proposed.

I agree with the conclusions of the report in this regard, though there are points of difference as to the perceived significance of some routes of exposure and risks to receptors of particular classes..

In particular, the risks to controlled waters (surface waters) may be understated, due to the proximity to the site, and due to the presence of connecting surface water drainage infrastructure.

I note that there may potentially be some archeological concerns in connection with excavations at the site, though I gather that the area of interest does not coincide with the footprints of the principal buildings. I also note that the stated principle purpose for the demolition is to eliminate the risk of trespass, injury, the building becoming insecure or left in dangerous or deleterious condition as a result of theft, and to mitigate the risk of arson. This is expressed in both these terms, and in terms of the security costs, which will be reduced commensurate with the reduced risks upon completion of the demolition works.

It strikes me that to achieve these aims, there is no particular requirement to go further than removal of above-ground structures. The submitted statement indicates that the West Car Park Hardstanding is to be stripped as a part of the works, and also indicates that aquifer risks are negligible due to the lack of any penetrative works. It is non-specific however about the scope of works as regards the removal of below ground infrastructure (e.g. storage tanks and associated pipework, storage areas, services), or the grubbing up of foundations / removal of slabs.

Significantly changing the proportion & position of impermeable ground cover at the site, especially if associated with physical disturbance; could mobilise contamination. The site is adjacent to a controlled water (the controlled water may in fact be present just within the curtilage), and is believed to have a direct connection to the surface water in the form of the 'monsoon' land drain. Other preferential migration pathways may exist at the site which also place the surface water at elevated risk from the demolition and site preparation works.

For these reasons, I would recommend that the applicant limit works to the removal of above ground structures, leaving slabs and hard-standing in place at this stage. This would serve to:

- preserve the site, and prevent demolition works prejudicing further development of the conceptual site model in connection with further ground investigation works.
- limit changes in infiltration and run-off rates (minimise hydrological mobilisation)
- limit physical disturbance of soils (minimise mechanical mobilisation)

This approach would also serve to limit impact on any archeology that may be present at the site.

There are benefits to the completion of above ground demolition prior to the undertaking of further site investigation, and so pre-investigation demolition is supported in principal.

If the applicant can confirm that works will be limited to above ground structures, then I have no adverse comments to make.

However, if the applicant requires a complete site (ground cover strip), and extensive sub-surface works, then I would consider that approval is required for the method of works and site restoration in order to ensure that the environmental impact of such works is minimised.

Mr. Jonathan Driver
Environmental Control Officer