

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/24/01690	Your Ref:	APP/24/00053
EH Case Officer Extn:	44 6677	Date:	04 July 2024
DC Case Officer:	Steve Weaver		
DC Case Officer Extn:	44 6512		
Application Number:	APP/24/00053		
Site Address:	Multi Storey Car Park, Bulbeck Road, Havant, PO9		
Proposed Development:	Application to determine whether prior approval is required for the method of demolition of multi storey car park including slab removal and the proposed restoration of the site.		

RECONSULTATION REQUEST for revised plans and/or documents received

Observations / Comments:

I have reviewed the recent submissions; Demolition Method Statement (DMS), Environmental Management Plan (EMP), Health & Safety Plan (H&SP), and Risk Assessment Register (RAR).

I note that both the EA & Portsmouth Water Company are content with the submissions, and have raised no objections, and I broadly support those comments insofar as they relate to the control of pollution to surfacewaters.

I also note that both the Highway Authority and my nuisance & amenity focussed Environmental Health colleague has required amendments be made to the documentation to strengthen protections & to elevate awareness among both management & staff working on site.

I have previously commented that *'It is expected that the recommendations of the OMNIA report would apply to the demolition works as if they were the development stage – referring specifically to maintaining vigilance for contaminated materials (encountered on site or brought onto site under a DoWCOP materials management plan), and the procedure for investigation & notification of the Regulator(s)'*

Provisions are not expressly addressed within the DMS, EMP or the H&SP in this respect. The H&SP addresses roles & responsibilities for various tiers of management (section 14), and the content of training & regular toolbox talks (section 15), missing opportunities to raise awareness of OMNIA's recommendations. Communications are covered at section 16, but the focus is upon contractor management and health and safety regulators, and this section does not provide for notifications to other regulators.

The Contamination Watching brief (OMNIA Report) is only linked to the recent submissions via

item 37 of the general RAR.

I am cautious of advocating for further rounds of re-consultations, but given that the requirements of others necessitate some document revisions; it would improve the likelihood of effective exercise of the OMNIA recommended contamination watching brief if some markers were placed within the EMP and the H&SP – e.g. to include ‘discovery of suspected hazardous substances (or contaminated material)’ within the managerial responsibilities, site induction &/or toolbox talk subject list. It would also be helpful to include a note on the notification of relevant environmental authorities (EA & EH) upon discovery.

Otherwise, I would reiterate prior advice – given the conclusions of the intrusive ground investigation, I see no reason to seek to tightly control the method or extent of the demolition of the structure.

Mr. Jonathan Driver
Environmental Control Officer