

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/16/01508	Your Ref:	APP/16/01061
EH Case Officer Extn:	44 6677	Date:	31 October 2016
DC Case Officer:	David Eaves		
DC Case Officer Extn:	44 6549		
Application Number:	APP/16/01061		
Site Address:	32 New Lane, Havant, PO9 2NG		
Proposed Development:	Application to determine whether prior approval is required for the method of demolition of building including slab removal and any proposed restoration of the site.		

Observations / Comments:

I have reviewed the supporting information to this application, previous applications relating to this site, and the available spatial resources. It is understood that Laurent has already provided comment on noise / dust; comments here will relate to contamination only.

Whilst building V is presently used as offices & for staff welfare facilities, at the time of construction (ca. 1955-1960) it formed the principal production unit. The particulars of internal use of this unit are not known, but it is assumed at this stage that there is a tangible likelihood that the storage / handling of potentially contaminating materials (or undertaking of potentially contaminating processes) have been undertaken within the building at some point over its 55 year (+) history. It is also considered probable that the fabric of the building will comprise of materials of which a notable proportion will be asbestos containing (ACM).

ACM within buildings is not contamination (rather is potential pollution), and is appropriately controlled under the Control of Asbestos Regulations 2012. In this regard there is no need for a planning control (e.g. approval of asbestos survey & remedial work). It is appropriate however to make clear (by means of these comments) that it is expected that appropriate steps will be taken to identify all asbestos containing materials within the building, and that identified materials will be appropriately managed prior to commencement of demolition; in order to prevent those materials becoming a soil contaminant.

A previous site investigation has been undertaken in this area (circa. Jan 1997), identifying elevated concentrations of petroleum hydrocarbons, phthalate, poly-aromatic hydrocarbons, toluene, and acetone. I have not undertaken a detailed review of the previous site investigation to determine the source distribution in relation to Building V, or indeed whether sufficient data points are available to enable a meaningful conclusion to be drawn as to the likelihood of presence of significant contamination in the vicinity of its footprint.

It is however known that other site investigations undertaken in the vicinity of the site have

identified migration distances in the order of 150m (phthalates), serving to highlight the risk of contaminant mobility within the local geology of this area.

It is acknowledged that the site is-, and is to remain- in industrial use, and account has been taken of the permanent decommissioning of the water supply wells on the allotment site 300m to the South. The closest relevant receptors are therefore considered to be Site Workers, a surface water course (Main River, Lavant) - 100m to the North-West, and residential property 55m East. Hydraulically, the surface water & residential property could theoretically be down-gradient, though it is believed that groundwater flow is more likely to be to the South.

There is a risk that contaminants exist at the site, in the vicinity of or under Building V. Removal of that structure may alter the local hydrological regime through the removal of impermeable cover. Completion of the site in a water permeable root barrier membrane would make this change long-terms, and could result in the mobilisation of existing contamination. Given the distance to down-gradient receptors, an impact at a relevant receptor as a direct result of this demolition is not likely to be evident for many years - in this sense the risk is more of a civil one (in terms of the cost to adjacent land owners of addressing contamination originating from this site), and in this way, the risk & liability resides with the applicant is not necessarily a planning concern per-se.

I cannot comment on the need or otherwise for planning consent for this scheme, however I can confirm that at this stage (i.e. based upon the information available to me) I do not consider the risk to sensitive environmental receptors to be sufficiently great as to require that contamination be assessed prior to the commencement of these works. On this basis, I have no objections, however I would recommend that the applicant consider any prior intrusive investigations undertaken at the site with a view to either satisfying themselves that the mobilisation risk is acceptable, or identifying the necessary steps to addressing any unacceptable risks (e.g. impermeable ground cover or remedial works).

In the event that consent is required for these proposals, I would propose a robust watching brief condition, requiring that any suspicious ground conditions or suspected contamination be properly identified *only if encountered*. I can forward suggested wording in this eventuality.

It is also worth reiterating that any further development of this site that involves the excavation of- or construction of new units on- this land would however require some intrusive investigations for the purpose of assessing the current degree of contamination and risk to the receptors stated above; on the basis that it new construction will hamper (if not prevent) access to address any contamination sources present on site, and that it would not be clear that the site is (safe & suitable for use) until the ground conditions have been characterised.

I trust this meets with your requirements, please don't hesitate to contact me if you need anything further.

Mr. Jonathan Driver
Environmental Control Officer