



Planning
Havant Borough Council
Public Service Plaza
Civic Centre Road
Havant
PO9 2AX

Via Planning Portal
PP-13343399
Our Ref: UK-70084044
9 September 2024

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) ORDER 2015
FORMER GAS MANAGER'S HOUSE, FORMER EMSWORTH HOLDER STATION, PALMER'S
ROAD, EMSWORTH, HAMPSHIRE, PO10 7DL**

On behalf of VHE and SGN, please find enclosed an application made under Class B of Part 11 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) (herein "The Order") for a determination as to whether prior approval is required as to the proposed method of demolition of a building at the above site.

The following documents are provided in support of the submission:

- ♣ Prior Notification Application Form;
- ♣ Site Location Plan showing building to be demolished;
- ♣ Site Layout Plan showing building to be demolished;
- ♣ Method of Demolition Statement (MDS) prepared by VHE;
- ♣ Construction and Environmental Management Plan (CEMP) prepared by VHE;
- ♣ Bat Survey (MDS Appendix 4);
- ♣ Asbestos Survey (MDS Appendix 3); and
- ♣ Demolition Notice Statement;
- ♣ Copy of Site Notice (for information purposes only);

The scope of the submission was agreed with the Council in formal written pre-application advice (ref: GEN/24/00823) prior to the preparation of this application.

The planning application fee of £120 has been paid online via the Planning Portal.

The relevant site notice has been displayed on site.

BACKGROUND

SGN is the freeholder of the site at Palmer's Road, which is a former gasholder site, and it has appointed VHE to undertake remediation works, due to 3no. primary sources of contamination on the site that are considered to require remediation. The remediation works are proposed in preparation for the wider site being disposed of for future development by others.

The primary sources of contamination include the following:

- ♣ Foul lime (cyanides), hydrocarbons;
- ♣ Leachable cyanides and asbestos lagging; and
- ♣ Free phase tars, asbestos cement.

The most appropriate remediation solution for these has been identified as being source removal and environmental betterment. As such, the excavation of these three sources of contamination

impact followed by off-site disposal at either a licensed landfill or treatment centre is the proposed remediation strategy.

In written pre-application advice (ref: GEN/24/00823) dated 28 August 2024, the Council confirmed that these remediation works benefit from permitted development rights under Part 15 (Power Related Development) Class A (Gas Transporters) of the Order.

Notwithstanding this, there is an existing building on site (which was formerly the gas manager's house), as shown on the enclosed Site Location Plan and Site Layout Plan. Prior to the remediation works taking place, SGN and VHE intend to demolish the existing building. Therefore, as required by Part 11 (Heritage and Demolition) Class B (Demolition of Buildings) of The Order, this application seeks a determination as to whether the prior approval of the authority is required, and if so, whether that approval is forthcoming.

The proposed demolition works will be undertaken as soon as possible, subject to prior approval being and a Protected Species Mitigation License being granted, and prior to bat hibernation season commencing in November 2024. The demolition works will take approximately 20 days.

PROPOSED DEMOLITION

The enclosed Method of Demolition Statement (MDS) prepared by VHE explains the demolition process proposed for the existing building on the site, including preparatory works and risk assessments associated with the process. Demolition will take place from roof down to floor level, with all hardcore, bricks and wood separated into appropriate skips.

The MDS explains that an asbestos survey has previously identified asbestos containing materials inside and outside the property, and the method of demolition will take cognizance of the asbestos survey under the supervision of a licensed asbestos operative. The asbestos survey is enclosed with this application.

Furthermore, the MDS also explains that a Bat Survey has been undertaken, including three emergence surveys in September 2023, and June and July 2024. The survey found that a single bat species was using the building as a roost, with a total of three individual seen to emerge all during the September visit. No bats were seen to emerge from the building during the June and July surveys but were seen in the area and foraging within the site. The roost was classified as a transitional / occasional day roost. A Protected Species Mitigation License will be applied for through Natural England prior to any site clearance or demolition works which shall also incorporate bat mitigation measures as detailed within the Survey Report which is enclosed with this application.

A CEMP is enclosed with this application which outlines the environmental control and monitoring to be implemented during the remediation and demolition works. Table 1 of the report sets out various hazards, receptors, control and mitigation measures, and monitoring to be implemented. Some of the hazards include:

- ♣ Release of harmful odours and vapours;
- ♣ Loss of ecological importance;
- ♣ Generation of dust;
- ♣ Generation of excessive vibration level;
- ♣ Generation of excessive noise levels;
- ♣ Leakage or spills of fuel or chemicals on to site; and
- ♣ Mud on roads from off-site transport of hazardous waste.



This application and the supporting documents demonstrate that VHE and SGN have fully considered, and will manage, the risks and associated potential impacts of the proposed demolition.

The remediation of the site, as discussed above, will be undertaken following the completion of the demolition works.

CONCLUSION

We trust the enclosed is sufficient and look forward to the receipt of the validation of the application. We consider that the council can reasonably conclude that prior approval is not required and that the development can be carried out in accordance with the details submitted in this application.

Whilst we acknowledge that the local planning authority has 28 days to determine whether prior approval is required, it would be greatly appreciated if the application could be determined as soon as possible.

Should you have any queries or require any further information, please do not hesitate to contact me.

Yours faithfully

A large black rectangular redaction box covering the signature and any accompanying text or stamp.