

- 3.2 The application is submitted for demolition under the Town and Country Planning (General Permitted Development) (England) Order 2015 as amended, ("GPDO") Schedule 2, Part 11 Class B - the relevant parts of which for this consideration state:

Class B – demolition of buildings

Permitted development

B. Any building operation consisting of the demolition of a building.

Conditions

B.2 Development is permitted by Class B subject to the following conditions—

(b) where the demolition does not fall within paragraph (a) and is not excluded demolition—

(i) the developer must, before beginning the development, apply to the local planning authority for a determination as to whether the prior approval of the authority will be

required as to the method of demolition and any proposed restoration of the site;

(vii) the development must not begin before the occurrence of one of the following—

(aa) the receipt by the applicant from the local planning authority of a written notice of their determination that such prior approval is not required;

(bb) where the local planning authority give the applicant notice within 28 days following the date of receiving the application of their determination that such prior approval is required, the giving of such approval; or

(cc) the expiry of 28 days following the date on which the application was received by the local planning authority without the local planning authority making any determination as to whether such approval is required or notifying the applicant of their determination;

(viii) the development must, except to the extent that the local planning authority otherwise agree in writing, be carried out—

(aa) where prior approval is required, in accordance with the details approved;

(bb) where prior approval is not required, in accordance with the details submitted with the application;

- 3.3 The application has been submitted with the following supporting information:

- Health and Safety Plan
- Demolition Method Statement
- Environmental Management Plan
- Risk Assessment Register
- Written Scheme of Investigation for Archaeology
- Preliminary Ecological Appraisal and Roost Assessment
- Bat Emergence Survey Report
- Response to Public Comments

3.4 The overall scope of works outlined in these documents is one whereby after erecting hoarding around the site and scaffolding and sheeting around the building, there would be a strip-out of the buildings and COSHH assessment, followed by the demolition of the building and clearance of the arisings. There would then be the removal of the slabs and foundations and clearance of those arisings. Once completed, the site would have a solid timber hoarding erected around the perimeter with a set of double gates, providing a secure barrier until the site is developed. Holes in the hoarding will be provided to allow the public a view of the site when it is being developed.

3.5 It should be noted that in order to facilitate the installation of scaffolding and sheeting to suppress dust emissions, where this lies adjacent to the western elevation of the structure it is proposed that the hoarding be installed partly within the adjacent South Park Court parking area. This will have the effect of removing 10 car parking spaces from use for the duration of the demolition activity.

4 Policy Considerations

National Planning Policy Framework

Havant Borough Regeneration and Economy Strategy 2022-2036

Havant Borough Council Borough Design Guide SPD December 2011

Havant Borough Council Parking SPD July 2016

Havant Borough Local Plan (Core Strategy) March 2011

Havant Borough Local Plan (Allocations) July 2014

Emsworth Neighbourhood Plan Post Examination Version 2020

N/A

Listed Building Grade: Not applicable.

Conservation Area: Not applicable.

5 Statutory and Non Statutory Consultations

Building Control, Havant Borough Council

Building Regulation consent might be required for this work depending on size and the need to comply with Section 80 Demolition of a structure if less than Buildings under 1750 cubic feet consent would not be required

Conservation Officer

No comments received.

Councillor Gillian Harris

No comments received.

Former Councillor Imogen Payter

No comments received.

Councillor Phil Munday - St Faiths

No comments received.

County Archaeologist

Initial consultation response

Thank you for your consultation. The site lies within the historic core of Havant and within an area of high archaeological importance. This area of Havant has been settled since at least the Roman period, with a small Roman town developing around a crossroads, centred approximately 100m to the northeast of the site. The projected course of the east/west Roman road, which defined part of the crossroads, passes 50m to the north of the site. Although some recent works have uncovered evidence of the Roman town (in the form of artefacts and buildings elements), a paucity of archaeological investigations within in the centre of Havant has resulted in little being known about the Roman development of this archaeologically significant settlement. Later occupation of the town throughout the early-medieval and medieval periods is also poorly understood but is important in understanding the development of modern Havant.

Whilst the development of the multi-story car park is likely to have created some negative impacts within the site, this is unlikely to have completely removed the archaeological potential, with archaeological remains often surviving in between foundation piers or rafts. Even in areas of the site that have been subjected to greater levels of previous impacts, the archaeological potential could still be retained. Whilst the previous development of parts of the site may have truncated some archaeological remains, there is still a potential for remains to be present at deeper levels (such as the deeper strata of archaeology or lower portions of truncated pits, wells etc). Given the location of the site, there is a high potential that important archaeological remains relating to the development of Havant may be present, including evidence of the Roman settlement as well as early medieval and medieval development of the town. The archaeological potential is for evidence of occupation, as well as evidence that might shed light on to the date at which the grid of streets were laid out and for evidence regarding the trades and industries practised in historic Havant. Given the nature of historic urban development, it is likely that there will be relatively deep strata of archaeological deposits.

The demolition of below ground elements of the car park (referred to in the submitted method statement as 3.4 – Substructure Demolition) has a high risk of exposing and destroying archaeological remains. In particular, the removal of the slab and the grubbing out of foundations would have a severe negative impact on any archaeological remains which might be present. I am unsure as to the mechanics of the prior-approval process and would defer to the knowledge and experience of the planning authority, but I believe that it would be appropriate for any demolition, as described, to include reasonable steps to ensure that archaeological remains are not needlessly destroyed without record. This should take the form of archaeological monitoring of the substructure demolition and subsequent reporting, in accordance with an agreed written scheme of investigation. Given that the site is proposed to be re-developed, there is the possibility that these results would have a bearing on the design of the development and determining the treatment of archaeological remains in any future application.

Further consultation response following submission of additional information

Thank you for your consultation regarding the additional documents submitted in support of this application. Having reviewed the submitted written scheme of investigation for archaeological monitoring, I can confirm that I endorse the document and believe that it represents appropriate archaeological mitigation. The implementation of this proposed scheme of mitigation should be secured through condition or by other means.

Ecologist, Planning Policy Team

Initial consultation response

Thank you for consulting me on this prior approval application submission.

The proposal would be unlikely to result in significant ecological impacts, but there is potential for the site to support legally protected species such as roosting bats and nesting birds. The existing building is extensive and may exhibit suitable bat access/egress and bird nesting locations, despite its relatively modern construction: I would expect the likelihood to be low but I am unable to state at this stage that likelihood is negligible..

I would recommend that the applicant provides an ecological assessment, to be provided by a qualified ecologist. The Chartered Institute of Ecology and Environmental Management (CIEEM) (www.cieem.net) holds a database of suitably qualified ecologists. An ecological assessment will determine whether there is any evidence of protected and notable habitats and species, and whether the proposed works are likely to result in impacts to those habitats and species. Unless the qualified ecologist can conclude that there is no reasonable likelihood of protected habitats and species being present (due to negligible potential) or that if present they are not to be impacted by the works, it is likely that further ecological survey work will be required prior to determination of any application. The results of any further surveys should be used to provide an assessment of the likely ecological impacts of the proposed works and to inform any mitigation, compensation and enhancement measures. I would expect the redeveloped site to include biodiversity enhancement features such as bird and bat boxes and for landscaping proposals to include appropriate native species plantings.

NPPF, Circular 06/2005 and Natural England Standing Advice, require that planning decisions are based on full, up-to-date ecological information and it is essential that all necessary survey, assessment and mitigation information is available to the Local Planning Authority prior to determination, particularly in the case of protected sites, habitats and species, which are a material planning consideration. This will enable the Local Planning Authority to determine the application on the basis of full knowledge about the potential ecological impacts of the proposal and to ensure that any impacts can and will be mitigated.

Further consultation response following submission of additional information

Thank you for consulting me on this application.

The application is accompanied by a Preliminary Ecological Appraisal and Roost Assessment (Arbtech, March 2024). The building is considered to offer bat roosting potential, and further survey works have been recommended. I concur with this assessment. The additional surveys should be completed prior to determination.

NPPF, Circular 06/2005 and Natural England Standing Advice, require that planning decisions are based on full, up-to-date ecological information and it is essential that all necessary survey, assessment and mitigation information is available to the Local Planning Authority prior to determination, particularly in the case of protected sites, habitats and species, which are a material planning consideration. This will enable the Local Planning Authority to determine the application on the basis of full knowledge about the potential ecological impacts of the proposal and to ensure that any impacts can and will be mitigated.

Final consultation response following submission of bat surveys

Thank you for consulting me on this application.

The application is now accompanied by a Bat Emergence and Re-Entry Surveys (Arbtech, June 2024). The building was considered to offer bat roosting potential, and further survey works were recommended.

Two evening bat emergence surveys were carried out in May and June 2024. No bats were observed roosting within the building and it is concluded that roosting bats are not currently a constraint. No further bat survey works are necessary.

The bat report provides some sensible and proportionate recommendations for ecological impact mitigation as well as enhancements. Matters of ecological enhancement such as bat roosting and bird nesting features can be addressed within any future application for redevelopment of the site. The report highlights that the building remains potentially suitable for roosting bats and that a precautionary method of removal for specific building features is required.

If you are minded to grant permission, can I suggest that all ecological avoidance and mitigation measures are secured.

Development shall proceed in accordance with the ecological avoidance and mitigation measures detailed within the Bat Emergence and Re-Entry Surveys report (Arbtech, June 2024) Reason: to protect biodiversity in accordance with the Environment Act 2021, Conservation Regulations 2017, Wildlife & Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS 11 of the Havant Borough Core Strategy March 2011.

Economic Development

No comments received.

Engineering/Drainage

No comments received.

Environment Agency

We have no objection to the proposal as submitted.

Flood risk standing advice supplied.

Environmental Control Officer

Initial consultation response

It is assumed for the purposes of this consultation that the application concerns the method of demolition only and that the application does not seek permission to demolish the structure.

On this basis, whilst some of the points raised by public consultees could find policy support on Air Quality grounds, no further comments are offered in this respect.

Contamination/Pollution

I note that both the Environment Agency & Portsmouth Water Company have raised the sensitivity of the Groundwater environment at this site. The Portsmouth Water response is particularly useful in that it confirms that the spring present within the planning red-line area does not contribute to the public potable supply.

Otherwise, the call for the Demolition Environmental Management Plan are supported, as is the Agency's recommendation to maintain open communication with Portsmouth Water Company during works in order to facilitate the active monitoring of the potable supply for turbidity issues arising.

In terms of contamination risks specifically, I have previously reviewed preliminary site investigation information (OMNIA Ph. 1 & 2 Geoenvironmental Site Investigation Ref: A12063/1.0, December 2023). That report made recommendations in respect of additional ground gas monitoring & vapour screening, alongside further investigation in the West of the site. The report recommended that there should be no impediment to the removal of the slab, but that works to remove pile caps should be limited to the east of the site only (to be retained in the West).

At the time of review, I had recommended that the further works envisaged should aim to ascertain whether there are discontinuous groundwater bodies present at the site, and/or whether artesian conditions may be present to the extent that vertical migration of contaminants from shallow soils (or water) to deeper strata.

To echo prior comments; I see no reason to seek to tightly control the method or extent of the demolition of the structure. The key question that I had ahead of the investigation was whether or not the concrete slab should remain in place (to limit mobilisation of contaminants), and the work undertaken by OMNIA was agreed to be sufficient to show that the risks associated with removing it can be regarded to be acceptable.

No objections arise.

Definition of Waste Code of Practice (DoWCOP)

I would echo the Environment Agency comments – no objection to the use of suitable materials that would otherwise be classified as waste, subject to the controls & limits outlined in the code of practice.

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).

Final consultation response following submission of additional information

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.

Environmental Health Manager

Initial consultation response

Pollution Team require that should prior approval be granted for the multi storey car park, the consent should be supported by a comprehensive demolition method statement. The method statement should consider noise and vibration, including fugitive dusts, odour, and other emissions. This is to ensure the works do not have an adverse impact on the residents and the environment.

Measures should be put in place deal with wastes and all aspects of noise from vehicles movements and equipment on the site, ensuring that demolition works is contained within the site as far as is reasonably practicable. I advise that should work require a prior approval and the said is granted, the following condition may be attached.

Demolition Method statement.

No development shall commence, including demolition and site clearance works, until a Construction Management Plan (CMP), to include details of: (a) provision of boundary hoarding; (b) hours of operation; (c) means to control dust and emissions to air; (d) means to control noise and vibration has been submitted to, and approved in writing by, the Local Planning Authority. The CMP should be in accordance with the GLA's Supplementary Planning Guidance 'Control of Dust and Emissions during Demolition and Construction'. The development shall be constructed in accordance with the approved statement. Reason: To ensure that the proposed development does not have a significant adverse impact on the amenities of nearby residential properties and to minimise the impacts on local air quality.

Final consultation response following submission of construction management information

In view of the attached document relating to construction management, no further information is required from the Pollution Team.

Hampshire Highways

Initial consultation response

Thank you for your consultation on the above planning application. The Highway Authority wish to make the following comments.

The Highway Authority would require a demolition method statement to be submitted to support these works being undertaken which should cover the following:

- * A programme of and phasing of the demolition works
- * Provision of long-term facilities for contractor/operative parking
- * Number of associated vehicle movements (both for demolition works and contractors)
- * Arrangements for vehicle movements associated with all demolition works which should also provide an appropriate schedule for all vehicle movements
- * Proposed routing of vehicles associated with demolition works
- * Protection of pedestrian routes during demolition
- * Site set up for temporary site buildings required for the demolition works including compound and plant storage areas
- * Details of the methodology for ensuring that dirt is not transferred onto the highway from the site i.e. wheel washers, and onwards mitigation should this fail such as the employment of mechanical road sweepers
- * Reference to a pre-commencement survey and confirmation that any damages to the highway occurred from the demolition works and associated vehicle movements will be rectified at the expense of the applicant

The Highway Authority request this further information to be submitted to ensure that appropriate measures are put in place and agreed ahead of any demolition works being undertaken before no objections can be provided to this prior approval application.

Further consultation response following submission of additional information

Thank you for your reconsultation on the above planning application. The Highway Authority wish to make the following comments. In response to previous comments dated 16 February 2024 the applicant has submitted a 'response to highway comments' regarding the demolition activities.

The document refers to the information requested being provided within a number of separate documents. It is requested that all activities in relation to demolition works and highway interests should be included within one comprehensive document for ease of viewing and to ensure compliance with the document can easily be monitored and enforced if necessary.

Notwithstanding, in the interests of moving this prior approval application forward the Highway Authority have reviewed the relevant documents and have the following comments to make.

Programme and Phasing of the demolition works:

It is understood the works are expected to take 14 weeks with the phasing of the works outlined within section 3.3 of the Demolition Method Statement. This is noted.

Provision of long-term facilities for contractor/operative parking:

The applicant outlines that no contractor parking is to be provided on site with contractors expected to utilise other current car parking facilities within Havant Town Centre. Whilst this is considered acceptable in this instance based on the town centre location the applicant should confirm the available car parks for use of contractors. Car sharing should be encouraged where possible to minimise the number of vehicles and demand at these car parks.

Notwithstanding the above, a commitment should be provided outlining that no parking is to occur on the public highway as a result of the demolition works. Whilst it is noted that the local roads are subject to parking restrictions, the Highway Authority would expect no parking to occur on Bulbeck Road and the local highway network. This will be enforced should it become an issue.

Number of associated vehicle movements (both for demolition works and contractors):

The response to comments from the applicant identifies minimal vehicles are to leave the site in the early stages. This number of vehicle movement should be confirmed. Once demolition works commence it is anticipated c. 5 vehicle movements per day will occur during peak periods of demolition. The size of vehicles expected to service the site should be confirmed. Due to the nature of the local road network to access the site swept path analysis of the largest vehicle to access the site should be provided to ensure it can manoeuvre appropriately.

Arrangements and schedule for vehicle movements associated with all demolition works:

The commentary within section 10 of the Health and Safety Statement and activity 65 of the risk assessment does not encompass the requirements of the Highway Authority. The methods of scheduling deliveries should be outlined to ensure that due to the nature of the site more than one vehicle is not due to service the site at one time. This should be clarified within the documentation.

Proposed routing of vehicles associated with demolition works:

Section 10.11 of the Health and Safety statement outlines the proposed traffic routing however this only outlines the traffic movements once vehicles have reached Bulbeck Road. This is not considered sufficient. Wider routing for vehicles should be confirmed. This should be as direct to the site avoiding residential areas where possible.

Protection of pedestrian routes during demolition:

The existing pedestrian footpaths on the northern side of Bulbeck Road abutting the car park boundary is to be closed off and included within the hoarding for the demolition works. The applicant identifies that appropriate alternative footway provision can be utilised on the opposite side of the carriageway. Footway provision is not continuous on the opposite side of the carriageway and therefore this is not agreed to be an appropriate alternative. Suitable footway diversions should be identified and put forward to the Highway Authority. Segregated routes within the carriageway may be considered necessary which would require separate agreement and a license obtained from the Highway Authority in order to facilitate this.

Site set up for temporary site buildings required for the demolition works including compound and plant storage areas:

The site compound is identified within section 3.4 of the Health and Safety Plan. It is understood based on the site access routing that vehicles are to drive in and drive out of the site with no turning required. This should however be confirmed. It should also be confirmed that there is sufficient space to hold vehicles in this area without overhanging the highway which would be unacceptable.

Should this not be the case the applicant should demonstrate that there is sufficient space on site to accommodate the largest vehicle turning on site as the demolition phases progress.

The site layout plan included within page 10 of the Health and Safety Plan outlines that the site boundary/compound relies on land which falls under the jurisdiction of the Highway Authority. An appropriate license will therefore be required for the site compound to be placed on the highway. Further information on the appropriate license to be applied for can be found at the following link:

<https://www.hants.gov.uk/transport/licencesandpermits>

It is also noted that the site boundary encompasses parking spaces to the west of the car park encroaching on allocated spaces for 'South Park Court'. No commentary has been provided on the management of these spaces and where these vehicles are to be relocated to throughout the demolition works being undertaken. The planning authority in their capacity as the Local Parking Authority should confirm the acceptability of the removal of these parking spaces during the demolition period and whether suitable alternative parking provision is provided.

Details of the methodology for ensuring dirt is not transferred onto the Highway:

Section 3.3 of the Demolition Method Statement outlines the fact that wheels are to be inspected for dirt and debris before leaving the site. This is welcomed.

Additionally, Section 10.5 of the Health and Safety Plan identifies provision of water supply to washdown wheels. The provision of wheel wash facilities should be identified on the site layout drawing and located as close to the site egress as possible.

Additionally, section 10.6 of the Health and Safety Plan refers to arranging of road sweepers should mud be spread on the highway. This is noted.

For both the wheel wash facilities and road sweeper these should be available for the full demolition period and a commitment should be provided within the submitted documentation to state as such.

Reference to a pre-commencement survey:

The applicant outlines an inspection of Bulbeck Road with provision of photographic records of the current condition before demolition works commence. The applicant commits to rectifying any damage occurred on the highway should this be considered to have occurred following demolition works. This is noted.

Having regard to the above, the Highway Authority require the further information requested before a formal recommendation can be made on this prior approval application. As requested these matters should be encompassed within one comprehensive document for ease.

Final consultation response following submission of revised further information

Thank you for your reconsultation on the above planning application. In response to previous comments dated 01 July and following a series of direct discussions to resolve outstanding matters, the applicant has submitted a revised 'Health and Safety Plan RevP05 dated 24 July 2024. This documentation encompasses all highway matters relating to the demolition activities which the Highway Authority have reviewed and have the following comments to make.

Provision of long-term facilities for contractor/operative parking:

The applicant has confirmed within page 18 of the Health and Safety Plan the car park to be utilised by contractors whilst demolition activities take place. Additionally, a commitment has been provided to state that under no circumstances should parking occur on the public highway with the designated car park the only contractor parking available. These measures are considered acceptable to the Highway Authority. The Planning Authority in their capacity as the Local Parking Authority should also confirm whether use of this car park for contractors is acceptable. The Highway Authority should be reconsulted for further comments should this proposed car park be a concern.

Number of associated vehicle movements (both for demolition works and contractors):

The applicant confirms that the maximum number of vehicle movements within peak periods of demolition activities is to be 5 per day. This is noted.

Swept path analysis has been provided for the largest vehicle expected to access the site which has been confirmed to be a low loader. The Highway Authority note that due to the site constraints, the low loader relies on the full carriageway width when undertaking the necessary movements to access the site. The Highway Authority understand that this vehicle size is necessary for demolition activities and a smaller vehicle cannot be utilised.

A temporary TRO will therefore be required to temporarily suspend any parking which can occur along Bulbeck Road during the period of demolition works. The ability of the low loader to access the site is reliant on the parking restriction being in place for the movements to be undertaken appropriately.

Arrangements and schedule for vehicle movements associated with all demolition works:

The applicant has confirmed within section 10.9 of the Health and Safety Plan that deliveries and collections will be scheduled to ensure that due to site constraints no more than 1 vehicle will be attending the site at one time. This is considered acceptable to the Highway Authority.

Additionally, section 1.4 of the Health and Safety Plan outlines that deliveries are not to be undertaken within the weekday AM and PM peak periods (08:00-09:00; 17:00-18:00) and the Saturday peak period (12:00-13:00). This is noted.

Proposed routing of vehicles associated with demolition works:

Page 21 of the Health and Safety Plan outlines the proposed routing to and from the site for demolition activities. The Highway Authority are satisfied with the proposed routing shown for vehicles.

Protection of Pedestrian routes during demolition:

The Highway Authority previously requested that consideration was given towards provision of a segregated route within the carriageway to overcome the proposed footway closures to facilitate the demolition works as identified on page 11 of the Health and Safety Plan.

Following direct discussions with the applicant it is understood that this cannot be facilitated as the required vehicles for the demolition activities would not be able to access the site due to the constraints of Bulbeck Road. Considering the above, a footway diversion strategy will therefore be required. This diversion strategy will be agreed through a temporary TRO arrangement along with the temporary parking suspension as laid out above. Further information on the temporary TRO process can be found at the following link: [Traffic management | Hampshire County Council\(hants.gov.uk\)](https://www.hants.gov.uk/traffic-management)

The applicant is reminded that the temporary TRO and traffic management procedures and the licenses required to facilitate the demolition activities are a separate statutory process and the relevant parties will need to be satisfied with the measures upon applying for the licenses.

Site set up for temporary site buildings required for the demolition works including compound and plant storage areas:

It is understood that vehicles are to be driven into and out of the site however where any reversing is required this is to be accompanied by a banksman as confirmed within item 10.7 and 10.10 of the Health and Safety Plan. The applicant has also confirmed that arrangements will be made to ensure vehicles do not overhang the highway. This is noted.

Confirmation has been provided on page 10 (section 3.4) to confirm that relevant liaison and agreement has been sought in regard to the site boundary encompassing parking spaces for 'South Park Court'. It is understood that separate agreement has been undertaken with the Planning Authority on this matter with parking relocated elsewhere during the demolition period. This is noted.

Details of the methodology for ensuring dirt is not transferred onto the Highway:

A commitment has now been provided within section 10.6 of the Health and Safety Plan confirming that wheel wash facilities and the road sweeper are to be available for the full demolition period for use if required. Additionally, the proposed location of the wheel wash is shown within the site compound drawing on page 10 of the Health and Safety Plan. This is considered acceptable to the Highway Authority.

Recommendations

Having regard to the above, the Highway Authority provide no objections to this prior approval application.

Landscape Team, Havant Borough Council

No landscape objection.

Portsmouth Water Company

Initial consultation response

Due to the sensitivity of the site Portsmouth Water request that a Demolition Environmental Management Plan is submitted for comment prior to any demolition. Details of what this should include is referenced within our previous response dated 20th December 2023. Our previous response remains valid and is referenced below for ease.

Portsmouth Water Response - 20th December 2023.

The site lies on Alluvium over the Chalk Formation. The geology beneath the site is classified as a Principal Aquifer and the site lies in a Source Protection Zone One (SPZ1) for the Havant & Bedhampton Springs - an essential public water supply source. The Havant and Bedhampton springs supply water to a population of approximately 250,000 people, including the City of Portsmouth, Havant, naval dockyards and local hospitals.

The geological setting is prone to solution features which could constitute very rapid travel times between the site and the Havant and Bedhampton Springs meaning pollution from the construction and development of the site could impact the public water supply. There are also several springs in the locality of the site and one directly below the car park. The nearest spring used for public water is less than 100m from the site boundary. A map is provided below (*see consultation response on website for map*); red springs are used to public water supply, green springs discharge to the environment. The purple box denotes the location of the Bulbeck car park.

Portsmouth Water's Position

Portsmouth Water have no objections in principle to the proposed demolition, however due to the sensitivity of the groundwater environment at the site we would wish to see a Demolition Environmental Management Plan (Similar to a CEMP).

Further consultation response following submission of additional information

On review of the updated Environmental Management Plan (ref. 553-22 issue 003) we are satisfied with the detail provided in regard to groundwater protection.

We request to informed, in advance, of the start date so that we can arrange a site visit.

Property Services Manager

No comments received.

6 Community Involvement

This application was publicised in accordance with the Council's Code of Practice for Publicity of Planning Applications approved at minute 207/6/92 (as amended), as a result of which the following publicity was undertaken:

Number of neighbour notification letters sent: 126

Number of site notices: 9 (Displayed by applicant in accordance with GPDO requirements)

Statutory advertisement: Not applicable.

Number of representations received: 16

Summary of objections:

Detail of proposals

- 6.1 Inadequate level of engagement and consultation between the Council and the local community and adjacent management companies who will be affected by the loss of this amenity.
- 6.2 Existing problems of vandalism and antisocial behaviour are in part due to decline of the facility over many years due to lack of maintenance and introduction of parking charges.
- 6.3 Number of staff proposed appears small; would a larger team complete the project quicker?

Officer comment: *Consideration of this prior approval application is limited to assessing the method of demolition and proposed restoration of the site only; pre-application consultation with nearby occupiers is at the discretion of the applicants. The publicity requirements set out in the GPDO have been complied with.*

That said, the applicants have advised in their response to public comments that they have been in direct dialogue with the long leaseholder/management organisation of South Park Court, Dolphin Court and local schools regarding the proposals. They also attended a public meeting facilitated by the Havant Civic Society in March 2024 to respond to questions. The Council plan to hold a Q&A session for residents along with the contractor to talk through the method of demolition prior to commencement of any works.

Parking

- 6.4 Concern regarding loss of parking facilities for residents of South Park Court whilst the demolition process is taking place - what alternative provision being made for residents and businesses?

- 6.5 Loss of parking facility for residents of, and visitors to Havant, including disabled users - this includes tradespeople and care workers who are unable to park on street due to parking restrictions in the town centre.
- 6.6 Loss of parking will result in further economic decline of the town centre due to decreased footfall.
- 6.7 Loss of parking is likely to lead to further pressure for parking on streets in and around the town centre, leading to a loss of amenity for residents in those streets.
- 6.8 Depreciation of house values and saleability due to fewer parking options being available.

Officer comment: *The GPDO grants a general permission for the demolition of buildings, with only the method of demolition and any proposed restoration of the site reserved for further consideration via the 'prior approval' process. The loss of the car parking facility of itself is not a matter falling under consideration in this prior approval application.*

However, the applicants have advised in their response to public comments that there are five other HBC owned car parks within the town centre that are not used to capacity and have designated disabled parking bays, as well as 51 on-street parking spaces on Market Parade, North Street and South Street that can also be used by Blue Badge holders free of charge. The applicants have undertaken to monitor use of the existing disabled parking bays within the Meridian Centre and will look to increase the number if necessary.

Access

- 6.9 Will access still be available to Bulbeck Road or will it be closed off?
- 6.10 Has traffic modelling been undertaken of the redistributed trips within the town centre following demolition of the car park?
- 6.11 Loss of the 'Park and Stride' facility for local schools.

Officer comment: *It is not the intention for Bulbeck Road to be closed during the demolition and there is no plan to permanently remove the road. Temporary TROs will be required to divert pedestrians and suspend parking within Bulbeck Road during the demolition activities; however this is a separate legislative requirement and the applicant will be advised to pursue these matters by way of informative.*

No traffic modelling has been undertaken considering the low current usage of the Bulbeck Road site; nor has the Highways Authority required such information in responding to the application.

Amenity

- 6.12 What has been put in place to limit dust and debris?
- 6.13 What has been put in place to limit noise pollution?
- 6.14 How long will demolition activities take place?

- 6.15 Where will the hoarding be sited?
- 6.16 What will happen to the site once demolition is complete; how long will it remain vacant with risks of anti social behaviour?
- 6.17 Demolition will give rise to safety issues for the Council to address.

Officer comment: . The demolition of the car park structure is expected to take around eight weeks, there will then be a period of ground investigation prior to the concrete sub-structure being demolished. The length of the second phase will be determined by what is found.

The application is supported by a suite of documents including a detailed Health and Safety Plan, Environmental Management Plan, Risk Assessment Register and Demolition Method Statement which have been reviewed by relevant consultees including the Environmental Health team, the Environment Agency and Portsmouth Water. Mitigations to address the risk of dust, debris, noise and disturbance are set out in these documents and all consultees have confirmed that they have no objections to the proposals.

With regards the risk of anti social behaviour, following demolition it is intended that a solid timber hoarding will be erected around the perimeter of the site with a set of double gates, providing a secure barrier until the site is developed. At this time it is not possible to confirm how long it will be before that redevelopment takes place.

Future development

- 6.18 What are the plans for future development of the site?
- 6.19 Will the new building have parking provision for parties who have lost out through losing the Bulbeck Road car park?

Officer comment: The Council's Havant Town Centre webpages set out the following in respect of the site:

"The Redevelopment of Bulbeck Road is phase one of this largescale regeneration plan for Havant town centre. £1.65 million of grant funding was secured from the Department for Levelling Up & Communities (DHLUC) from the Brownfield Land Release Fund 2 (BLRF2) in November 2022. The funding will allow the council to initiate plans to redevelop the Bulbeck Road car park site. The underused car park will be demolished, and the site prepared for subsequent development for residential use. The project will address the aspirations of the council by bringing forward more housing whilst also kickstarting regeneration of the town centre. The final form of the housing provided is yet to be determined, but indicative modelling has proved the site capable of providing 91 high quality town centre homes."

Whilst not within the scope of this prior approval application, the applicants have advised that the parking facilities at Bulbeck Road are independent of any contract or rights pertaining to nearby properties, and the Council has no obligation to retain the car park for nearby residents.

7 Planning Considerations

7.1 Having regard to the relevant policies of the development plan it is considered that the main issues arising from this application are:

- (i) Principle of development
- (ii) Method of demolition
- (iii) Any proposed restoration of the site

(i) Principle of development

7.2 The application site is a current multi-storey car parking facility in a town centre location which is proposed to be redeveloped in due course as part of plans for the regeneration of Havant Town Centre, which is an overarching objective of Policy CS6 of the Core Strategy and is provided for in more detail in the Havant Borough Regeneration and Economy Strategy 2022-2036. In the latter document the redevelopment of Bulbeck Road comprises one of the deliverables of the 'Sustainable Places' theme. The Council's Havant Town Centre webpages set out the following in respect of the site:

The Redevelopment of Bulbeck Road is phase one of this largescale regeneration plan for Havant town centre. £1.65 million of grant funding was secured from the Department for Levelling Up & Communities (DHLUC) from the Brownfield Land Release Fund 2 (BLRF2) in November 2022. The funding will allow the council to initiate plans to redevelop the Bulbeck Road car park site. The underused car park will be demolished, and the site prepared for subsequent development for residential use. The project will address the aspirations of the council by bringing forward more housing whilst also kickstarting regeneration of the town centre. The final form of the housing provided is yet to be determined, but indicative modelling has proved the site capable of providing 91 high quality town centre homes.

7.3 The GPDO grants a general permission for the demolition of buildings, with only the method of demolition and any proposed restoration of the site reserved for further consideration via the 'prior approval' process. The loss of the car parking facility of itself, which is the subject of a number of representations regarding the proposal, is not a matter falling under consideration in this prior approval application.

7.4 Following the commissioning of a Preliminary Ecological Appraisal and Roost Assessment, followed by Bat Emergence and Re-Entry Surveys in June 2024, it has been established that there are no protected species residing within the site which might act as an impediment to the demolition activities.

7.5 On 27th February 2024, following initial consideration of representations and consultation responses received, it was confirmed that Prior Approval was required in respect of the method of demolition and any proposed restoration of the site. This report therefore goes on to assess the application proposals in this respect.

(ii) Method of demolition

7.6 The demolition of the car park and removal of its slab and foundations have implications for a range of planning considerations which are relevant to this case - heritage assets (scope for archaeological remains); groundwater contamination; residential amenity; and impacts on the highway network.

Heritage assets (scope for archaeological remains)

- 7.7 The County Archaeologist has advised that whilst the development of the multi-storey car park is likely to have already created some negative impacts on archaeological remains within the site, this is unlikely to have completely removed the archaeological potential, with archaeological remains often surviving in between foundation piers or rafts. There is also a potential for remains to be present at deeper levels (such as the deeper strata of archaeology or lower portions of truncated pits, wells etc). Given the location of the site, there is a high potential that important archaeological remains relating to the development of Havant may be present, including evidence of the Roman settlement as well as early medieval and medieval development of the town, and such remains are likely to lie within relatively deep (and therefore previously undisturbed) strata of archaeological deposits.
- 7.8 Given this historic context the demolition of below ground elements of the car park has a high risk of exposing and destroying archaeological remains. In order to appropriately address this potential, the applicants have submitted a Written Scheme of Investigation (WSI) for archaeological monitoring which incorporates provisions for the monitoring of excavations for the presence of archaeological features, deposits and artefacts. In the event that significant or complex remains are encountered this would be reported to the Senior Archaeologist at Hampshire County Council for further investigation, including the cessation of groundwork if necessary. Recording, processing and reporting of the findings is also incorporated within the WSI.
- 7.9 The County Archaeologist has endorsed the document and believes that it represents appropriate archaeological mitigation, and on this basis it is considered that appropriate provision has been made for heritage assets, in accordance with the objectives of Policy CS11 of the Core Strategy and DM20 of the Allocations Plan.

Groundwater contamination

- 7.10 As set out in the consultation response from Portsmouth water, the site lies on Alluvium over the Chalk Formation. The geology beneath the site is classified as a Principal Aquifer and the site lies in a Source Protection Zone One (SPZ1) for the Havant & Bedhampton Springs - an essential public water supply source. The geological setting is therefore vulnerable to any pollution from the construction and development of the site impacting the public water supply.
- 7.11 Following the initial consultation responses of both Portsmouth Water and the Environmental Control Officer, a range of updated documents have been submitted comprising a Demolition Method Statement, Environmental Management Plan, Health & Safety Plan, and Risk Assessment Register, which together set out a suite of precautionary measures to protect the water environment. This would entail maintaining a watching brief and regular inspections of surface water and potential runoff on site; implementation of the Environment Agency's Pollution Prevention Guidelines; siting wheel wash equipment away from water courses and installing filters on drains; bunding of storage areas; and provision of spill kits to deal with any incidents.

7.12 With these measures in place, the Environmental Control Officer has advised that the risks associated with removing the slab can be regarded to be acceptable; and both Portsmouth Water and the Environment Agency have confirmed they have no objections and are satisfied with the level of detail provided as regards groundwater protection.

7.13 The proposals are therefore considered to be in accordance with the objectives of Policy DM10 of the Core Strategy and Policy DM17 of the Allocations Plan.

Residential amenity

7.14 As set out in Section 1 (Site Description), the application site lies within close proximity of a range of residential properties within Park Road South, Bulbeck Road, Homewell and West Street, and the process of demolishing the substantial car park structure and its slab and foundations has the potential to adversely affect the amenity of these properties by reason of dust, noise and general disturbance.

7.15 The submitted Environmental Management Plan sets out a range of mitigation measures which are proposed in order to limit the risk of noise and vibration disturbance:

- Communication with neighbours to advise when noisy works are intended to be carried out
- Monitoring of on-site noise levels
- Fitting of silencers to pneumatic tools
- Deliveries would be programmed to arrive during daytime hours only, with care taken when unloading and prohibitions on waiting with engines running
- Proper maintenance of all items of plant
- Sequencing the demolition process to retain part of the external elevation of the building to act as a visual and acoustic screen whilst the internal bays are undergoing removal

7.16 With regard to dust suppression the submitted Method Statement and Environmental management Plan again set out a range of control measures:

- When removing ground floor slabs and foundations, structures will be lifted by bucket attachment whenever possible, in-lieu of using impact breakers.
- Fire hoses will be used to spray water onto the work face and suppress dust.
- Using proprietary dust suppression equipment, and having dust monitors situated on the site boundary to get a live reading to the Site Manager, which will be monitored and followed throughout the duration of the project
- Sheeting of vehicles transporting materials to and from the site
- Limiting the speed of site vehicles to 10mph
- Leaving suitable hardstandings in place until the end of the project to mitigate dust release during vehicle movements
- Provision of wheel washing facilities and/or regular use of road sweepers at access points and on local roads

Damping down of haul roads

7.17 Following receipt of this information, no objections have been received from the Environmental Health Officer and consequently it can be concluded that the proposed measures to mitigate the impacts on residential amenity meet the requirements of Policies DM10 and CS16 of the Core Strategy.

Impacts on the highway network

7.18 The application site lies within a town centre setting adjacent to the Park Road South transport corridor, which is a sensitive location whereby any inappropriate levels of traffic control associated with the development are likely to give rise to adverse impacts on the highway network, both for vehicle users and pedestrians/cyclists in the vicinity. It is also noted that the erection of scaffolding to facilitate the demolition works will entail the erection of hoarding across part of the adjacent South Park Court development, removing a total of 10 parking spaces from use during the demolition operations. Whilst the latter arrangement is strictly a private matter between the applicant and the adjacent landowner to agree, nevertheless the temporary loss of this car parking will add to pressure on other parking sources for residents of the South Park Court development.

7.19 In light of these considerations, the initial consultation response from the Highways Authority highlighted the need for further consideration of a range of factors:

- A programme of and phasing of the demolition works
- Provision of long-term facilities for contractor/operative parking
- Number of associated vehicle movements (both for demolition works and contractors)
- Arrangements for vehicle movements associated with all demolition works
- Proposed routing of vehicles associated with demolition works
- Protection of pedestrian routes during demolition
- Site set up for temporary site buildings required for the demolition works
- Details of the methodology for ensuring that dirt is not transferred onto the highway from the site i.e. wheel washers and mechanical road sweepers
- The need for a pre-commencement survey and confirmation that any damages to the highway occurred from the demolition works and associated vehicle movements will be rectified at the expense of the applicant

7.20 Revised information supplied by the applicant and captured in the final submitted Health and Safety Plan addresses all these points through a detailed *Traffic Management* section covering arrangements for vehicular access and egress; deliveries; control of site speeds; vehicle cleaning and road cleaning; reversing alarms; use of dedicated vehicles; vehicle quantities; site traffic rules; and a site traffic management plan. The Highways Authority have confirmed that all highway matters relating to the demolition activities have been addressed and raise no objection to the prior approval application. Whilst a temporary TRO is required to divert pedestrians and suspend parking within Bulbeck Road during the demolition activities, this is a separate legislative requirement and the applicant will be advised to pursue these matters by way of informative. On this basis it is considered that the requirements of Policy CS20 of the Core Strategy have been secured.

(iii) Any proposed restoration of the site

7.21 With regards the intended restoration of the site, the Havant Borough Regeneration and Economy Strategy 2022-2036 sets out the intention for this phase of the site's redevelopment as set out in Paragraph 7.2 above. Essentially the intention is to secure the demolition of the car park structure, its slab and foundations to then be able to release the site to the market for residential redevelopment options. In doing so the level of uncertainty associated with the demolition process will be removed from having to be considered in future investment decisions, which should stimulate market interest in the site.

- 7.22 Whilst awaiting future development proposals for the site it will have been cleared of all arisings from the demolition process and will have a solid timber hoarding erected around the perimeter with a set of double gates, providing a secure barrier until the site is developed. Holes in the hoarding will be provided to allow the public a view of the site when it is being developed. The submitted Demolition Method Statement also commits the site owner to ongoing dampening down of the site to control any dust generation.
- 7.23 These measures are considered to be consistent with the Havant Borough Regeneration and Economy Strategy 2022-2036 and will serve to screen the cleared site from having an adverse impact on the locality. They are considered consistent with the objectives of Policies CS11, CS16 and DM10 of the Core Strategy.

8 Conclusion

- 8.1 The GPDO grants a general permission for the demolition of buildings, with only the method of demolition and any proposed restoration of the site reserved for further consideration via the 'prior approval' process. The loss of the car parking facility of itself is not a matter falling under consideration in this prior approval application.
- 8.2 It has been established that there are no protected species residing within the site which might act as an impediment to the demolition activities. The proposed restoration of the site - its short term hoarding off pending the marketing of the site for residential redevelopment - is consistent with the Havant Borough Regeneration and Economy Strategy 2022-2036 intentions for the site.
- 8.3 However, given the scale and location of the demolition works and the need to protect heritage assets, groundwater in the Source Protection Zone, residential amenity and address impacts on the highway network, additional information was required to be secured through the Prior Approval process.
- 8.4 Following the submission of additional information and re-consultation with key consultees, it is considered that the proposals now incorporate appropriate levels of control and mitigation, and it is considered that Prior Approval can be granted. The works will need to be carried out in accordance with the approved details.

9 RECOMMENDATION:

That the Head of Place be authorised to **GRANT PRIOR APPROVAL** for application APP/24/00053 subject to the following conditions:

- 1 The development must be carried out within a period of 5 years from the date on which this approval is given.

Reason: To comply with Part 11 paragraph B.2 (ix) (aa) of the Town and Country Planning (General Permitted Development) (England) Order 2015 as amended.

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans and other details:

Hughes & Salvidge Health and Safety Plan 553-22 Issue 005
Hughes & Salvidge Environmental Management Plan 553-22 Issue 004
Hughes & Salvidge Risk Assessment Register dated 08/07/2024
Hughes & Salvidge Method Statement MS553-22 Issue 001
Arbtech Preliminary Ecological Appraisal and Roost Assessment dated 18th March 2024
Arbtech Bat Emergence and Re-Entry Surveys dated 5th June 2024
Pre-Construct Archaeology Ltd (Winchester) - Bulbeck Road Car Park,
Havant: Written Scheme of Investigation for Archaeological Monitoring Issue 1
Bulbeck Road Planning Portal Comments at 30/04/2024

Reason: To comply with Part 11 paragraph B.2 (viii) (aa) of the Town and Country Planning (General Permitted Development) (England) Order 2015 as amended.