



Homes and Communities Agency

**Former Colt International Site, New Lane,
Havant**

Supporting Statement

**Application for the Prior Notification of Proposed
Demolition**

September 2017

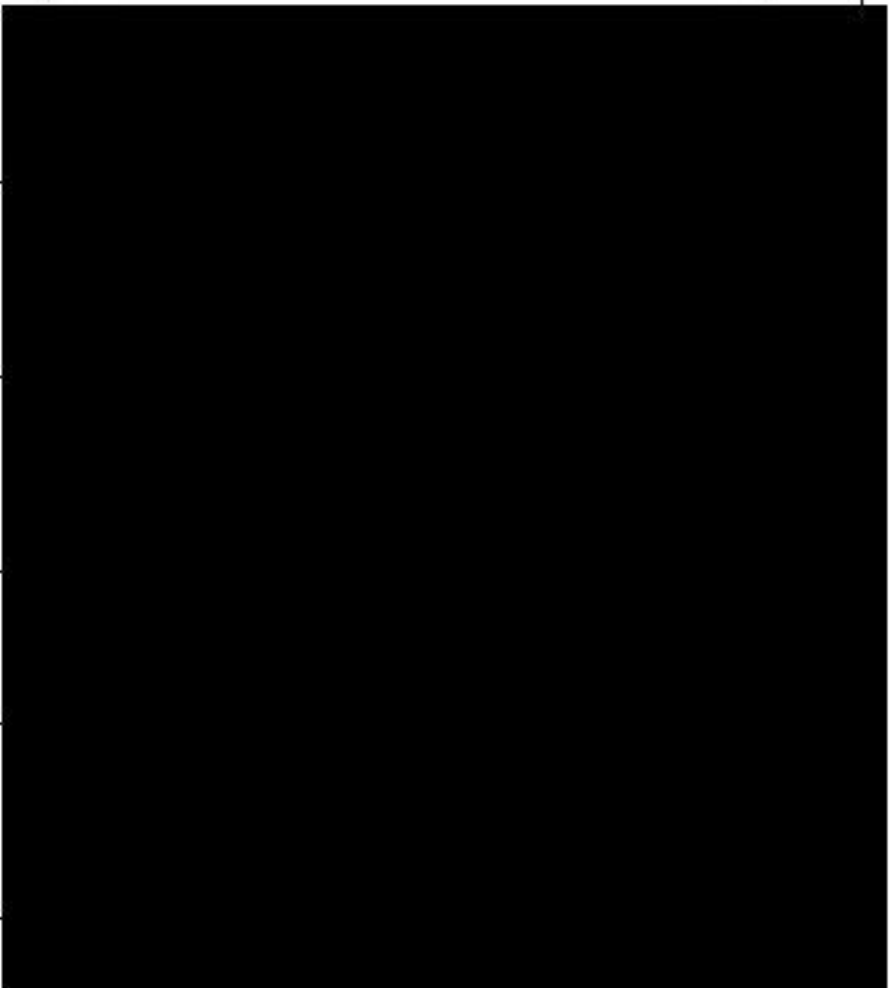




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Checked by:	Jeremy Gardiner	Signed:	
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1.0 Introduction

- 1.1 This Planning Statement has been prepared in support of an application for the Prior Notification of Proposed Demolition of the former Colt International buildings at New Lane, Havant. The application is being made under Class B, Schedule 2, Part 11 of the Town and Country Planning (General Permitted Development) (England) Order 2015, ahead of an outline application for the redevelopment of the site to include a mix of residential and employment uses.
- 1.2 Colt International has now relocated its business to sites in Havant and Petersfield. The existing buildings are outdated and no longer fit for purpose; asbestos has been detected within the buildings and in their current condition, the buildings are vulnerable to vandalism and theft and are causing the Homes and Communities Agency (HCA) to incur significant security costs. As the site is vacant and is the subject of a pre-application consultation with Havant Borough Council ahead of its redevelopment, the HCA wishes to demolish the existing building in preparation.



Figure 1: Colt International, New Lane, Havant

2.0 Site and Surroundings

- 2.1 The site lies to the north of Havant town centre, to the south of Bartons Road, east of New Lane and west of Martin Road and stands in an area generally surrounded to the north and west by residential development and to the east and south by industrial and commercial development. It is within the Bondfields Ward.



Figure 2: Aerial Location Plan

- 2.2 The site is approximately 205m long (east to west) and 130m wide (north to south). There are established vehicular accesses into the site from the east (New Lane) and the west (Martin Road), with the primary access being from Martin Road into a large car park. The access from the east provides access for commercial vehicles into a delivery and servicing area on the southern boundary of the site. There is a secondary car park for visitors in the north-east



corner of the site which also utilises the eastern access. There are bus stops to the north and west of the site on Bartons Road and Martin Road respectively.

- 2.3 The existing building on the site is located closer to the eastern boundary than the west and is generally square measuring 142m east to west and 136m north to south. The building is industrial in appearance with a mix of 1960's glazing and concrete, serving what appear to be ancillary offices (of 5 storey height) in the eastern portion of the building. The eastern elevation of the building is staggered with the southernmost part projecting beyond the northernmost section and therefore, standing closer to New Lane. This is the main entrance into the building and extends to three storeys in height. The manufacturing element of the building extends away from this to the west. It is formed of brick and metal cladding under a multiple pitched roof aligned east to west. It is clear the building has been extended at various stages as a range of construction types and roof forms are evident in the western portion of the building and this part of the building is generally two storeys high. The building however, appears lower as viewed from the primary route along Bartons Road as a result of the land level change. The car park on the west part of the site is at street level with Martin Road but the site then steps down by 5-6m to the level site of the industrial buildings. There is a metal, palisade fence around the perimeter of the site and a limited amount of low level landscaping, together with more mature trees.



3.0 Planning History

- 3.1 There are a number of planning applications relating to the former Colt International building, including applications to raise the roof to accommodate testing equipment, signage and fencing. However, it is not considered that any of these applications have a material impact on the application for prior notification or on the future application for redevelopment.



4.0 The Proposal

- 4.1 The proposal the subject of this application is for the demolition of the existing buildings on the former Colt International site in Havant ahead of the site's subsequent re-development.

Compliance with statutory requirements

- 4.2 This prior notification application is being made under Class B, Part 11 of Schedule 2 of the General Permitted Development Order 2015. Set out below are details of the proposal's compliance with the relevant prior notification criteria, on the basis that the proposed demolition works fall under Class B: Any building operation consisting of the demolition of a building.

- 4.3 B.1 sets out the circumstances under which development is not permitted by Class B:

(a) the building has been rendered unsafe or otherwise uninhabitable by the action or inaction of any person having an interest in the land on which the building stands and it is practicable to secure safety or health by works of repair or works for affording temporary support;

(b) the demolition is "relevant demolition" for the purposes of section 196D of the Act (demolition of an unlisted etc. building in a conservation area) (a); or

(c) the building is a specified building and the development is undertaken during the specified period, regardless of whether, in relation to the development, a prior approval event has occurred.

- 4.4 It is not considered that any of these circumstances apply to the building the subject of this application. In respect of the relevant conditions attached to the prior notification procedure, the statements below demonstrate how the proposal meets each of these conditions:



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

(a) where demolition is urgently necessary in the interests of safety or health and the measures immediately necessary in such interests are the demolition of the building the developer must, as soon as reasonably practicable, give the local planning authority a written justification of the demolition;

4.5 The demolition is not urgently necessary, meaning that the condition does not apply.

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

(i) the developer must, before beginning the development—

(aa) in all cases, 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;

4.6 The applicant is complying with this requirement. The applicant, prior to beginning the development, is applying to the Local Planning Authority for a determination as to whether prior approval of the authority will be required as to the method of demolition and any proposed restoration of the site.

(ii) an application described in paragraph (b)(i)(aa) must be accompanied by a written description of the proposed development, a statement that a notice has been posted in accordance with paragraph (b)(iv) and any fee required to be paid;

4.7 The relevant fee has been paid. A notice advertising this application will be posted at the site following the application's registration, with the following description:



**Application for Prior Notification of Proposed Demolition
(Schedule 2, Part 11 of The Town and Country Planning (General
Permitted Development) (England) Order 2015) of the former Colt
International buildings at New Lane, Havant.**

(iii) a request described in paragraph (b)(i)(bb) must include the address of the building, the developer's contact address and, if the developer is content to receive communications electronically, the developer's email address;

- 4.8 Whilst the applicants contact details are provided together with the address details of the building, this is not strictly necessary as paragraph (b)(i)(bb) relates specifically to buildings that are community assets or in Class A4 use.

(iv) subject to paragraph (b)(v), the applicant must display a site notice on or near the land on which the building to be demolished is sited and must leave the notice in place for not less than 21 days in the period of 28 days beginning with the date on which the application was submitted to the local planning authority;

- 4.9 A site notice is posted on the site (11th September 2017).

(vii) subject to paragraph (b)(x), 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;

4.10 The development will not begin before the occurrence of one of the above.

(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;

(ix) subject to paragraph (b)(x), the development must be carried out—

(aa) where approval has been given by the local planning authority, within a period of 5 years from the date on which approval was given;

(bb) in any other case, within a period of 5 years from the date on which the local planning authority were given the information referred to in paragraph (b)(ii);

General Description of Proposed Methodology

4.11 The work the subject of this application relates directly to the demolition and removal of the existing buildings identified on the site location plan. The proposed demolition works have already been notified in accordance with Section 80 of the building act.

4.12 This is an application to the Local Planning Authority for a determination as to whether prior approval will be required as to the method of demolition and any proposed restoration of the site. Consequently, this statement does not set out the full details of the proposed works at this stage, but does provide general information to assist the Council in its determination.



- 4.13 Construction timescales have not yet been confirmed, but the demolition work is scheduled to commence on the 30th October 2017, subject to the relevant permissions. Working hours will be between 0800 and 1800 Monday to Friday.
- 4.14 The site presently contains vacant buildings, which will be demolished and excess crushed material will be kept on site following the works and used to level the site. Access to and egress from the site will be via New Lane.
- 4.15 The contractor may conduct structural surveys of the building to be demolished in order to carry out the demolition safely. Structural surveys are contractor specific; the building in the south east of the site will require a detailed methodology to determine how the upper reaches will be demolished. This detail will depend on the contractor and their preferred method based upon the reach of their largest machines. Buildings which can be reached by the arm of an excavator are less likely to require a structural survey. Demolition will not be undertaken using balling techniques or other methods that will impose excessive vibration, release significant quantities of dust or create high levels of noise. Framed members are to be supported prior to isolation and removed in a controlled manner.
- 4.16 A structural condition survey of the retaining wall to the north of the site will be conducted to establish a starting condition, to which any damage suspected to be caused by the contractor can be compared.
- 4.17 Asbestos containing materials have been identified by the refurbishment and demolition survey, carried out by Equin Environmental. With regards to method, this will again be contractor specified. However, the buildings will be soft stripped in full prior to demolition of the building structure, including asbestos removal in accordance with HSE requirements and the Control of Asbestos Regulations 2012.
- 4.18 The asbestos removal contractor is required to be licenced by the Health and Safety Executive (HSE) for asbestos removal works (for licenced work). The employer will provide an



independent asbestos air monitoring consultant to ensure the works are conducted appropriately. In addition, where appropriate, the independent monitoring consultant will conduct 4 stage clearance and reoccupation certificates of enclosures. The contractor is to supply evidence that the asbestos containing materials have been disposed of to an appropriately licensed landfill.

- 4.19 The contractor is required to produce a Demolition Environmental Management Plan (DEMP). This will be a live document in which works, mitigation measures and monitoring for noise and dust will be set out. It has been specified that dust monitoring shall include dust deposition gauges and reassurance asbestos in air monitoring on the boundary of the site which should include background monitoring before the works commence.
- 4.20 Utility disconnections from the buildings and the site have been conducted, and statutory utility providers have been contacted via the Section 80 Demolition notification.
- 4.21 Demolition works during the night are not permitted and therefore external temporary lighting is not required. Internal temporary lighting may be utilised if required to ensure works can progress safely.
- 4.22 Parking during demolition is due to be within the site boundary. Parking/ waiting on public roads is not permitted.
- 4.23 The contractor is to provide a Waste Management Plan.



Other considerations

- 4.24 A number of environmental investigations and surveys have been carried out ahead of this proposal, to understand and inform the site conditions. These studies are being submitted as part of this application to show the environmental issues affecting this site and the measures proposed to ensure these are satisfactorily addressed. A summary of the findings and recommendations for each is set out below:

Preliminary Ecological Appraisal February 2017

- 4.25 This comprises an extended Phase 1 habitat assessment to classify habitats and identify evidence or potential for protected and notable species or habitats.
- 4.26 The appraisal makes three recommendations or further survey:
1. Supervised hand excavation of the confirmed fox den on the grass bank towards the west of the site.
 2. One dusk emergence and one dawn return survey of Building 2.
 3. Pre-commencement survey for nesting birds if the beginning of works coincides with the breeding bird season which runs from March - September inclusive.
- 4.27 The fox den to the west of the site has previously been surveyed and will be fenced off and protected during the demolition works, avoiding the need for hand excavation. Since this recommendation was made, a bat emergence survey has been undertaken (24 May and 15 June 2017) which concluded that no bats were observed emerging from building 2. The demolition is not due to coincide with the breeding bird season.
- 4.28 In addition, the following site specific recommendation (relevant to the demolition process) was made:



1. Where possible, all trees bordering the site and T1 and T2 should be retained and protected with an appropriate buffer. If it is not possible to retain T1 and T2, these trees should be removed using soft-felling techniques.

4.29 The Tree Constraints Plan dated January 2017 identifies the category of each tree on the site. There are no Category A trees, with the majority falling into Category B and several Category C. Category B trees are of moderate quality with an estimated life expectancy of at least 20 years. Only one tree is to be removed as part of the demolition works. Root protection areas for all trees to be retained are shown on the constraints plan. Protective measures in accordance with the appropriate specification contained in British Standard 5837:2012 - Trees in relation to design, demolition and construction, will be implemented.

Archaeological Desk-Based Assessment June 2017

- 4.30 The assessment confirms that no known heritage assets have been recorded within the development site. However, there is medium potential for previously unrecorded archaeological remains to be preserved where the ground level has not been truncated.
- 4.31 Section 10 concludes that archaeological monitoring should be undertaken during intrusive works to investigate the layout of underground services in the western car park, on the western perimeter of the proposed development area. The results of this investigation will further assist in determining the extent and character of potential archaeological features in relation to potential made ground and potential reduction of former ground levels. It is considered likely that further archaeological mitigation will be required post-consent in this area; further mitigation could range from preserving archaeological remains in situ, targeted open area excavation, strip map and record and potentially, archaeological monitoring during construction groundworks; a range of mitigation options may be required across the application site. To the east of the western car park, much of the remainder of the site has been significantly re-profiled in order to provide a level area for the Colt factory. It is highly unlikely that archaeological remains have been preserved in this area of the site. Less re-



profiling is apparent at the eastern perimeter of the site though it remains unlikely that an archaeological monitoring condition will be attached to works in this area.

- 4.32 No demolition is taking place in the western car park, although the hardstanding of the existing carpark will be removed. These works will not penetrate deeper than the sub-base and therefore, are unlikely to disturb anything of archaeological significance.

Ground Investigation and Assessment June 2017

4.33

The assessment comprises a review of desk study information and a phase 2 ground investigation, which identifies the following risk levels:

1. Future site users – **HIGH** These risks could be managed by further assessment and investigation and development measures that minimise potential exposure to contaminants in the sub-soil.
2. Construction workers (during redevelopment of site) – **HIGH** - though risks can be mitigated through appropriate working practices.
3. Groundwater– **LOW to MODERATE**
4. Surface Water – **LOW**
5. Onsite property/buildings and services – **LOW TO MODERATE**
6. Offsite workers and residents – **LOW** (noting that in order to keep risks as low during any redevelopment works measures may need to be employed to minimise wind-blown dust).

- 4.34 During the pre-application meeting, Havant Borough Council identified that the site lies within an identified Groundwater Source Protection Zone. SPZs are used to define areas close to drinking water sources where the risk associated with groundwater contamination is greatest.

- 4.35 New Lane falls within Zone 1c (inner zone – subsurface activity only) which extends the zone 1 (defined as the 50-day travel time from any point below the water table to the source, with



a minimum radius of 50 metres) where the aquifer is confined (i.e. below overlying impermeable geological layers) and may be impacted by deep drilling activities. The Environment Agency's approach to groundwater protection (March 2017) sets out the EA's approach to managing and protecting groundwater.

- 4.36 Section A covers the overarching groundwater protection principles and approaches. Table 1 provides a summary of the position statements that apply to developments and activities in SPZ1. Demolition is not listed as an activity, although Section N does provide guidance on development affecting groundwater. Of relevance to this proposal is N8 which states that,
- Within SPZ1, the Environment Agency will normally object in principle to any planning application for a development that may physically disturb an aquifer."*
- 4.37 Also of relevance is N7, which sets out the requirement for a hydrogeological risk assessment, where developers are proposing schemes that present a hazard to groundwater resources, quality or abstractions.
- 4.38 Section 10.3 of the Ground Investigation and Assessment (June 2017) sets out the findings with regard to groundwater. Overall, it is considered that the risk to underlying groundwater can be downgraded (from moderate risks identified in the Phase 1 investigation) to low to moderate. Section 11 of the assessment sets out recommendations, including a recommendation for an additional deeper exploratory hole to circa 10m to better understand the potential thickness of the London Clay and therefore its effectiveness as a barrier to potential downwards migration of contamination towards the deeper chalk. This will also assist in foundation design and provide geotechnical parameters. The report notes that further investigations can be carried out either before or after demolition, the advantage of a post demolition survey being that it allows for a more comprehensive investigation of the site.
- 4.39 Having regard to the requirements of N7 and N8 and the findings of the investigation and assessment report, the main risk to groundwater contamination would come from deep piling. As no deep piling is required during the demolition of the Colt buildings, it is not recommended



that any further investigations are carried out prior to demolition. However, the recommendation for further investigation is noted and the need for these will be re-considered post demolition. Depending on the outcome of these investigations, the requirement for a hydrological risk assessment, in accordance with N7, will also be assessed.

Flood Risk Assessment and Drainage Strategy July 2017

- 4.40 The site lies within Flood Zone 1, where the proposed development is appropriate in accordance with the National Planning Policy Framework and Planning Policy Guidance. A Flood Risk and Drainage Strategy for the site was produced in July 2017, which demonstrates that the site will not increase the risk of flooding elsewhere.

Public Consultation

- 4.41 In March 2017, following their relocation within Hampshire, Colt International issued a Press Release which explained the company's rationale for its move and its decision to remain within Hampshire. It clarifies the established working relationship that existed between Colt International and the HCA in the lead up to the site's disposal and the opportunities that could be realised through the site's redevelopment.



5.0 Conclusion

- 5.1 This Prior Notification application is being made under Class B, Part 11 of Schedule 2 of the General Permitted Development Order 2015. This statement is being submitted in support of the application, to determine whether prior notification is required and if it is, whether it is approved.
- 5.2 The information above demonstrates how the applicant has met, or will meet, the conditions set out in the GPDO and provides general information on the methods and procedures which will be followed during the demolition of the building.