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COMMERCIAL PROPERTY ADVICE



SEQUENTIAL TEST: LAND AT ELETTRA AVENUE, WATERLOOVILLE

Outline Planning Application with All Matters Reserved Apart from Access For Development within Class E (Light Industrial, Retail, Café and Restaurants, Leisure / Gym), B2, B8 and B8 Trade Counters

On Behalf Of:

Hargreaves Properties Limited

Prepared By:

(Hons) MRTPI

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Job Ref: P1571

Date: 18th September 2024

SEQUENTIAL TEST: LAND AT ELETTRA AVENUE, WATERLOOVILLE

**Proposed Mixed Use Employment, Leisure and Retail Development at
Land at Elettra Avenue, Waterlooville, Hampshire**

Main Contributors
Fred Davies MA Planning MRTPI

Issued By

Signature:



Print Name: Fred Davies

Date: 18th September 2024

Approved By

Signature:



Print Name: John Pearce

Date: 18th September 2024

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1.0 INTRODUCTION

- 1.1 This revised Sequential Test Report (**'STR'**) has been prepared by Harris Lamb Planning Consultancy (**'HLPC'**) on behalf of Hargreaves Properties Limited (**'The Applicant'**) in respect of the Applicant's proposed Mixed-Use Employment, Leisure and Retail Development (**'The Scheme'**) on land at the Elettra Avenue, Waterlooville, Hampshire (**'The Application Site'**).
- 1.2 The Application Scheme comprises the following uses:
- E – Retail (Food and non-Food), café, restaurant, light industrial and leisure)
 - B2 – General Industrial
 - B8 - Storage or Distribution and Trade Counter
- 1.3 It is acknowledged that the Class E fall under the NPPF definition of 'Main Town Centre Uses'. However, previous correspondence with Jade Ellis from Havant Borough Council (HBC; 31st July 2018), it was agreed that while a sequential assessment **would not be needed** to support the planning application, one would be provided to assess the likely impact on the town centre and its vitality and viability. Accordingly, we have updated the sequential test to confirm whether any suitable alternative sites are available to accommodate the proposed development.
- 1.4 The Retail and Leisure Statement ("RLS"), produced by MWA Planning explains that the nature of the scheme is such that the only existing centre that needs to be assessed in terms of retail impact and the Sequential Test is Waterlooville Town Centre.
- 1.5 The site is allocated for potential economic development, hotel and leisure uses under Policy WA2 (BD54) of the Havant Borough Local Plan (Allocations), July 2014 ('HBLP').
- 1.6 Outline planning permission for mixed commercial uses (Ref: APP/18/01072), for exactly the same site was granted in October 2021.

- 1.7 Paragraph 90 of the National Planning Policy Framework (NPPF) advises that for Main Town Centre Uses outside of existing defined centres which accord with an up-to-date development plan, no impact assessment is required. This point is explored further in the Supporting Planning Statement (SPS) also prepared by HLPC. As HBC has accepted that the uses accorded with Policy WA2 (BD54) of the HBLP, it is reasonable to assume that the policy position has not materially changed following the publication of the NPPF in December 2023.
- 1.8 We attach at Appendix 1 an illustrative layout which accompanies the outline planning application submitted by the Applicant. As the application is submitted in outline with all matters reserved apart from access, approval is not sought for this layout and is submitted to demonstrate how the site could be laid out and how the proposed quantum of floorspace can be accommodated on the site.
- 1.9 At Appendix 2 we attach the town centre boundary map for WaterlooVille as defined by Policy AL3.1 'Town, District and Local Centres' on the HBLP WaterlooVille Policies Map.
- 1.10 This STR has been structured as follows:
- In Part 2 we describe the Scheme and set out which elements fall under Main Town Centre Uses.
 - In Part 3 we describe the relevant planning policy context regarding the application of the sequential test. In so doing we identify the Primary Shopping Area (Policy AL3.2) and town centre boundary for WaterlooVille (Policy AL3.1) as outlined within the HBLP, in addition to the relevant policies of the NPPF and the PPG regarding the application of the sequential test.
 - In Part 4 we set out the implications of long-standing case law regarding the application of the sequential test.

- In Part 5 we describe the methodology which has been undertaken for this sequential test. The methodology has had regard to the layout of Waterloo, the lack of any significant allocations in the HBLP and relevant policy guidance and case law regarding the application of the sequential test to town centre uses.
- In Part 6 we set out our assessment of sites identified through the sequential test exercise.
- In Part 7 we set out our conclusions.

1.11 The implications of the sequential test are considered fully in the RLS prepared by MWA Planning and the SPS prepared by HLPC.

2.0 THE PROPOSED SCHEME

- 2.1 The Scheme details are described in both the SPS prepared by HLPC and the Design and the Access Statement prepared by HNW Architects.
- 2.2 The overall site area is 3.86hectares. This contains the Application Scheme for which planning permission is sought.
- 2.3 The Planning Application is supported by an illustrative layout which outlines the proposed land use mix.
- 2.4 In order to assist the sequential test exercise we first identify which of the above uses should be considered inappropriate for the application of the sequential test i.e. which of those uses which are not defined as main town centre uses in the NPPF e.g. B2 and B8 (including trade counters)
- 2.6 Accordingly, the sequential test exercise has been undertaken on the basis of trying to identify a site of this size within or on the edge of the town centre since other out-of-centre locations are evidently not sequentially preferable.
- 2.8 We comment upon the relevance of case law to the sequential test exercise and, in particular, on the issue of disaggregation in Section 4 below albeit the NPPF does not necessarily require a developer to disaggregate their proposed scheme.

3.0 PLANNING POLICY CONTEXT

- 3.1 The planning policy context relating to the Scheme, including retail impact matters, is identified in the accompanying SPS and RLS. Accordingly, we focus on those policies that are relevant to the application of the sequential test.

1. Local Plan Policies

- 3.2 The town centre boundary of Waterloooville is defined on the HBLP Policies Map. Policy AL3.1 identifies the extent of town centres and Policy AL3.2 outlines the 'Primary and Secondary Shopping Frontages' within Waterloooville' town centre.
- 3.3 The site is one of 5 sites allocated for mixed-uses under Policy WA2 of the Site Allocations Plan. Specifically, the site is allocated under BD54 for economic development, hotel and leisure uses. The site is defined as out of centre for retail uses, and edge of centre for the other NPPF Main Town Centre Uses, The site is within a safe ten-minute/800m walking distance of the town centre and therefore the Site can reasonably be defined as an accessible location which is well connected to a town centre (NPPF paragraph 90e refers) .
- 3.4 Policies regarding the application of the sequential test are outlined within Core Strategy (CS) Policy CS4 and Policy DM19. These Policies reflect the need, underpinned by the sequential test, to promote and protect the vitality and viability of town, district and local centres at the same time as maintaining an element of flexibility in order to be able to adapt to future economic changes.
- 3.5 It is noted in the Policy AL3 of the HBLP that the town centres will be promoted as a primary location for main town centre uses which include Retail, Leisure, Cultural and Office development.

- 3.6 The HBLP advises at paragraph 3.49 that approximately 4,000 square metres net of new comparison goods floorspace should be located in the west of Havant Borough with approximately 9,000 square metres net in the east. It advises that sites will be allocated in the Allocations Plan to meet these needs.
- 3.7 The issues of vitality and viability are addressed directly in the RLS.
- 3.8 The supporting paragraphs refer to the national policy set out in the NPPF.

2. NPPF Town Centre Policy

- 3.9 NPPF paragraph 91 requires a sequential test for planning applications which contain main town centre uses but which are not in an existing town centre and which are not in accordance with an up-to-date Local Plan. The advice states that applications for main town centre uses should be located in town centres, then in edge-of-centre locations and only then, if suitable sites are not available, should out-of-centre sites be considered. The reference to 'availability' is clarified by reference to this being within 'a reasonable period', although the length of this period is not quantified.
- 3.10 When considering edge-of-centre and out-of-centre proposals, preference should be given to accessible sites that are well connected to the town centre as is evidently the case with the Site. The definition of the edge of centre is set out in the Glossary to the Framework and this states that retail proposals within 300m of the primary shopping area can be regarded as edge of centre and other town centre uses are classed as edge of centre if they are within 300m of the town centre boundary.
- 3.11 The Transport Statement prepared by David Tucker Associates comments in more detail upon the accessibility of the Application Site to the town centre and conclude that the Application Site is in a highly sustainable location.

3. National Planning Practice Guidance

- 3.12 The National Planning Practice Guidance supplements the policies contained in the National Planning Policy Framework. Further guidance on the application of the sequential test is set out in the 'Ensuring the Vitality of Town Centres' section. The requirements of paragraph 91 of the NPPF are reiterated. It is confirmed that the purpose of the sequential test is to guide main town centre uses towards town centre locations first, then, if no town centre location is available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of town centre locations. Preference is given to accessible sites which are well connected to the town centre.
- 3.13 Paragraph 010 (reference ID: 2b-011-20190722) provides guidance on how the sequential test should be used in the decision-making process. It is for the applicant to demonstrate compliance with the sequential test. Local planning authorities should support the applicant in undertaking the sequential test. The application of the test should be proportionate and appropriate to the given proposal. A checklist of considerations for the sequential test is provided. The checklist requires the need to demonstrate flexibility and to consider the suitability of more central sites. Consideration should then be given to flexibility in the format and/or scale of the proposal.
- 3.14 The concluding, third bullet point of paragraph 011 is clear, in that if there are no suitable sites in sequentially preferable locations then the sequential test is passed. Suitable sites must be sites that are available and appropriate for the given proposal. Appropriate sites include available sites, or expected to become available within a 'reasonable' period, that can accommodate the proposal but it should be noted that flexibility should be applied to the proposal concerned.
- 3.15 The guidance further advises at paragraph 012 that the use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements. Therefore, there is an inherent

acceptance in the PPG that the sequential test needs to have regard to the economic factors that influence locational decisions of businesses.

3.16 In summary, the application of the sequential test requires:

1. Assessing whether there are any available sites that are suitable and in sequentially preferable locations.
2. Acknowledging the market and locational requirements of the uses concerned.
3. Ensuring the assessment is proportionate and appropriate to the given proposal.
4. Being flexible to demonstrate whether more central sites have been fully considered.

4. Operation of the National Planning Policy Framework

3.17 Neither NPPF policy nor PPG guidance requires a developer to disaggregate their proposals so for the application of the sequential test, the opportunity to divert development to sequentially preferable sites should be applied to the development as a whole.

4.0 CASE LAW IMPLICATIONS REGARDING APPLICATION OF THE SEQUENTIAL TEST

- 4.1 Section 3.0 of this report details the National Planning Policy Framework (NPPF) requirements in respect of the sequential test. The Planning Practice Guidance (PPG) thereafter indicates how the sequential test should be assessed in determining a proposal which is outside of a defined centre and not in accordance with the development plan.
- 4.2 In applying the sequential approach, NPPF paragraph 92 requires applicants and local planning authorities to demonstrate flexibility on issues such as format and scale;
- 4.3 Consequently, prior to undertaking the sequential assessment in support of the application proposals, it is important to summarise the key considerations when determining whether sequential preferable sites (in this instance centre and edge-of-centre) are available and suitable to accommodate the proposed scheme. Whilst NPPF paragraph 92 makes no specific reference to the issue of viability in assessing the suitability of sites a brief overview of viability considerations is also provided for robustness where relevant. Clearly a site which is not commercially viable will not, in practice, be 'suitable' for a development.

SEQUENTIAL TEST CONSIDERATIONS

1) Availability

- 4.4 The NPPF and associated PPG do not set out how to determine whether sequentially preferable sites are available. Both the current NPPF (2023) and PPG (2019) refer to the availability of sequentially preferred sites 'expected to become available within a reasonable period' although it should be noted that period is not defined.

- 4.5 Clarification was given to the definition of ‘availability’ in the December 2017 planning appeal decision in Hull (Kingswood) whereby the Inspector found (para. 59):

‘...it would be unreasonable to exclude sites as non-available where there is a reasonable prospect that they will be both vacant and in single ownership within a matter of months’.

- 4.6 This conclusion is therefore adopted by the applicant in concluding whether sites are likely to become available to accommodate the proposed development.

2) Suitability

- 4.7 There are two important legal judgments in relation to the suitability component of the sequential test:

- **Supreme Court Judgment** in respect of Tesco Stores Ltd (the appellant) v Dundee City Council (the respondent), which was issued on 21st March 2012; and
- **High Court Judgment** in respect of Aldergate Properties Ltd and Mansfield District Council and Regal Sherwood Oaks Ltd, which was issued on 8th July 2016.

- 4.8 An overview of the respective judgments is provided below.

SUPREME COURT JUDGMENT (SCJ) IN DUNDEE

- 4.9 The Dundee SCJ provides a ruling on the interpretation of the ‘suitability’ component of the sequential test. In this case, the Court had to decide whether the word ‘suitable’ means *‘suitable for the development proposed by the applicant’*, or *‘suitable for meeting identified deficiencies in retail provision in the area’* (see paragraph 21 of the Judgment). Subject to the requirement for the applicant to demonstrate flexibility, the court **endorsed the former** and

rejected the latter. The reasoning and clarification are set out in paragraphs 28, 29, 30, 36, 37 and 38 of the Judgment.

- 4.10 In Paragraph 28 of the Judgment, it is confirmed that 'suitable' means suitable for the development proposed by the applicant, but the judgement adds the qualification that there is a need for '*.... Flexibility and realism from developers and retailers as well as planning authorities*'. In paragraph 29, it is specified that provided the applicant has shown flexibility and had regard to the circumstances of the particular town centre, the question that remains is '*.... Whether an alternative site is suitable for the proposed development, **not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site***'.
- 4.11 Finally, Paragraph 38 of the Judgement confirms that '*...**the whole [sequential] exercise is directed to what the developer is proposing, not some other proposal which the planning authority might seek to substitute for it which is for something less than that sought by the developer***' and that '*... developments of this kind are generated by the developer's assessment of the market that he seeks to serve....*' And that the sequential criteria '*... are designed for use in the real world, in which developers wish to operate, not some artificial world in which they have no interest doing so*'.
- 4.12 The Inspector in the aforementioned Rushden call-in inquiry describes the Dundee Judgment as being of '*seminal importance*' and states that it establishes:
- a) '***That if a site is not suitable for the commercial requirements of the developer in question, then it is not a suitable site for the purposes of the sequential approach***'; and:
- b) '***That in terms of the size of the alternative site, provided that the Applicant has demonstrated flexibility with regards to format and scale, the question is whether the alternative site is suitable for the***

proposed development, not whether the proposed development could be altered or reduced so that it can be made to fit the alternative site’.

- 4.13 Further clarification on flexibility is however provided in a more recent appeal decision in Hull (*Kingswood*) whereby the Inspector found (para 33) that:

‘Flexibility in ‘form’ or ‘format; could include: whether the proposal can be provided in one or more buildings; whether space is on one or more levels; how individual units are laid out; and how and where parking and servicing provision is made’.

- 4.14 However, as detailed later in this section, the conclusions reached in the *Kingswood* appeal are based on scheme and site-specific considerations (outline scheme with no named operators seeking flexible permission) which informed the Inspector’s conclusions.

- 4.15 The *Mansfield* Judgment provides further clarification in relation to how the sequential test should be applied and it establishes a number of important principles, as follows:

- 1) *‘In my judgment, “suitable” and “available” generally mean “suitable” and “available” for the broad type of development which is proposed in the application by approximate size, type and range of goods. This incorporates the requirement for flexibility in {24} NPPF and excludes, generally, the identity and personal or corporate attitudes of an individual retailer. The area and sites covered by the sequential test search should not vary from applicant to applicant according to their identity, but from application to application based on their content. Nothing in *Tesco v Dundee CC*, properly understood, holds that the application of the sequential test depends on the individual corporate personality of the applicant or intended operator’ (Paragraph 35 of the Judgment).*

- 2) *Second, ‘.....NPPF [24] positively “requires” retail investment in the first place to locate in town centres rather than elsewhere.... Its thrust is rather more emphatic than those policies on which the Dundee decision was based]... NPPF [24] cannot therefore be interpreted as requiring “suitability” and “availability” simply to be judged from the retailer’s or developer’s perspective, with a degree of flexibility from the retailer, and responsiveness from the authority’ (Paragraph 37 of the Judgment).*
- 3) *‘Third, and of crucial importance here, still less can it [NPPF 24] be interpreted as envisaging that the requirement or preferences of an individual retailer’s trading style, commercial attitudes, site preferences, competitive preferences whether against itself or greater competition should dictate what sites are “suitable” or “available” subject only to a degree of flexibility. NPPF [23] and [24] are simply not couched in terms of an individual retailer’s corporate requirements or limitations (Paragraph 38 of the Judgment).*
- 4) *‘Any alternative approach would reduce the sequential test to one of the individual operator’s preference, with the suitability of centres, sites and their availability varying from applicant to applicant each proposing the same broad type or even identical form of development. This case illustrates just why on the proper interpretation of NPPF [24], the identity of the applicant or proposed occupier is generally irrelevant’ (Paragraph 39 of the Judgment).*
- 5) *“Available” cannot mean available to a particular retailer but must mean available for the type of retail use for which permission is sought’ (Paragraph 42 of the Judgment),*

4.16 Of significant importance, therefore, is the conclusion that there is no inconsistency between the Dundee and Mansfield Judgments because the Supreme Court was referring to the suitability of sites by reference to the type of development proposed by the applicant, and not to the identity of the applicant or proposed operator.

3) Viability

- 4.17 Regarding viability Planning Practice Guidance paragraph 013 states:

‘The sequential test seeks to deliver the government’s ‘town centre first’ policy. However as promoting new development on town centre locations can be more expensive and complicated than building elsewhere local planning authorities need to be realistic and flexible in terms of their expectations’.

- 4.18 The Inspector’s report (para. 8.54) in respect of the aforementioned Rushden call-in Inquiry, states that *‘....the task is to identify sequentially preferable sites that are suitable and available which necessarily includes consideration of deliverability/viability’.* This is further reinforced by the aforementioned (recent) Kingswood appeal decision whereby the Inspector acknowledged that:

‘The PPG at ID 2b-009-20140306 refers to viability as a criterion for identifying sites to meet identified needs for main town centre uses, but again only in the context of plan-making, not decision-taking. Nevertheless, it is material when applying the sequential test to consider whether alternative sites... can be viable in the sense there is a reasonable prospect they could be delivered’.

4) The Requirement for Disaggregation

- 4.28 The sequential test does not require arbitrary disaggregation of the proposal for the purposes of the sequential test.

5) Area of Search/Catchment

- 4.29 As for the previous sequential test report for this Site, the catchment analysed in this sequential test is based on Havant Borough West as defined in HBC’

Town Centres and Retail Leisure Study (2009). The application proposal will predominantly serve Waterlooville and its immediate hinterland rather than Havant; this is the primary catchment for the proposal and is justifiable on the basis that Waterlooville is one of just two main Town Centres identified in the HBLP.

- 4.30 Therefore, seeking to direct the proposed development to the other HBLP main town centre i.e., Havant would not address the current needs / deficiencies of Waterlooville.

6) Site Search

- 4.31 Notwithstanding the NPPF a 'Primary Shopping Area' is not defined on the HBLP Policies Map it is reasonable to say that for retail use the Site is in an out-of-centre location being more than 300m from a Primary Shopping Frontage. Having said that there is an extant permission i.e., APP/18//01072 which allows for up to 4,334m² of A1 retail floorspace. Whilst condition 11 restricts the retail space to certain types of goods all retail floorspace now falls under Class E. Regarding the other proposed Main Town Centre Uses e.g., leisure, hotel offices etc the Site is in an edge-of-centre location as it is evidently within 300m of the defined town centre for Waterlooville. Furthermore the site is allocated, policy BD54 refers, in the HBLP for mixed commercial uses including hotel, offices and leisure and the extant planning permission allows for these as well.. Consistent with NPPF policy and PPG the Site is also very accessible regarding its juxtaposition and pedestrian infrastructure from/to Waterlooville town centre
- 4.33 Therefore, out-of-centre sites further remote from the town centre have been discounted from the assessment. Only available in-town centre sites and well connected edge-of-centre sites have been considered.

5.0 METHODOLOGY FOR UNDERTAKING THE SEQUENTIAL TEST EXERCISE

- 5.1 The Applicant has previously assessed the suitability and availability of sites in 2013 and 2018. The methodology for both of those reports was the same and accepted by HBC and is set out below:-
- 5.2 We have identified the HBLP' Primary Shopping Frontage (PSF) and town centre boundary by reference to the adopted Policies Map. (See Appendix 2 for relevant plans).
- 5.3 Using CoStar we identified all currently available sites in the defined town centre and within 300m of the town centre boundary which clearly includes potential sites within 300m of the Primary Shopping Frontage. It should be noted that there are no current plans for the re-development of Waterloooville town centre so the potential opportunities are occupied by buildings and would need vacating/clearing before they were genuinely available for development. We have not looked at other out of centre sites beyond this area as they are sequentially no more preferable than the Application Site.
- 5.4 We have looked at the suitability of available sites for the scale of the proposed retail element i.e., 4,334m² of the overall scheme. All the available town centre sites are Previously Developed Land so it is reasonable to assume that they could not be discounted on policy grounds e.g., protection of public open space.
- 5.5 We have not ruled out any sites which are available notwithstanding some might not be genuinely so. It is noted that a number of available sites were also available in the previous two sequential test reports.
- 5.6 We have adopted a very conservative approach in respect of disaggregation in that the site size threshold is that which could accommodate a single storey retail outlet(s). We could have used the total size of the Site in which case there is evidently no sequentially better site in Waterloooville.

6.0 ASSESSMENT OF SITES

- 6.1 The assessment has focused on the town centre of Waterlooville. As was the case in the previous two assessments there are no cleared and available sequentially better sites rather all of them are currently occupied by buildings which are invariably two-storey and dated both in terms of looks and functional design. Aside from the former Waitrose store, which closed in 2020, all the units tend to be very small scale and certainly not near to the size needed. Another feature of Waterlooville town centre is that there is an absence of dedicated parking for any individual retail unit rather they all share public pay-and-display facilities.

Retail Sites

- 6.2 In assessing available sites, consideration has been given to whether the requirements of an operator could be adequately met. These include the ability for the site to be appropriately serviced by delivery vehicles and whether there is suitable car parking provision available in the interests of highway safety and impact. In addition, the commercial viability of redevelopment must also be a factor for consideration, taking into account any existing site constraints.

Vacant Sites

- 6.3 Using CoStar (2024) we identified a total of 16 available sites which are within the defined town centre boundary for Waterlooville. For each site below we set out the available space in square feet (ft²), bearing in mind the E Use Class (retail) requirement is for approximately 43,000ft² (single storey). All sites were not considered large enough to accommodate the proposed development. We then set out the other reason(s) for discounting them.
- a) Carrick House (former Waitrose store), Dukes Walk; 28,972ft²; 2 storey; no dedicated store parking.

- b) 1 – 11 Dukes; 2,949ft²; 2 storey; no dedicated store parking; viability concerns as whole building would have to be demolished and the site is too linear.
- c) London Road; 436ft²; 2 storey; no dedicated store parking.
- d) 99 – 101 London Road; 2,990ft²; other reasons as for c) above.
- e) 256 London Road; 676ft²; other reasons as for c) above.
- f) 286 – 288 London Road; 4,961ft²; other reasons as for c) above.
- g) 1 – 11 Wellington Way; 3,126ft²; other reasons as for c) above.
- h) 13 Wellington Way; 980ft²; other reasons as for c) above.
- i) 15 Wellington Way; 446ft²; other reasons as for c) above.
- j) 16 Wellington Way; 431ft²; other reasons as for c) above.
- k) 29 Wellington Way; 920ft²; other reasons as for c) above.
- l) 30 Wellington Way; 570ft²; other reasons as for c) above.
- m) 33 Wellington Way; 959ft²; other reasons as for c) above.
- n) 34 Wellington Way; 850ft²; other reasons as for c) above.

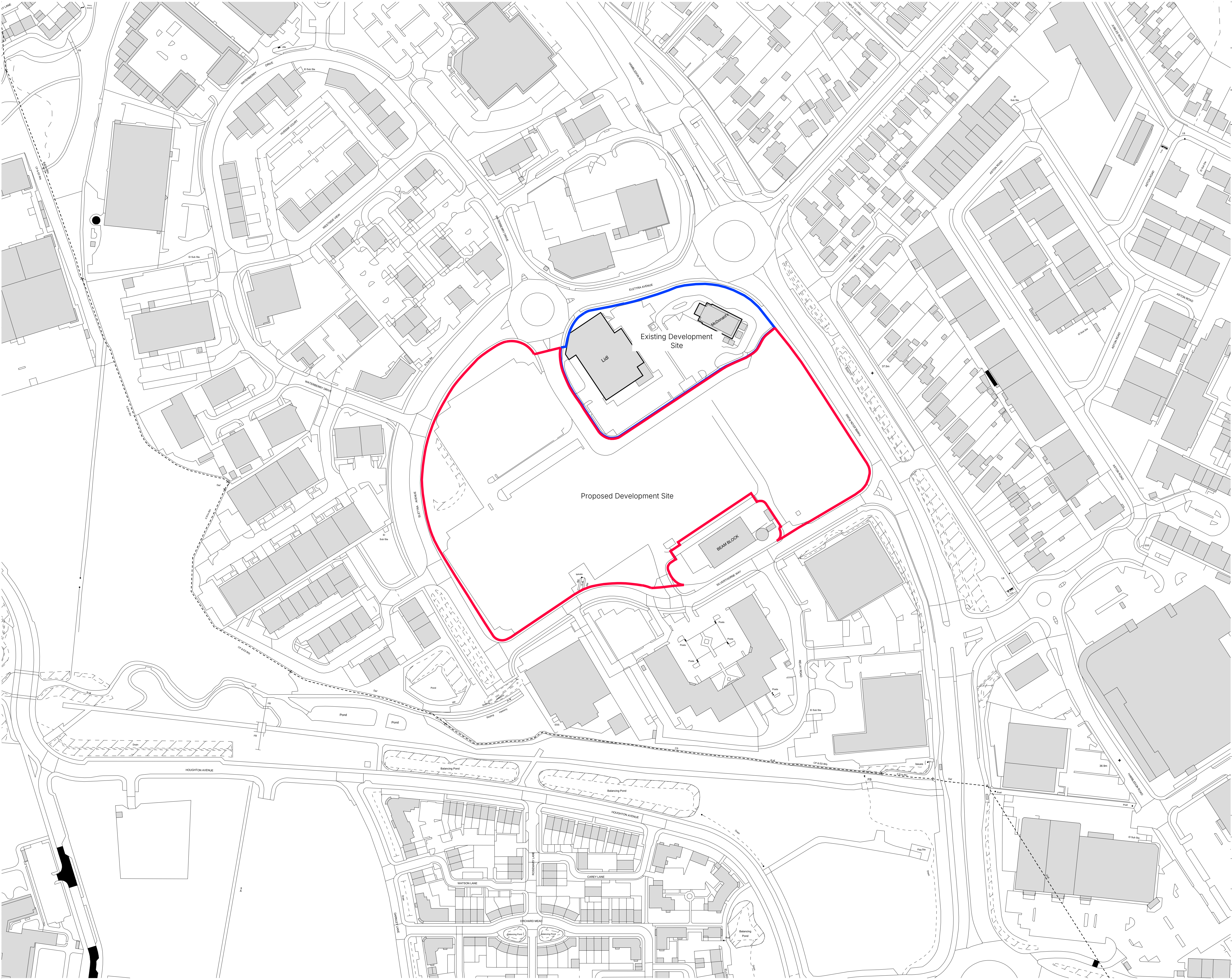
6.4 We also need CoStar (2024) to see if there were any available and sequentially preferable sites beyond Wellington Town Centre. A total of 12 sites were identified. Only 3 of these are geographically close to Waterlooville. The remaining 9 are located in other settlements in Havant Borough e.g., Horridgean, Cowplain, Dunmead, Parbrook and Widley. These

have been discounted as they are not sequentially preferable than the application site.

7.0 CONCLUSIONS

- 7.1 There are no sequentially preferable or available sites that are suitable. The results are not reasonably predictable given the outcomes of the previous sequential test assessments and the make-up of buildings in Waterlooville town centre which was originally designed for a much smaller population. This is likely to be the main reason why the defined town centre boundary has been enlarged to envelop subsequent larger scale retail developments e.g., Sainsbury's.
- 7.2 We are therefore firmly of the view that there are no reasonable opportunities in Waterlooville' defined centre, nor indeed on the edge of the centre, on which the scale of the proposed retail development can be accommodated. Given that the NPPF' sequential test is passed.

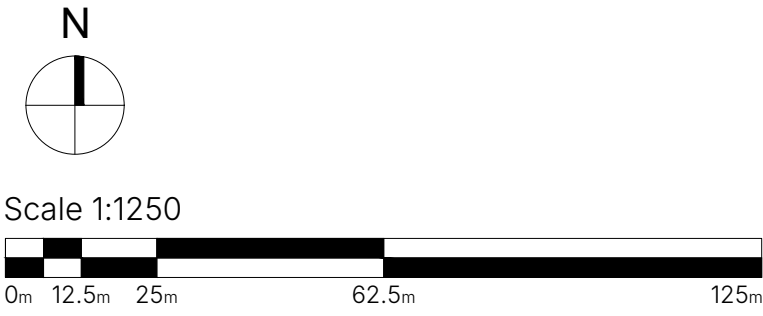
APPENDIX 1



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Note:
Setting Out is based on OS data and survey drawing by
Lewis Brown Chartered Land Surveyors
Ref: Topographical Survey - W15306_3DSX
Dated: October 2015

Note: Design Intent
This drawing illustrates design intent only and is subject to
Manufacturer's and or Specialist Subcontractor's Detailed
Design & Specification.



P01	Outline Planning Issue	RW	SD	19.08.24
Rev	Amendments	By	Chkd	Date



HNW
Architects

Document Status
Preliminary

Client Name
HARGREAVES

Project Name
ELETTRA AVENUE, WATERLOO PARK
WATERLOOVILLE, HAVANT

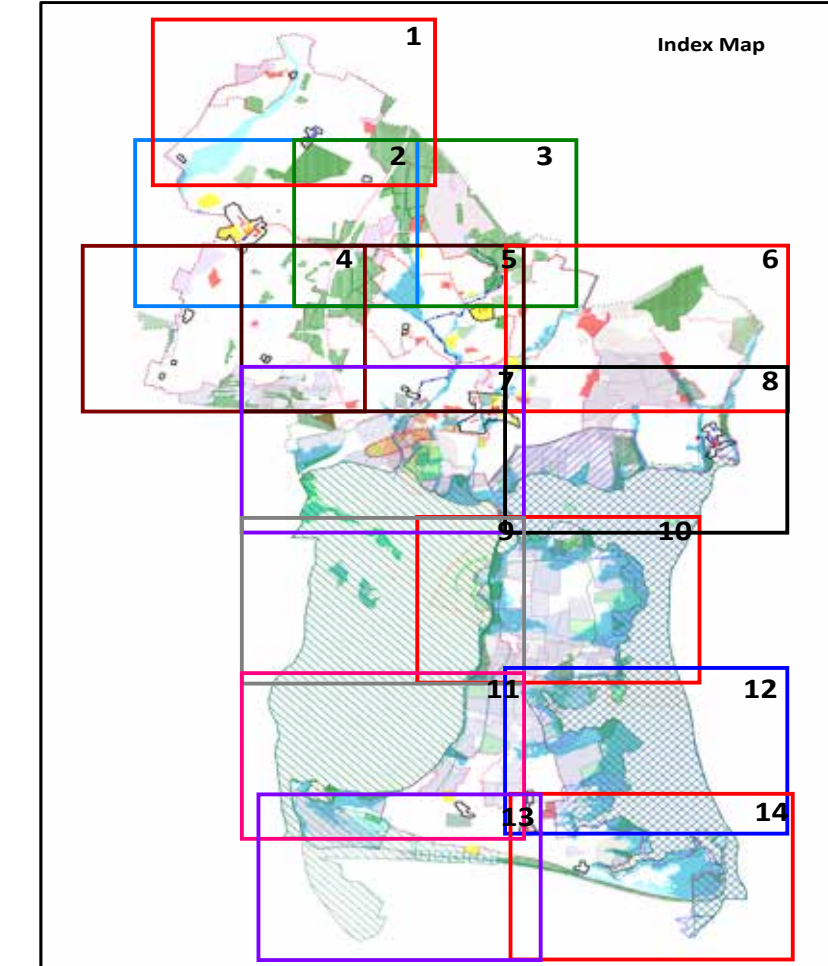
Scale	HNW Project No.	Date Created
A1- 1:500	24018	MAY 2024

Document Title
SITE LOCATION PLAN

Document Reference	Revision
24018-HNW-ZZ-ZZ-DR-A-1100	P01

Chichester Brighton & Hove	61 North Street, Chichester, PO19 1NB Plattfirm, Church Road, Hove, BN3 2AF	01243 533300 01273 932485
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Appendix 2



Appendix 3

Note:
Setting Out is based on OS data and survey drawing by
Lewis Brown Chartered Land Surveyors
Ref: Topographical Survey - W15306_3DSX
Dated: October 2015

Note: Design Intent
This drawing illustrates design intent only and is subject to the Manufacturer's and or Specialist Subcontractor's Details and Design & Specification.



Key:

 Application Boundary

☐ Other Land in Applicant Ownership

 Underground Public water storm sewer with 3 meter no build easement required either side.



Scale 1:500

P01	Outline Planning Issue	RW	SD	05.09.24
Rev	Amendments	By	Chkd	Date



HNW Architects

Document Status
Preliminary

Client Name
HARGREAVES

Project Name
ELLETRA AVENUE, WATERLOO PARK
WATERLOOVILLE, HAVANT

Scale	HNW Project No.	Date Created
A1-1:500	24018	Sept 2024

Document Title
PROPOSED SITE PLAN - INDICATIVE
SITE LAYOUT

Document Reference	Revision
24018-HNW-ZZ-ZZ-DR-A-2102	P01

Chichester	61 North Street, Chichester, PO19 1NB	01243 533300
Brighton & Hove	Platt9rm, Church Road, Hove, BN3 2AF	01273 932485

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PLANNING



**PROPERTY
MANAGEMENT**



RATING



**RECEIVERSHIP
AND RECOVERIES**



**RETAIL, LEISURE
AND ROADSIDE**



VALUATION