

Planning Statement

Former Landfill Site, Brockhampton West, Harts Farm Way, Havant

Prepared on behalf of Clowes Developments (UK) Ltd

February 2021

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1. INTRODUCTION

- 1.1 This planning statement has been prepared on behalf of Clowes Developments (UK) Ltd to support an outline planning application for the development of land at Brockhampton West. This proposal is for the development of new employment units to provide up to 29,000 sq m (gross internal area) for flexible use across use classes E (light industrial), B2 and B8 with ancillary offices, car parking, service yards, drainage works, landscaping and associated works to prepare the site for development. All matters are reserved except the primary means of access to the site.
- 1.2 The site falls within the administrative area of Havant Borough Council and consists of undeveloped grassland as well as a small area of hardstanding. In policy terms, the site is allocated for flexible employment use in both the adopted and emerging development plans.
- 1.3 This statement provides a summary of the proposed development and identifies the key planning considerations that should be taken into account in its determination and establishes the justification for the development of this site at this time.
- 1.4 This statement has been structured to review the specific conditions of the site, the planning context that frames this proposal and assesses the development against the relevant planning policy framework.
- 1.5 A pre-application was submitted for this application and the relevant validation requirements were agreed with the Council. This document should be read in conjunction with the planning drawings and the following reports that support this application:
- i. Air Quality Assessment
 - ii. Arboricultural Impact Assessment & Tree Survey (forming part of the LVIA)
 - iii. BREEAM Pre-Assessment Report
 - iv. Built Heritage Statement
 - v. CIL Additional Information Form
 - vi. Correspondence from DTRE dated 13 February 2021, providing an employment market overview
 - vii. Design and Access Statement
 - viii. Illustrative Drainage Strategy Drawing 4199 / 50 Rev. P4
 - ix. Ecological Impact Assessment (incorporating Habitat Regulation Assessment)
 - x. Energy Strategy
 - xi. Drainage Strategy
 - xii. Flood Risk Assessment
 - xiii. Framework Travel Plan (forming part of the Transport Assessment)
 - xiv. Landscape and Visual Impact Assessment
 - xv. Lighting Strategy
 - xvi. Preliminary Geo-Environmental Risk Assessment

- xvii. Proposed Section 106 Heads of Terms
- xviii. Transport Assessment
- xix. Utilities Statement

2. THE PROPOSAL

2.1 This application is submitted as an outline planning application for flexible employment premises within use classes E (light industrial), B2 and B8 with ancillary office use.

2.2 The description of development is therefore as follows:

Outline application for the development of new employment units to provide up to 29,000 sq m (gross internal area) for flexible use across use classes E (light industrial), B2 and B8 with ancillary offices, car parking, service yards, drainage works, landscaping and associated works to prepare the site for development. All matters are reserved except the primary means of access to the site.

2.3 The Application site is presented in Figure 1 below:



Figure 1: Application Site Boundary

2.4 The outline application approach will agree the key principles of the proposed development and retain sufficient flexibility for the site to accommodate different occupier's requirements in due course, which will be detailed within subsequent Reserved Matters submissions.

2.5 To ensure that a robust assessment of the proposals could be made, maximum parameters for the development have been identified. These parameters are shown on the submitted parameters plan that

is intended to form an approved drawing to any planning permission to guide future detailed proposals at the site. These parameters can be summarised as follows:

- i. Maximum floorspace, 29,000 sq m (GIA)
- ii. Maximum building height 18.5 m from FFL
- iii. Maximum extent of development zone
- iv. Strategic Landscape Zones
- v. Primary Site Access and Secondary Access Zone

- 2.6 It is proposed that finished floor levels will be from approximately 11 metres to 14 metres AOD.
- 2.7 Whilst the form of the proposed buildings has not yet been defined, three illustrative layouts have been prepared demonstrating how the site could accommodate different schemes providing respectively one, two and three employment units.
- 2.8 There is significant demand for employment premises of up to c. 29,000 sq m that have internal clear heights of up to 15m. The parameters will allow for known requirements in this area to be accommodated at the site. Units that have a clear internal height of 15 m will have a maximum external height of up to 18.5 metres from the finished floor level to the ridge of the roof.
- 2.9 There is currently access onto the site off Harts Farm Way but it is proposed that this will be closed and a new access off Harts Farm Way will be created. The application details the primary means of access into the site, which is shown to the east of Harts Farm Way and is identified in blue shading on the submitted parameters plan. The ability to secure a second access into the site further to the west is also proposed as this may be required by occupiers wishing to secure greater flexibility. An access zone where this potential secondary access could be provided is shown by the blue dashed line on the parameters plan.
- 2.10 This proposal represents an opportunity to create a high-quality sustainable employment development to accommodate the needs of future occupiers and meet market demand. The proposed development will make efficient and effective use of the site.

3. SITE CONTEXT

- 3.1 The site is approximately 8.3ha / 20.5 acres in size and situated on Harts Farm Way, to the south-west of Havant and Bedhampton.
- 3.2 The site is reclaimed land and has previously been used as landfill for a variety of refuse materials, understood to include household waste and material from road construction. It is otherwise undeveloped and currently accommodates a gravelled parking/turning area in the middle of the site with vegetation covering the majority of the site and mature tree planting around much of the perimeter. The southern boundary of the site has overhead electricity lines running along it, suspended on timber posts.
- 3.3 The site is bordered by the A27 to the north and beyond that, agricultural fields around Old Bedhampton. The Hermitage Stream separates the site from the existing employment areas to the east along Harts Farm Way, as well as waste management and water treatment uses that define the urban area to the east and south east of the site.
- 3.4 Access onto the site is currently available from the south via Harts Farm Way. Harts Farm Way runs east to west and connects to the A27 via the Teardrop Junction and also provides access to other existing employment uses to the east of the site. A shared pedestrian and cycle path, which is part of National Cycle Route 22, runs alongside Harts Farm Way on the southern side.
- 3.5 The site is well-connected to the local road network, as it is in very close proximity to the A27 and A3(M), providing connections to the wider South Coast area and north to Guildford and London.
- 3.6 In terms of public transport, the nearest bus stop is just over 1km from the site and Bedhampton train station is located approximately 1 mile to the north.
- 3.7 There are a network of footpaths in the vicinity of the site with a public right of way to the east of the site running along the Hermitage Stream, that connects to a continuing network of footways on the northern side of the A27 via a footbridge, and routes around the Broadmarsh Coastal Park and Langstone Harbour to the south of Harts Farm Way.
- 3.8 Broadmarsh Coastal Park adjoins the site to the south and west. Beyond the coastal park is Langstone Harbour, which is approximately 170 metres from the site boundary and is designated as a SSSI, with the Farlington Marshes nature reserve to the south west of the Harbour.
- 3.9 The site is situated within Flood Zone 1.
- 3.10 The nearest heritage assets are:
- Grade II listed Old Mill House, approximately 300 metres north-east of the site; and
 - Old Bedhampton Conservation Area, 150 metres north-east of the site on the other side of the A27.

- 3.11 As a result of the previous landfill activities on the site, the levels vary significantly. The site is elevated in relation to both Harts Farm Way and the A27, with the western part of the site generally flat open grass land, whilst the eastern part of the site has a significant mound on it with landfill underneath. The levels then slope down on the northern boundary towards the A27 and down towards the Hermitage Stream to the east. It should be noted, however, that with the exception of a small area required to implement the drainage outfall to the Hermitage Stream, the application boundary of the proposed site does not extend down to either the A27 or the Hermitage Stream.
- 3.12 The site is relatively self-contained with mature vegetation comprising trees and hedges around its perimeter, providing screening and separation from the immediate surroundings.

4 PLANNING HISTORY

- 4.1 There is no recent planning history of relevance at the site. Under the management of Hampshire County Council, it is understood that the site was used for landfill until the 1990s, which has resulted in the site being more elevated than the immediate surroundings.
- 4.2 It is also understood that the site has previously benefitted from planning permission for the temporary siting of facilities related to the sites occasional use as playing fields. However, the site has not been in use as playing fields for a number of years and is not designated as open space or playing fields. Following the cessation of landfill activities, the site has been left in an unmanaged state so that vegetation and trees at the site have been allowed to grow as they see fit.

5 CONSULTATIONS

- 5.1 The 2019 National Planning Policy Framework (NPPF) encourages early engagement in pre-application discussions with local authorities to ensure detailed awareness of emerging proposals. Proposals have been informed by pre-application discussions with Hampshire Highways, Highways England, Natural England, The Environment Agency and officers at Havant Borough Council.

Discussions with Stakeholders

- 5.2 The discussions with these key stakeholders have informed the development proposals and have been taken into account on the preparation of this application.
- 5.3 Discussions with Hampshire County Council and Highways England have defined the scope for the Transport Assessment and the modelling work required to assess the impacts of the proposed development.
- 5.4 Discussions with the Environment Agency have informed the scope of the Ground Investigations for the site and what is required during the works to develop the site in respect of dealing with the existing waste at the site and securing a suitable drainage solution for the site.
- 5.5 Natural England were also contacted as part of pre-application discussions and a meeting was held with them to review the site's status as a potential habitat for Brent Goose. At the meeting, it was confirmed that the site was unlikely to be suitable habitat for Brent Goose in its current state, which was supported by previous surveys for Brent Goose that demonstrated it had little use from the birds and also the presence of long grass and trees around the site.
- 5.6 The discussions with Natural England confirmed that the site was not likely to support Brent Goose in its current state, so the development would not directly impact on loss of habitat. However, with appropriate management the site had the potential to become suitable habitat, so under the terms of the Solent Wader and Brent Goose Mitigation strategy some form of mitigation was required.
- 5.7 Discussions with the planning officers at Havant Council were of assistance in scoping the material that needed to be submitted with the application and to review relevant policies that related to the proposed development of the site.
- 5.8 The outcome of the pre-application discussions was that the principle of developing the site for employment use was acceptable and that any application would need to be supported by a range of reports to assess the development. Whilst the allocation for the site identified an anticipated quantum of development for the site, it was clarified that a higher amount of floorspace would be acceptable if it could

be demonstrated that the site could accommodate the proposed development without giving rise to any unacceptable impacts.

Other Consultations

- 5.9 Due to the current restrictions arising from the Coronavirus pandemic, the ability to undertake community consultation has been curtailed. The application site is not immediately adjacent to any neighbours that would normally be .
- 5.10 The usual way to secure additional consultation outside of the stakeholders that were contacted as noted above, would normally be through the Development Consultation Forum that is convened by Havant Borough Council, but this is not currently taking place as a result of the restrictions.
- 5.11 In preparation of the planning application there has also been engagement with local political stakeholders. The site is located within Bedhampton ward but sits on the boundary with St. Faith's ward. The adjacent employment areas to the east are located within St. Faith's ward and it was therefore deemed that the development would be of interest to councillors of both wards.
- 5.12 Emails were sent out to the local ward councillors of the Bedhampton and St. Faith's wards in January 2021 to inform them that the application was being prepared and to see if they wanted to raise any specific issues about the proposed development of the site.
- 5.13 The emails sent out outlined the investment plans to develop Brockhampton West, noting who the developer is and the type of planning application that would be submitted. The mailshot provided more details of the site location as well as the proposed uses of the site and some of the benefits the development will provide. It was also confirmed that a full range of reports would support the application to assess the impacts from the proposals. The emails and mailshots were sent out to provide the opportunity to answer any queries that Councillors may have about the emerging proposals prior to the submission of the application.
- 5.14 At the time of submission, three responses had been received commenting that the site has long been under-utilised and that its contribution to employment growth in Havant would be welcomed. Comments were also received to note that measures to improve connectivity to the site and the Broadmarsh Coastal Park and the Solent Way would be welcomed.

6. PLANNING POLICY FRAMEWORK

6.1 This section reviews the national and local planning policy considered relevant to the application proposal.

6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires local planning authorities to determine any planning application by having regard to the policies set out within the prevailing Development Plan, unless material considerations would indicate otherwise.

6.3 Any application for this site will therefore be assessed against the policies in the adopted Development Plan and the following documents will need to be considered in the preparation of any new planning application for this site:

National

- National Planning Policy Framework – MHCLG (2019)
- Planning Practice Guidance – MHCLG (2018)

Regional

- Hampshire Minerals & Waste Plan (2013)
- Solent Waders & Brent Goose Strategy Steering Group (2010)
- Solent Waders & Brent Goose Strategy: Guidance on Mitigation and Off-setting Requirements (2018)

Local

- Core Strategy (2011)
- Site Allocations Plan (2014)
- Emerging Havant Borough Local Plan 2036 – Submission version
- Opportunity Havant Regeneration Strategy (2018)

6.4 On 12th February 2021, the new Local Plan for Havant was submitted for examination to the Secretary of State for Housing Communities and Local Government. The policies within this document should be given some weight as it will likely be adopted in the near future and gives an idea as to the direction of travel for detailed planning policy.

National Planning Policy Framework (NPPF), 2019

6.5 The NPPF sets out the Government's overarching objective to encourage sustainable economic development which will be assisted by the planning system.

- 6.6 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.
- 6.7 For decision-taking this means - approving development proposals that accord with the development plan without delay (paragraph 11).
- 6.8 The NPPF identifies three strands to sustainable development comprising an economic role, a social role and an environmental role (paragraph 8). The economic role should help to create an economy that is '*strong, responsive and competitive*', whilst the social role should support the creation of '*strong, vibrant and healthy communities ...that reflect the community's current and future needs and support its health, social and cultural well-being*'. The environmental role should ensure that the natural, built and historic environment is protected and enhanced.
- 6.9 The support for economic growth continues within Section 6 where considerable emphasis is placed upon support for development that contributes to economic growth as follows (paragraph 80):
- Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.*
- 6.10 The NPPF also notes that certain uses have specific requirements for their geographic location. Paragraph 82 states that decision should '*recognise and address the specific locational requirements of different sectors*' including for '*storage and distribution operations at a variety of scales and in suitably accessible locations*'.
- 6.11 Planning policies should proactively encourage sustainable economic growth, identifying or setting criteria for strategic sites and be flexible enough to accommodate needs not anticipated in the plan.

Regional Planning Policy and Relevant Guidance

Hampshire Minerals and Waste Plan (2013)

- 6.12 The plan is intended to ensure that the County benefits from sufficient capacity to process waste and maintain an appropriate supply of minerals up to 2030. As a result, the document seeks to bring forward mineral or waste developments that are well-timed and suitably located.
- 6.13 The plan identifies the site as a Minerals Safeguarding Area, which is underlain by sand and gravel and beneath that, chalk. In the south-eastern corner, the site is also partially overlapped by Bedhampton Aggregates Wharf which is used for mineral processing.
- 6.14 The following policies in the plan are relevant to Brockhampton West:

Policy 15 – Safeguarding – mineral resources

- 6.15 As a Minerals Safeguarding Area, the site is subject to Policy 15 of the Minerals and Waste Plan, meaning that the application must demonstrate one of the following: mineral resources will not be sterilised, mineral extraction on the site is inappropriate, development does not restrict mineral development in the area or the benefits of the development 'outweigh the safeguarding of the mineral'.

Policy 19 – Aggregate wharves and rail depots

- 6.16 Bedhampton Wharf is listed as a site which should be protected and, where possible, enhanced to maintain a supply of sand and gravel.

Solent Waders and Brent Goose Strategy (2010)

- 6.17 The Solent Waders and Brent Goose Strategy sets out the general context and ecological information to Brent Geese and their habitat.
- 6.18 The Strategy includes mapping to identify locations and land within the Solent area that are known to support Brent Goose and other wading birds. The western most part of the Brockhampton West site is identified as site H08, which is noted as a 'Low Use' site with an area of 5.16 Ha. The Low Use categorisation means that the site has records of birds '*but in low numbers*'. This category is at the lowest end of the site classification hierarchy. It should be noted that part of the designation on the mapping includes part of Harts Farm Way within the 5.16 Ha quoted as Brent Goose habitat.

Policy W&BG5

- 6.19 This policy focuses on developments, explaining that applications must demonstrate the potential level of impact to a designated Breen Goose site. It is stated that if harm caused by the development cannot be avoided or sufficiently mitigated, then compensation will be required. The development must also satisfy the relevant Habitats Regulations tests.

Solent Waders and Brent Goose Strategy: Guidance on Mitigation and Off-setting Requirements (2018)

- 6.20 The purpose of the strategy is to safeguard the existing network of non-designated terrestrial wader and Brent goose sites which form a part of the Solent Special Protection Areas. The strategy encourages development to avoid sites which are included within the ecological network but highlights appropriate mitigation and off-setting measures which can be taken to ensure that the network is protected.
- 6.21 For 'Low Use' sites, it is suggested that any impacts from the development should be mitigated on-site. However, the guidance also provides the option of providing compensatory habitat through off-site options and/or agreeing a financial contribution to enhance other areas of habitat. The guidance states that the financial contribution for mitigating development on a 'Low Use' site is a contribution of £35,620 per hectare.

Local Planning Policy

- 6.22 Havant Borough Council's Adopted Local Plan currently consists of the Core Strategy (2011) and the Site Allocations Plan (2014). Havant have also been working towards the adoption of a new Local Plan for the period up to 2036. The new plan was submitted for examination to the Secretary of State on 12th February 2021.

Havant Borough Core Strategy (2011)

Policy CS2 – Employment

- 6.23 Policy CS2 notes that the Council has an objective of providing a total of 162,000 sq m of new employment floorspace up to 2026, comprising 45,000 sq m of B2 floorspace and 41,500 sq m of B8 floorspace. It is also noted in this policy that the Council will promote existing business clusters, create jobs and seek to improve skills by securing training on new sites, particularly during construction.

Policy CS3 – Skills and Employability

- 6.24 Policy CS3 notes that proposals will be granted permission where they improve skills across the Borough and address issues such as skill shortages and removing barriers to employment for those that are currently inactive.

Policy CS7 – Community Support and Inclusion

- 6.25 Policy CS7 promotes community engagement for new proposals to allow local people to be involved so that their views can inform development within the Borough.

Policy CS11 – Protecting and Enhancing the Special Environment and Heritage of Havant Borough

- 6.26 The objective of Policy CS11 is to ensure that key areas of landscape, heritage and environmental value are protected and enhanced wherever possible. Proposals that may have adverse impacts will need to be adequately mitigated. Particular mention is made of a range of sensitive sites across the Borough which this policy seeks to protect. This includes sites which provide areas of habitat for Brent Geese and wading birds as well as Listed Buildings and Conservation Areas.

Policy CS13 – Green Infrastructure

- 6.27 Policy CS13 aims to manage areas of green infrastructure that are identified at sub-regional and local levels. Proposals will need to ensure that they do not undermine the integrity of areas of green infrastructure, and development that enhances or creates new areas of green infrastructure will be supported.

Policy CS14 – Efficient Use of Resources

- 6.28 This policy notes that development should contribute to the efficient use of resources and non-residential development over 500 sq m should seek to achieve a BREEAM target of Very Good and that particular attention should be paid to water efficiency measures. It is also stated that major areas of development should maximise measures to improve energy efficiency and include renewable energy sources.

Policy CS15 – Flood and Coastal Erosion Risk

- 6.29 This policy reiterates national policy that development should be located where flood risk is low or manageable. It also requires new development to provide Sustainable Drainage measures with a target of ensuring no net increase in surface water runoff and that appropriate management measures are in place.

Policy CS16 – High Quality Design

- 6.30 Policy CS16 requires new development to be of a high quality that responds to the site's context and to produce a positive relationship between the building and its natural and built surroundings. Any negative impacts of the development should be mitigated through the use of sustainable design and construction methods that also seek to minimise waste.

Policy CS17 – Concentration and Distribution of Development within the Urban Areas

- 6.31 Policy CS17 requires new development to be located within the existing urban area wherever possible and to make best use of redundant, derelict or underused land. The distribution of development should be in accordance with the Key Diagram, which identifies that Havant will accommodate 76,121 sq m of new employment floorspace.

Policy DM8 – Conservation, Protection and enhancement of Existing Natural Features

- 6.32 This policy seeks to protect important features that provide habitats or distinctive landscape features such as trees and hedgerows. It notes that proposals should protect existing features and provide new landscape works to integrate the development into the existing context.

Policy DM8 – Planning for More Sustainable Travel

- 6.33 This policy aims to improve transport choices for people so that there is greater access to the use of more sustainable methods of travel. This also requires new development to accommodate measures for highway safety and to encourage cycling, walking and use of public transport.

Policy DM10 – Pollution

- 6.34 Development should not result in a breach of national air quality standards. Lighting installed externally on developments should be of the minimum level of illumination for operations and security and light levels

should not have a significant impact on Langstone Harbour. The policy also states that noise levels produced on site should not impact on the health of nearby occupiers or residents.

Policy DM12 – Mitigating the Impacts of Travel

- 6.35 Policy DM12 aims to ensure that any additional traffic generated by new development will be assessed and any impacts mitigated. This policy also notes that Travel Plans will need to be submitted to accompany applications for new development.

Policy DM14 – Car and Cycle Parking on Development (excluding residential)

- 6.36 Policy DM14 notes that appropriate car, motor cycle and cycle parking provision should be provided for new development in accordance with relevant standards.

Policy DM16 – Freight Transport

- 6.37 This policy has the objective of ensuring that freight movements associated with new development will not impact on residential amenity and that proposals which will require freight movements are well located to the strategic highway network such that routes to major routes will not pass more sensitive locations such as residential areas.

Site Allocations Plan (2014)

Policy AL2 – Urban Area Boundaries and Undeveloped Gaps Between Settlements

- 6.38 This policy seeks to protect the character of rural settlements between the Borough's main towns and therefore restricts larger developments outside urban boundaries. The site is situated within the urban boundary that surrounds Havant and Bedhampton.

Policy AL5 – Cross-Borough Bus Rapid Transit

- 6.39 The Borough intends to launch a new bus route connecting Waterlooville with Havant and thereby linking both new and existing homes, jobs and community facilities between the Borough's two main urban centres. The indicative route for this service loops around the site along the northern, western and southern boundaries of the site.

Policy AL7 – Hermitage Stream

- 6.40 The Borough is working with other agencies and organisations to enhance the natural setting of the Hermitage Stream, including improvements to both the channel and adjacent land. The stream runs along the eastern boundary of the site and hence development should not hinder opportunities to enhance the stream's setting.

Policy HB2 – Havant and Bedworth Employment Allocations

- 6.41 The Borough has a list of sites which have the potential to be brought forward for employment development. The site is included on this list and is referred to as 'Brockhampton West' (BD11). Measuring 9.41ha, the site is identified as having the potential to bring forward 23,400 sqm of floorspace. It is also noted that the floorspace figures given for each site are indicative and that permission will be granted where proposals are 'broadly consistent' with these figures.

Policy BD11 – Site Specific Development Requirements

- 6.42 This policy refers specifically to Brockhampton West and outlines the requirements for development at the site. The policy notes that the site shall be brought forward for manufacturing and/or warehousing uses and a number of technical reports and surveys that will be needed to inform any development proposals, and which should support any planning application. It is stated that access should be taken from Harts Farm Way and that particular attention will need to be paid to matters of ground contamination and potential impacts upon any Brent Goose habitat.

Policy DM17 – Contaminated Land

The Council's Development Management Policies understand that development may need to occur on contaminated land but only where the site is properly investigated for potential sources of contamination and suitable mitigation measures are proposed. Where there is potential risk of contamination to receptors, appropriate remediation works will be required.

Policy DM23 – Sites for Brent Geese and Waders

- 6.43 This policy protects habitats for Brent Geese and/or waders, requiring proposals to demonstrate levels of impact including tests of the Habitats Regulations. Where a negative impact cannot be avoided, replacement feeding/roosting habitats must be provided. Part of the Brockhampton West site is identified as being a habitat for Brent Geese.

Emerging Havant Borough Local Plan 2036 – Submission Version*Policy DR1 – Delivering Sustainable Development*

- 6.44 This policy outlines that the Council is 'open for business' and has a commitment to bring forward 96,739 net sqm of employment floorspace across the Borough between 2016 and 2036.

Policy IN3 – Transport and Parking

- 6.45 Development proposals are considered to be acceptable where access onto the site is safe for both pedestrians and all types of vehicle. The policy also encourages developments to be supported by sustainable modes of transport as well as stating that transport infrastructure on the site should be adequate and sufficient to meet the objectives of the proposal.

Policy E1 – High Quality Design

- 6.46 Policy E1 requires new development to be of a high quality that responds to the site's context and brings forward a positive relationship between the building and its natural and built surroundings.

Policy E7 - Hermitage Stream

- 6.47 The Hermitage Stream is located to the east of the Brockhampton West site and this policy notes that development should not impact on the channel or the setting of the stream and that the Council remain open to opportunities to enhance the stream. Furthermore, development should not hinder possible stream maintenance.

Policy E12 – Efficient Use of Resources and Low Carbon Design

- 6.48 For non-residential development, the Council encourage development to follow the principles of low carbon design including, where possible, the reuse of materials. Developments should also take into consideration "solar gain, natural ventilation or ventilation with heat recovery, fabric performance and Passivhaus principles into the layout and design". Buildings on the site should also minimise the emission of greenhouse gases while seeking to enhance energy efficiency. The use of district heat or combined heat and power (CHP or CCHP) are also encouraged and the building should achieve a BREEAM level of 'Excellent'.

Policy E13 – Historic Environment and Heritage Assets

- 6.49 This policy states that proposals should sustain, and where possible, enhance the significance of heritage assets.

Policy E17 – Solent Wader and Brent Geese feeding and roosting sites

- 6.50 The Council are committed to the protection of Brent Geese and their habitats, meaning that applications on such sites where Brent Geese could be affected, will be assessed in accordance with the appropriate regulations. Such applications therefore require the submission of a Habitats Regulation Assessment and, if necessary, an Appropriate Assessment.
- 6.51 The site is designated as a Secondary Support Area for Brent Geese, meaning that development on the site must provide mitigation in the form of a similar replacement habitat on or surrounding the site, in accordance with a Habitat Management and Monitoring Plan. If that is not possible, then there is provision to agree a financial contribution to mitigate the loss of the habitat.

Policy E18 Trees, hedgerows and woodland

- 6.52 This policy states that developments should integrate with their natural surroundings and proposals should conserve, and where possible, enhance existing trees, hedgerows and woodland on the site. The

policy also requires developments to protect trees and hedgerows including their roots throughout the lifetime of the development, especially during construction phases.

Policy E19 – Managing flood risk in new development

- 6.53 In terms of submission requirements, developments must be compliant with national planning policies. Consideration must also be taken for long-term flood risk and any measures to prevent flooding of the site must be appropriate for the natural and built context of the local area. Where necessary, safety procedures should be in place in the event of flooding and contributions may also need to be made to support flood alleviation scheme(s).

Policy E22 – Amenity and Pollution

- 6.54 This policy concerns all types of pollution generally and seeks to ensure that neighbouring amenity is not put at significant risk by noise, light and air pollution generated on sites. The policy adds that mitigation measures will be required where pollution exceeds acceptable levels.

Policy E23 – Air Quality

- 6.55 The policy requires that major developments make appropriate offsetting of emissions in accordance with the scale of the development. Developments should not lead to a significant deterioration in local air quality and proposals should also take steps to mitigate air pollution.

Policy E24 – Contamination

- 6.56 With regards to contamination and ground conditions, the policy requires that development is brought forward on land where there is no identified risk of contamination. Where that cannot be achieved, assessments should be made to understand contamination sources both on and off the site and developments proposals will only be acceptable if the impact on potential receptors can be appropriately mitigated.

Policy C10 – Brockhampton West

- 6.57 The Emerging Local Plan Regulation 19 version, which includes recent July 2020 changes, refers to the *Business Needs, Site Assessment and Employment Land Study*, which suggest that 86,919 sqm of employment floorspace should be provided throughout the plan period. The Emerging Local Plan puts forward plans to provide 113,770 sqm of employment floorspace (Classes B1, B2 and B8) across the Borough, to ensure that employment needs can be met over the period up to 2037 and to allow for flexibility in the supply of new sites and premises for business.
- 6.58 The Emerging Local Plan Regulation 19 version, states that the Brockhampton West site should accommodate about 20,000 sqm of development across uses classes B1, B2 and B8. The policy also lists the following reports that would need to be submitted with an application at Brockhampton West:

- Transport Assessment and Travel Plan.
- Environmental Statement if required;
- Ecological Assessment;
- Contaminated Land Investigation Report to include gas monitoring;
- Air Quality Assessment;
- Noise Assessment;
- Landscape and Visual Impact Assessment;
- Tree Survey and Arboricultural Implications Appraisal;
- Flood Risk Assessment;
- Drainage Strategy;

6.59 It is also noted that development should mitigate impact on Brent Goose habitats prior to development as well as providing support for the Broadmarsh Coastal Park. The draft policy also seeks to ensure that any proposal does not hinder the operation of Bedhampton Aggregates Wharf for aggregates processing.

6.60 Sensitive design is also required on the site to take existing landscape features into account with consideration of views, including vistas from Langstone Harbour.

Opportunity Havant Regeneration Strategy (2018 – 2036)

6.61 Brockhampton West is allocated as a 'Strategic Employment Site' in the strategy and it is stated that the site is suited for 'last mile delivery', owing to the site's close proximity to the strategic road network.

7 PLANNING APPRAISAL

- 7.1 In line with Paragraph 7 of the National Planning Policy Framework, the proposals seek to contribute to the sustainable development of Havant.
- 7.2 This proposal represents an opportunity to create a high-quality sustainable development to suit the needs of future occupiers and meet market demand. The proposed development will make efficient and effective use of the site.
- 7.3 This section therefore seeks to identify the key issues associated with the development of this site.

Principle of Development

- 7.4 The site is allocated for employment use in both the adopted Development Plan and emerging Local Plan, the principle of developing this site for uses within Class E (light industry), B2 and B8 is therefore considered to be acceptable.
- 7.5 Respectively, the adopted Development Plan and emerging Local Plan suggests that 23,400 and 20,000 sq m of floorspace can be developed at the site, but that this is not a definitive maximum capacity of the site. The adopted Plan notes that the floorspace is indicative only whilst the emerging allocation states that 'about' 20,000 sq m shall be provided. Flexibility is therefore provided to secure a higher amount of floorspace at the site, as long as development will be consistent with the other policies of the policy hierarchy and that any impacts can be satisfactorily mitigated.
- 7.6 The proposed development is for up to 29,000 sq m of floorspace, but as noted above a higher quantum of development would still be compliant with the allocation, subject to detailed considerations to be addressed in any planning application. The sections below consider the other requirements of the policy hierarchy, identify any impacts and demonstrate how the proposed development would be consistent with adopted policy objectives.

Minerals and Waste

- 7.7 The adopted Waste and Minerals Plan identifies that the proposal site is within a mineral safeguarding area and is close to the Bedhampton Wharf Aggregates site. Consideration has been given to the potential for mineral extraction at the site and also whether the development would have any impact on the nearby wharf area.
- 7.8 The site is characterised by landfill material and made ground. Any mineral deposits would therefore be at a relatively low level and the process of extracting them would require the removal of the landfill

material. The extraction of any deposits is therefore not seen as feasible or desirable so that works at the site involving movement of the landfill can be kept to a minimum.

- 7.9 The development site is relatively self-contained and with the exception of the proposed drainage outfall onto the Hermitage Stream, will be set back from the eastern site boundary by a significant distance. The development will have no material impact upon the Hermitage Stream and will not have any impact upon the operations of the wharf area. The development will increase traffic along Harts Farm Way, but the submitted Transport Assessment has assessed the impact of development and concluded that Harts Farm Way and the Teardrop junction will continue to have capacity and the development will have a negligible impact. Therefore, it is considered that the operation of the Wharf will remain unaffected.

Sustainable Development

- 7.10 The NPPF identifies that sustainable development should address three key issues relating to economic, environmental and social well-being. These three themes will be considered in the preparation of this proposal.
- 7.11 The site is a former area of landfill that has been left as an area of informal open space, so under the terms of the NPPF it would not necessarily comprise previously developed land, but it is underused and has no other classification as a public open space. The development proposal seeks to optimise the use of the land by developing it to provide modern employment premises, whilst seeking to retain as much of the existing mature tree planting around the perimeter as is feasible and providing a buffer to the Hermitage Stream to the east and the Broadmarsh Coastal Park to the south.

Economic Growth

- 7.12 Lambert Smith Hampton's (LSH) *Business Needs, Site Assessments and Employment Land Study* (2016), which forms part of the evidence base informing the Borough's Emerging Local Plan 2036, identifies the type of employment sites that need to come forward and states the following:

The demand characteristics looking ahead will predominantly require Grade A to B quality space, where units will offer modern, adaptable and efficient layouts, with most importantly good commercial vehicular access and parking, with compatible neighbouring uses, on well managed business estates.

- 7.13 The proposal is in line with the requirements stated by LSH. The development represents an opportunity to create a flexible, high-quality development on an allocated employment site to suit the needs of future occupiers and meet market demand. Brockhampton West is well-located near two major roads and will provide car and cycle parking spaces in line with local standards. The site is also immediately adjacent to existing employment sites to the west and Policy CS2 of the adopted Development Plan seeks to support

existing employment clusters and this proposal will increase the employment characteristics of this area in line with this policy objective.

- 7.14 The NPPF places significant emphasis on proposals that secure economic growth. The proposed development of this site, as set out within this application would therefore contribute to meeting this strategic aim of the NPPF.
- 7.15 Job creation will be crucial for Havant's economic recovery from the Covid-19 pandemic. The Solent Local Enterprise Partnership (LEP) have produced an *Economic Recovery Plan (2020)* for the sub-region which explains that the UK's coastal areas currently face some of the toughest economic challenges as a result of "*de-industrialisation, changes in tourism and globalisation*". On top of this, the report refers to research from the University of Southampton which states that coastal communities and specifically Havant, "*are likely to be the most affected economically by the lockdown measures*".
- 7.16 In the last year Havant has seen a rise in unemployment and of the eight Local Authorities which make up the Solent LEP, in July 2020, Havant had one of the highest proportions of workers furloughed (32%). The report adds that "*it will take at least three years to return to pre-Covid employment levels across the Solent, or four years in the case of Havant*". The LEP's report therefore suggests that areas such as Havant should be central to the Solent's recovery in the short and long-term.
- 7.17 The development has the potential to contribute to the creation of job opportunities that will speed up Havant's economic recovery from the pandemic. Guidance on employment density and the number of jobs that are generally supported by different forms of development is contained within the 3rd Edition of the Employment Densities Guide (GVA Grimley on behalf of the HCA, 2015). On the assumption that the site is brought into use for B8 purposes, this would support in the region of 335 FTE jobs (based on a density of 1 job per 70 sq m), whereas if the buildings were in use for B2 operations then some 652 FTE jobs would be supported (based on a density of 1 job per 36 sq m).
- 7.18 These figures do not include any job opportunities created during the construction phase or through indirect effects of the development arising within onward supply chains or through supporting local services.
- 7.19 From an economic perspective the development of this site will also provide an opportunity for existing businesses to expand within the Borough or even to relocate to Havant from elsewhere. The outline nature of this proposal offers the flexibility to accommodate a range of unit sizes to meet specific tenant requirements, some of which may be businesses unable to expand due to limited availability of units to meet their specific needs. All of these scenarios would be positive and support the local economy by ensuring that existing jobs remain within the Borough or through securing inward investment that creates new job opportunities.

- 7.20 The development of this site for employment purposes would therefore make a significant contribution to the local economy which would meet the objectives of the NPPF from both an economic and social perspective. Furthermore, it is recognised that the Council is 'open for business' and the development will be in accordance with Policies CS2 and CS3 of the Adopted Core Strategy as well as Policy DR1 of the Emerging Local Plan, providing employment floorspace to generate a significant number of jobs of varying skill levels.

Social

- 7.21 The site is currently an open space that is now in private ownership. The site has no designation as open space or playing fields, although it has been used informally as an open space. The site has been allocated for a number of years and is viewed as an important employment site, with the allocation maintained within the emerging Local Plan. The creation of jobs at the employment units will help to support the population of Havant by providing job opportunities and securing investment in the area.
- 7.22 Whilst the development of the site will inevitably lead to the change in character of the site from an open area of grassland and vegetation to a commercial development, there are many other areas of open space in the area so the development of this land will not lead to a deficiency in the amount of open space available in the area.
- 7.23 It is proposed that improvements to other areas of nearby open space, in the form of signage and the addition of benches etc, will help to improve facilities in these other areas of open space at the Broadmarsh Coastal Park to comply with the objectives of site-specific policies from the adopted and emerging plans.

Environmental

- 7.24 In environmental terms, the proposal would result in the re-use of land, formerly used as landfill, as part of a comprehensive proposal to secure the site's long-term future. The proposals to develop the site will be progressed under a detailed method statement to ensure that any contamination risks are taken into account. It is concluded in the submitted Environmental Risk Assessment, that the development will lead to a betterment of the situation by establishing a suitable impermeable layer over the former landfill site that will be better drained and following any required works to ensure that contaminant risks are minimised.
- 7.25 Where possible, the proposal will retain existing landscaping on the site, which will be supplemented by new areas of native planting to minimise impact on the surrounding context and sensitive areas, such as Langstone Harbour and Broadmarsh Coastal Park to the south. No impacts on the heritage impacts will arise from the development. In accordance with Policy E7 of the Emerging Local Plan, the development

will maintain the landscape setting of the stream and will not restrict its future maintenance or potential improvement in the future.

- 7.26 The potential impact of development on the nearby Langstone Harbour that is a SSSI, RAMSAR site and SPA has also been assessed. The various reports that support the application conclude that there will be no impacts on these designations as a result of this proposal.
- 7.27 Whilst the development will impact upon areas of habitat present on the existing site, these areas are not of such importance that they will have a significant adverse impact on the species that they provide support for and it is considered that these impacts can be appropriately mitigated through works on site or the use of planning obligations. A contribution for off site creation or improvement of Brent Goose habitat will be made to support this species in the area.
- 7.28 The Hermitage Stream runs along the eastern boundary of the site, and the proposed drainage for the site will discharge to this watercourse. This drainage solution comprises a sustainable solution and has been assessed to take the effects of climate change into account. The drainage system will be designed to ensure that the discharge is of a sufficient quality so that it won't impact the Hermitage Stream or Langstone Harbour as a habitat.
- 7.29 The proposed development will minimise light spill during its operation and the new employment premises at the site will be constructed to a minimum standard of BREEAM Very Good and incorporate renewable energy technology as well as energy and water efficiency measures.
- 7.30 This development therefore represents an opportunity to provide employment floorspace that will enable job creation and realise economic benefits in the Borough. The proposed development is in close proximity to where people live and accessible by sustainable modes of transport, meaning that the proposal's impact upon the environment will be minimised. Existing landscape features are to be retained where possible and enhanced by additional landscape measures.
- 7.31 It is therefore considered that this proposal will meet the objectives of sustainable development as set out within the NPPF from an economic, social and environmental perspective.

Employment Land Supply and Demand Implications

- 7.32 Lambert Smith Hampton's (LSH) *Business Needs, Site Assessments and Employment Land Study (2016)* states that the employment market of the Borough is in an uncertain situation with a lack of employment units available to meet the modern needs of local, existing businesses as well as those beyond Havant's boundaries.

- 7.33 The study reports that manufacturing, which has been typical of the borough's economy and is identified as a "*sector worth focusing on*", has been susceptible to decline. This is reiterated in LSH's subsequent Employment Land Review (2020) for the Borough, which states (paragraph 3) that the "*supply of industrial premises continues to be suppressed*". As such, there is a need to provide more modern industrial premises in the Borough in order to attract businesses and help support manufacturing in Havant.
- 7.34 LSH also encourage the release of land for distribution purposes, stating that such uses have the potential to create as many jobs as other employment uses. The study also explains that the logistics sector can provide a wide variety of jobs, ranging from managerial and administrative positions to unskilled roles.
- 7.35 The provision of B8 floorspace is also supported by GL Hearn's *Economic and Employment Land Evidence Base Paper (2016)*, which focuses on the Solent sub-region and states that demand for warehouse floorspace is set to rise, noting the "*growth in warehousing and postal activities*" as well as retailers' increasing need for distribution floorspace. The Covid-19 Economic Recovery Plan produced by the Solent LEP adds that logistics can play a key role in the sub-region's "green recovery" from the pandemic.
- 7.36 The consensus across the economic evidence base informing Havant's emerging Local Plan is the need to provide flexible employment space supporting use classes E (light industry), B2 and B8. LSH's *Business Needs, Site Assessments and Employment Land Study (2016)* and *Employment Land Review (2020)* identify an overall net need of 55,000 sqm of mixed-use employment floorspace for the local plan period 2016-2036 and notes that the flexibility of use classes will demonstrate strong "*viability and marketability*". The proposal to provide up to 29,000 sqm of flexible employment space will therefore contribute significantly towards meeting this target and help to provide a robust and flexible source of high-quality employment land.
- 7.37 The NPPF is clear in stating that the planning system should be responsive in meeting demand and providing the industrial areas required. The redevelopment of this site would therefore address the needs addressed above and this proposal would help to meet this Government objective.
- 7.38 Havant's Regeneration Strategy (2018-2036) considers the economic challenges facing the Borough and firstly states that job density in Havant is well below that of the South East and the national average. The Strategy's suggested action for combatting this issue is to promote inward investment into 'Strategic Employment Sites', including Brockhampton West, helping to create a significant number of local jobs.
- 7.39 In order to secure such inward investment, the GL Hearn and LSH reports conclude that a sufficient pipeline of quality employment land is required to ensure that Havant remains competitive and can support business growth.

- 7.40 The Strategy also identifies that out-commuting is a problem for the Borough, which is neither environmentally friendly nor supportive of the local economy. It is stated that the Borough has an unsustainable net out-commuting level of 8,916 workers and it is therefore recommended that the Borough create more employment opportunities locally to discourage travelling outside Havant for work. The Regeneration Strategy also refers to Brockhampton West specifically and notes that the site is ideal for supporting the growth of 'Last Mile Delivery' in the Borough.
- 7.41 A supporting letter has been prepared by DTRE, who are leading advisors in Industrial and Logistics Development, to provide expert insight into the market for new employment premises in Havant. The letter illustrates a similar picture outlined by the Economic Evidence Base which informed Havant's emerging Local Plan. Much like the evidence base, DTRE's letter highlights the critical need for employment floorspace in the Borough and, similar to GL Hearn's (2016) assessment, recognises that warehouse activities will only rise as shopping patterns continue to move away from the high street.
- 7.42 This is evidenced through the national take-up rate for logistics and warehouse floorspace that has increased significantly over the last few years. DTRE's letter goes further in identifying that the supply of warehouse floorspace in Havant is insufficient and warns that the continued lack of supply is likely to force investors to look elsewhere, which would be contrary to the objectives of the Havant Regeneration Strategy to encourage 'inward investment'. It is noted by DTRE that occupiers are already discounting Havant as a location for new premises due to the lack of suitable sites, even though it is ideally placed to meet their locational requirements and to benefit from inward investment.
- 7.43 DTRE identify that the Brockhampton West site can form a high-quality employment location as a result of the following characteristics:
- i. Its ability to accommodate large premises of up to 29,000 sq m with clear internal heights of up to 15 metres;
 - ii. The ability to operate 24/7;
 - iii. Its excellent access to the strategic road network via the A27 and A3(M); and
 - iv. Proximity to a population catchment with good access to provide a workforce for businesses at the site.
- 7.44 DTRE's letter shares the view of the Regeneration Strategy and Local Plan in recognising Brockhampton West's potential as a high-quality employment site to deliver high-quality premises that are in demand from occupiers. The site is well-connected and has the potential to deliver the key requirements to meet modern business needs.
- 7.45 The Council's Regeneration Strategy, evidence base and the applicant's own advisers all concur that the applicant site has the characteristics to form a high-quality employment location and that there is a need to provide modern premises to meet the needs of business and secure inward investment into the

Borough. There is therefore a need for this development to come forward and, given the lack of available high quality locations, best use should be made of the site in meeting Council objectives and supporting economic growth.

Layout and Design

- 7.46 Detailed consideration of the design of the development is included within the Design and Access Statement that accompanies this proposal.
- 7.47 Units will be set back from the site's southern boundary, with the majority of car parking spaces situated to the front of feature elevations containing office floorspace. Service yards will either face into the development or towards the southern boundary of the site, but will be screened by bunds and landscaping.
- 7.48 Due to the site's historic use for landfilling, ground levels on the site are uneven. It is therefore proposed that substantial groundworks are undertaken to create a level plateau for development and to accommodate suitable gradients for vehicular access onto the site from Harts Farm Way, while respecting sufficient clearance underneath the existing electricity lines.
- 7.49 The elevated areas of landfill on the eastern part of the site will be moved as part of the cut and fill approach. Some of the surplus material from these earth movements, where it is appropriate for re-use, will be used to create bunds around the site that can then be used for additional soft landscaping to screen new development. These bunds are identified on the illustrative layouts.
- 7.50 A secondary access from Harts Farm Way, further west of the main service yard access is indicated to provide access to the car parking area to the far west of the site.
- 7.51 Depending on the layout plan, car parking provision will adjust accordingly to meet adopted standards. The illustrative layouts show parking accommodated to meet the relevant standard for B8 use at the site. It is considered that sufficient car parking can be accommodated for B1c/B2 uses by accommodating more car parking within other parts of the site (e.g. within the service yard), as these uses would have a lower requirement for loading doors and HGV parking spaces, providing more space to accommodate car parking.
- 7.52 In accordance with local standards, a suitable number of spaces would also be provided for both disabled users and cyclists.
- 7.53 Where possible, the mature vegetation boundary which surrounds the site will be retained and opportunities taken to provide further soft landscaping on the site.

- 7.54 The three different layouts demonstrate the same principles with regards to retaining landscape features, providing areas for bunding and the creation of vehicular access points from Harts Farm Way.
- 7.55 Overall, the design of the development at Brockhampton West has taken into account both Policy CS16 of the Adopted Core Strategy and Policy E1 of the Emerging Local Plan to propose a development that is of high-quality.

Air Quality

- 7.56 The site is not located within an Air Quality Management Area, but an assessment has been undertaken by Delta Simons to consider the impact of the development upon the local area. The Air Quality Assessment submitted with this application assesses both the construction stage of the development and the operational phase and also takes the surrounding habitats and designations that cover Langstone Harbour into account.
- 7.57 The assessment confirms that the main impact arising from the development will be the potential dispersal of dust during the construction phase, but identifies measures that can be used during this phase of the development to mitigate any impacts. The measures identified can be incorporated into a construction management plan to ensure that localised impacts can be mitigated.
- 7.58 The potential impact arising during the operational phase have been considered that would primarily arise from the traffic serving the site. Data was analysed of the proposed traffic movements associated with the operational phase of the development and it was concluded that this would have a negligible impact in relation to air quality and that no mitigation was required. A Framework Travel Plan has been prepared that will be used by future occupiers to guide detailed Travel Plans to encourage the use of more sustainable modes of transport for workers employed at the site to reduce the number of private vehicle journeys.
- 7.59 In accordance with the Air Quality Planning Guidance, produced by the EPUK and IAQM, the assessment concludes that the development's impact upon the SSSI and ecological receptors in the vicinity on the site would not be significant.
- 7.60 It is therefore concluded that the development will be compliant with Policy DM10 of the Adopted Core Strategy and Policy E23 of the Emerging Local Plan and will have no material impact on local air quality.

Acoustics

- 7.61 The site is not located in an area that would be sensitive to noise as there were no sensitive receptors adjacent to the site, therefore this application is not accompanied by an acoustic assessment. It was

agreed with planning officers, in conjunction with the Borough's Environmental Health team, that a noise assessment was not required to support this application. The site is directly adjacent to the A27, which is a busy trunk road, and a source of noise that elevates background noise levels, such that any operational noise is unlikely to be significant.

- 7.62 The site is adjacent to areas that are identified as habitat for wintering birds and the impact of potential noise arising from the development at the site has been considered in the ecology report that supports the application. It was determined that the impact of noise arising from the development was not likely to affect any nearby habitats.
- 7.63 As the development is not expected to impact on local amenity or any sensitive receptor, the development is therefore in accordance with Policy DM10 of the Adopted Core Strategy and Policy E22 of the Emerging Local Plan.

Ecology

- 7.64 An Ecology Report has been prepared by Applied Ecology following a range of surveys that were undertaken at the site over the course of 2020, with wintering bird surveys being undertaken over the current winter period.
- 7.65 The report concludes that there is no statutory or non-statutory wildlife designation on the site nor is there any ancient woodland that needs to be taken into account.
- 7.66 The report acknowledges that the site is in close proximity to SSSI and Ramsar sites to the south, which make up Chichester and Langstone Harbour Special Protection Area (SPA) and also assesses the likely impact arising from the development on these designations.
- 7.67 Both the Adopted and Draft Local Plan note that Brent Geese, a protected species, have inhabited the site at some point and the site is identified as a 'low use' site within the Solent Wader and Brent Geese strategy. The report assesses the likely presence of Brent Geese on the site confirming that their last known use was on the western half of the site in the winter of 2007-2008. Since then, there has been no record of species using the site and this is likely to be because the site's character has changed so that it does not represent suitable habitat for brent geese.
- 7.68 Brent Geese prefer shorter, more maintained grassland and the grassland is now overgrown, showing more scrubland and ruderal qualities. The site boundary is also more extensive with tree planting around the perimeter of the site, meaning that sight lines to see potential predators for Brent Geese have been removed. The site is also used by dog walkers, creating recreational disturbance which discourages Brent Geese. The report concludes that the site is not an important habitat for Brent Geese and conditions on the site are no longer suited to their habitation.

- 7.69 The ecology report also considers the impact of the development under the terms of the Habitats Regulation Assessment and it was concluded that there would be no impact upon the Special Protection Area arising from the development.
- 7.70 Under the terms of the Solent Waders and Brent Goose Mitigation Strategy, it is proposed that a financial contribution is made to secure the provision of new or enhanced habitat for Brent Goose in an off-site location. Whilst the Solent Wader Strategy identifies that the area of low use habitat at the site is 5.16 Ha in size, upon closer inspection, this area includes parts of Harts Farm Way and other highway infrastructure around the Teardrop Junction.
- 7.71 An overlay has been prepared of the application site and the low use designation H08 and this identifies that the area of land within the red line application boundary, is 4.47 Ha in size and this is included at Appendix A. To calculate the financial contribution required as mitigation this has been rounded up to 4.5Ha and the applicant has confirmed within the Heads of Terms document for the S106 that they have committed to make this financial contribution if planning permission is granted.
- 7.72 The report identifies the presence of various species on the site, including a population of slow worms, and makes appropriate recommendations to ensure that the site will continue to protect wildlife during the construction phase and support biodiversity during the operational phase. Recommendations include the provision of bat and bird boxes around the site and the landscape masterplan has been prepared to provide suitable areas of habitat.
- 7.73 The report also recommends implementing a sensitive lighting scheme to reduce light spill on landscaped areas of the site to minimise any impact on wildlife. A lighting strategy has been prepared to support the development and illustrates that a suitable scheme can be accommodated at the site.
- 7.74 In addition, a Reptile Mitigation Strategy will be provided prior to site clearance to avoid any harm to the slow worms on site. The strategy will detail the approach to relocating slow worms to a southern area of the site' which will be protected by temporary fencing until the construction phase has finished. The area will be suitable for reptile habitation and will then be retained as reptile habitat in the completed development.
- 7.75 On the basis of the Ecological Report, it is considered that the development will not result in any significant impacts on wildlife and habitats at Brockhampton West which cannot be suitably mitigated. The development is therefore in compliance with Policy W&BG5 of the Solent Waders and Brent Geese Strategy, Policy DM23 of the Borough's Adopted Site Allocations Plan, Policy E17 of the Draft Local Plan, which relate to the protection of Brent Geese sites as well as Policies CS11 and DM8 of the Adopted Development Plan which relate to the protection of Havant's natural environment.

Energy and Sustainability

- 7.76 An Energy Statement has been provided to outline how sustainability and energy efficiency issues have been taken into account on the site.
- 7.77 The development will utilise features of passive and low energy design including the installation of high-performance glazing, construction of an enhanced building fabric, as well as ensuring the building is of low air leakage. In terms of lighting, it is also proposed that low energy LEDs will be used and automatic control lighting fitted, with occupancy and daylight dimming controls.
- 7.78 Renewable energy technologies will also be used in the development in the form of air source heat pumps as well as Photovoltaic cells to be mounted on the roof of the units. Given the nature of the site and the proposed operations that are anticipated within the units, these are the only renewable energy technologies that are considered appropriate or feasible to serve the development.
- 7.79 The Energy Statement envisions that, together, the combination of renewable energy technologies and passive and low energy design features will secure a 33% reduction in the development's annual CO₂ emissions. These design considerations will also help achieve a high BREEAM Ene01 score of 5.
- 7.80 A BREEAM pre-assessment for the illustrative 3-unit scheme has also been prepared and this demonstrates that a rating of Very Good can be achieved and this will be the minimum target for the final units to be developed at the site once the exact configuration and layout has been confirmed.
- 7.81 It is therefore demonstrated that through the use of passive and low energy design principles as well as renewable technologies, the development is in line with Policy CS14 of the Adopted Core Strategy and Policy E12 of the Emerging Local Plan.

Flood Risk and Drainage

- 7.82 The Flood Risk Assessment accompanying this application assesses the existing and proposed surface and foul water drainage for the site. The site is within Flood Zone 1 and is elevated from the surrounding area, so it is therefore at very low risk of flooding from surface water, nearby rivers and watercourses or reservoirs. The proposed use for employment operations is also considered to be a less sensitive use, so in terms of flood risk, the development is therefore appropriately located and in accordance with Policy CS15 of the Adopted Core Strategy.
- 7.83 An illustrative drainage design has been prepared that relates to the illustrative 3-unit layout drawing to demonstrate the principles of the drainage system that will be adopted at the site once the final layout has been confirmed.

- 7.84 The drainage strategy considers the most suitable approach to dealing with surface water run off at the site, confirming that with appropriate design, the development will not lead to any prospective contamination issues. It is proposed to provide a controlled discharge into Langstone Harbour via the Hermitage Stream. As the site is a former landfill, certain SUDS measures such as the use of infiltration or above ground drainage features such as swales, are not appropriate.
- 7.85 The provision of the drainage outfall to the Hermitage Stream will require some limited works across the existing woodland area and the associated footpath that runs alongside the watercourse. These works have been taken into account in the landscape design and have also been considered within the Landscape and Visual Impact Assessment. In respect of the duration of these works, it is considered that the works would require the temporary diversion of the footpath for up to a week. The land would then be restored with appropriate surfacing and landscaping with details to be agreed with the Planning Authority and other relevant stakeholders.
- 7.86 The Flood Risk Assessment takes into account the effects of climate change and confirms that the development would not result in an increase in flood risk from any sources both on the site or in the surrounding area. Furthermore, it is stated that the drainage strategy proposed is in accordance with local and national standards and will not increase the risk of flooding on or off the site.
- 7.87 The Flood risk Assessment and drainage strategy for the site confirm that no works in respect of flood risk or drainage are required outside of the application boundary.
- 7.88 Overall, the development is considered acceptable from a flood risk and drainage perspective and thus compliant with national planning policy as well as Policy CS15 of the Adopted Core Strategy and Policy E19 of the Emerging Local Plan.

Ground Conditions and Contamination

- 7.89 Policy BD11 of the adopted Site Allocations Plan addresses Brockhampton West specifically and explains that development proposals must take into consideration the site's ground conditions. Consequently, a Preliminary Geo-Environmental Risk Assessment has been prepared by Delta Simons to assess the ground conditions at the site and likelihood of any contamination that may need to be considered during construction and operation works. This preliminary assessment is accompanied by a previous report of intrusive investigations at the site prepared by White Young Green.
- 7.90 The preparation of the report has been informed through correspondence with the contaminated land teams at the Council and also the Environment Agency, both of whom will need to monitor development works on the site to ensure that appropriate measures are adopted for the construction phase to minimise any risks associated with progressing the development.

- 7.91 The Delta Simons report identifies the site's historic use as landfill as a potential source of contamination. It is understood that the landfill largely contains domestic waste and other material from road construction. The assessment also recognises the importance of dealing with contaminants carefully due to the site's close proximity to the Hermitage Stream and Langstone Harbour, which is covered by environmental designations.
- 7.92 The assessment states that there is a moderate to high risk of contamination of soil and groundwater as well as the release of hazardous ground gas at the site. Furthermore, it is also noted that asbestos could be present within landfill waste at the site and explains that there is also the possibility that there are other geo-technical development risks to take into consideration that will need to be considered in terms of the foundation design to make sure that a comprehensive approach is taken in respect of ground conditions and potential contamination risks.
- 7.93 As a result of changes to the waste permitting scheme that have recently been introduced by the Environment Agency, areas of waste at the site affected by site levelling will need to be removed from the site for deposit at an alternative location that is licensed to deal with waste. The waste that is retained on site will then be capped to an approved specification to ensure that surface water run off does not infiltrate the retained material at the site, thereby minimising future contamination risks.
- 7.94 Recommendations are therefore made to ensure that risk associated with contamination is minimised, including additional intrusive ground investigations prior to any construction works taking place. These investigations will provide a better understanding of the extent of made ground, the nature of the pollutants and the risk of contamination to ecological receptors, human health and future occupiers of the development. Such investigations will inform the design of foundations and engineering solutions.
- 7.95 The report concludes that following the recommendations outlined within the report, no significant impacts are likely as a result of the development. It is also stated that the works on site will seek to deal with any existing contamination issues of concern and leave the site in a better position than its current state as the works and any required remediation will be undertaken to current standards.
- 7.96 Upon implementation of the recommendations and further work identified within the Preliminary Risk Assessment, it is concluded that the impact of the development will result in a betterment of the current situation and that the site will be suitable for the proposed employment use and is therefore in line with the objectives of Policy DM17 of the Adopted Site Allocations Document and Policy E24 of the Emerging Local Plan.

Heritage

- 7.97 While the site is within close proximity to heritage assets including the Old Bedhampton conservation area and a number of Listed Buildings within this, Policy C10 of the Emerging Local Plan, relating to Brockhampton West, does not recognise the need to submit a Heritage Statement in support of an application on the site. The site is generally self-contained and well screened by existing vegetation around the site boundary. The A27 which separates the site from nearby heritage assets is also lined on both sides by a dense boundary of trees and hedges which restricts inter-visibility between the site and land uses to the north of the A27.
- 7.98 Given that the site is a former landfill site then it is considered to have no archaeological potential and an archaeology assessment has not been undertaken to support the development. The County Archaeologist confirmed that due to the landfill use, that there would be no archaeological issues in relation to future development of the site.
- 7.99 Following the conclusion of the Landscape and Visual Impact Assessment that supports this application, it has become apparent that limited views of the development may be apparent from Lower Road, which is approximately 50 metres from the boundary of the conservation area.
- 7.100 In order to ensure that a robust assessment of the proposed development has been undertaken and to ensure that the objectives of protecting heritage assets as set out in the NPPF have been complied with, a Built Heritage Assessment has been prepared by RPS to support this application.
- 7.101 This report concludes that development will not be visible from the Old Bedhampton Conservation Area and that there will be no impact on any nearby heritage assets. Therefore the development is in compliance with Policy CS11 of the Adopted Core Strategy and Policy E13 of the Emerging Local Plan.

Lighting

- 7.102 In accordance with Policy DM10 of Havant's Adopted Local Plan, a Lighting Assessment has been submitted with this application to demonstrate that a suitable lighting scheme can be prepared to minimise any harmful effects of light generated by the development. It is proposed that occupiers will have the ability to operate 24/7 at the site, and to comply with Health and Safety legislation and best practice for working environments, lighting of external areas will be needed.
- 7.103 The application is made in outline, so a final layout is not yet available, however for assessment purposes, a lighting scheme has been prepared based on the illustrative 3-unit layout. The lighting scheme is based on the required lux levels for various parts of the site to ensure that appropriate illumination is provided for roads and operational areas such as service yards and loading areas.

- 7.104 The design of the site takes into account areas of the site which are sensitive to continued or high levels of light exposure, including the surrounding vegetation boundary which is likely to support local wildlife. The proposed light sources are designed and orientated to minimise light spill from the operational areas of the site onto the vegetation boundary while the proposed bunds around the perimeter of the site will also help to block light pollution.
- 7.105 It is proposed that the principles shown on the submitted lighting assessment will be used to inform the finalised lighting scheme for the confirmed layout of the site. On this basis it is considered that a suitable lighting scheme can be provided for the site that will minimise light spill but still ensure that operational requirements for any future occupiers are met, thereby according with Policy DM10 of the Adopted Development Plan and Policy E22 of the Emerging Local Plan.

Transport and Highways

- 7.106 A transport assessment has been prepared by Vectos to support this application following discussions with the Highway Authority and Highways England. The submitted assessment considers the impact of traffic generated by the employment use of the site and also reviews the surrounding infrastructure that serves the site to provide access from other modes of transport such as public transport, walking and cycling.
- 7.107 The site is located in close proximity to the strategic highway network and is bordered to the south by Harts Farm Way, which is a straight road meaning that vehicles travelling along this road have good visibility in both directions. There is an existing access from Harts Farm Way onto the site and it is proposed that this will be closed with a new access point created to the east to secure a suitable means of access for HGV's and car users. Modelling work has been undertaken of the surrounding highway network demonstrate the acceptability of an increase in vehicles using the road to access the site.
- 7.108 The final layout of the site is not yet known and will depend upon occupiers' requirements. The illustrative layouts show parking provision to meet the relevant standard for B8 use at the site. It is considered that sufficient car parking can be accommodated for light industrial (B1c/Class E) and B2 uses by accommodating the required level of car parking within other parts of the site (e.g. within the service yard), as these uses would have a lower requirement for loading doors and HGV parking spaces, providing more space to accommodate car parking. Final details will be agreed as part of any Reserved Matters submission.
- 7.109 Parking will also be available to bicycles, motorcycles and HGVs. A swept path analysis submitted with this application illustrates how HGVs will be able to use the site safely and efficiently. As such, it is considered that the development will be compliant with Policy DM14 of the Core Strategy, providing

suitable numbers of car and cycle parking spaces as well as Policy DM16, through enabling the movement of freight vehicles.

- 7.110 It is also significant to note that there is sufficient infrastructure to support access to the site via sustainable modes of transport including walking and cycling. Havant Footpath 30 bridges over the A27 and passes the site's eastern perimeter, linking the site with Bedhampton to the north. National Cycle Network Route 22 is shared with a pedestrian route and runs alongside Harts Farm Way, connecting the site with Havant town centre and railway station. In line with Policy DM8 of the Borough's Core Strategy, it is therefore considered that the development is suitably located to utilise sustainable modes of transport.
- 7.111 A Framework Travel Plan also supports this application and outlines the measures that will encourage employees to use more sustainable modes of transport. Future occupiers will however need to prepare individual plans for each of the proposed units.
- 7.112 Overall, it is considered that the site is well located and has the credentials to form a sustainable development that will not be completely reliant on private car usage. The assessment also concludes that there will be no significant impact upon the capacity of the local highway network and the development will comply with national policies as well as Policies DM8, DM14 and DM16 of the Adopted Core Strategy and Policy IN3 of the Emerging Local Plan,

Trees and Landscape

- 7.113 The development site is a vacant area covered in vegetation with tree planting around the perimeter with some trees within the site. The existing tree planting means that the site benefits from effective screening and the site is relatively self-contained, although there is greater visibility across the site from the western aspect adjacent to the teardrop junction and there are some breaks in the vegetation around the boundary that offer glimpse views into the such, such as where the existing access is located.
- 7.114 The site levels vary across the site, mainly rising from west to east before the levels then drop down towards the Hermitage Stream. The site is also raised in relation to the surrounding road infrastructure. The site allocation is for employment use and the Council vision as set out under their Regeneration Strategy is to accommodate large employment units on the site to meet demand from occupiers.
- 7.115 In order to develop the site to meet these objectives, the site will need to be regraded to achieve the levels required to accommodate site access roads, parking areas, service yards and the units themselves. As a result of these regrading works it will not be feasible to retain the trees within the middle of the site and many around the edges will also need to be felled to facilitate the development.

- 7.116 A pre-development tree survey and arboricultural impact assessment has been prepared to support the application. This survey identifies that there are no TPO's at the site and no trees are identified as Ancient or category A. In general terms, the trees present on site are young with nearly all being classified as Early Mature, as they have established since landfill activities at the site ceased. The tree survey submitted with this application states that these trees tend to be of low-moderate quality.
- 7.117 Along the eastern boundary of the site, a small number of trees will need to be felled to create an opening for a pipe to allow drainage off the site into Hermitage Stream. The tree survey states that this opening will not have a significant impact on public visual amenity and it is also considered that trees and shrubs will soon grow back in this area.
- 7.118 It will also be necessary for some trees to the south of the site to be removed to form the vehicular access onto the site and to provide an area for relocation of the slow worms. It is not however considered that the clearance of particular trees in these southern areas will not impact on the screening of the site.
- 7.119 As well as screening, retained trees along the perimeter of the site will continue to provide a corridor for local wildlife, helping to ensure that the development provides opportunities to preserve and enhance biodiversity. The areas of retained tree planting and new provision of landscape are illustrated on the landscape masterplan that will guide future development of the site. The loss of trees at the site is mitigated by the provision of areas of new tree planting, which will be of native species and in a manner that will allow them to establish at the site to reach maturity.
- 7.120 A landscape and visual impact assessment has been prepared by Pegasus to consider the impact of development in terms of visual amenity and landscape character. Sensitive viewpoints in the area around the site have been identified and agreed with the Planning Authority and wireline images and more detailed graphics for particular viewpoints have been prepared based on the illustrative development proposals to identify where the development may be visible from.
- 7.121 An assessment was then undertaken to identify the nature of any impacts arising from the construction of the development at the site.
- 7.122 It is acknowledged within the Landscape and Visual Impact Assessment that the development will have a visual impact as it is changing in character from a flat and vacant area of open land to a developed site that will accommodate employment premises. Immediate impacts have been identified during the construction stage of the development, albeit that this phase is temporary so any impact will be short lived. The development will also have greater visibility from the surrounding area at completion, before the proposed areas of landscape and tree planting around the site have fully matured.
- 7.123 The landscape proposals have been prepared to provide bunds along the western and southern boundaries of the site, which will then be planted with trees and other landscaping to provide screening of

the development to minimise the effects. Once the tree planting and landscape has established itself, which is at year 15 following completion of the development, it has been assessed that the visual impacts of the development will be minimised such that any effects will be negligible or at most there will be a minor impact.

- 7.124 Overall, it is therefore considered that with regards to trees, landscape and visual impact, the proposals are acceptable and will not result in any significant impacts. The proposals are therefore in accordance with Policies CS16 and DM8 of the Adopted Core Strategy as well as Policies E1 and E18 of the Emerging Local Plan.

8 SUMMARY

- 8.1 The site is allocated for employment use under both the adopted and draft Local Plan. The proposed development is for a site which has long been underutilised to provide a modern employment premises which will contribute towards economic development, job creation and support the growth of new or existing businesses in Havant.
- 8.2 A number of technical reports have been undertaken to consider detailed aspects of this proposal and these have identified any required mitigation measures. The recommendations of these reports do not identify any issues that would prevent the development of this site for the proposal as set out within the planning drawings.
- 8.3 This development represents an opportunity to create a high-quality, sustainable development to suit the needs of future occupiers and meet market demand. The proposed development will make efficient and effective use of an underutilised site.
- 8.4 It is therefore considered that this development accords with the policy provisions within the NPPF and both the adopted and emerging Development Plan and forms a sustainable form of development that will not give rise to any unacceptable impacts. Planning permission should therefore be granted without delay.

APPENDIX A

SUBJECT TO STATUTORY CONSENTS

SUBJECT TO SURVEY

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TITLE

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DRAWING

WINTERING BIRDS OVERLAY

CLIENT

DATE

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