

West:

To the west are a variety of commercial business premises fronting Southmoor Lane and Brookside Road. Further West is Budds Farm sewerage works.

North:

To the north of the site runs footpath 50 with the A27 west bound slipway from the Langstone roundabout and the A27 dual carriageway beyond. Footpath 51 runs north from the northeast corner of the site towards Havant Town Centre, Solent Road and Havant bus and train stations.

East:

To the east of the site is footpath 51 and the Langbrook River there are also trees to the south-east part of the site boundary. Beyond these features are a Premier Inn and the Langbrook Public House/Restaurant to the north-east of the application site. To the southern part of the eastern side of the site are residential properties in Brookmead Way.

2 Planning History

- 2.1 The application site has been subject to numerous planning and advertisement consent applications, the more significant/relevant applications are listed below:

92/50238/022 - Single storey extension to Building 24, undercroft area enlarged fire exit lobby/link from Building 26, new fascade to night security entrance, PERM,07/09/1992

92/50238/024 - Variation of condition 2 of P.P.18838/82 for 2,000,000sq.f of industrial/office floor space to extend time period for submission of reserved matters from 6 to 8 years., PERM,15/10/1992

93/50238/031 - Construction of new building for class B1 (business) use together with parking and service areas, access roads and landscaping(site area 3.32 hectares) , PERM,05/08/1994

94/50238/038 - Infill of building 25 undercroft area to provide additional floorspace, PERM,18/01/1995

94/50238/041 - Extension of existing car park (South) to provide approx. 250 replacement spaces, PERM,16/02/1995

96/50238/061 - Creation of new ditch and culverts for the purposes of diverting the existing water courses, including the construction of a new footbridge along the line of the existing footpath (No.49), PERM,06/11/1997

95/50238/044 - Extension of existing car park to provide approximately 216 new spaces., PERM,11/05/1995

95/50238/049 - Extension of existing car park (south) to provide 77 new spaces., ,05/09/1996

00/50238/068 - 1) Demolition of buildings (21 and part 24) on A27 frontage and redevelopment with DIY Retail Store (11,288 sq.m), Garden Centre (2,787 sq.m) External Trade Area (1,858 sq.m) and car parking (640 spaces), with vehicular access to Langstone Road (A3023) and Brookside Road (incorporating revised junction layout arrangements), new cycleway and landscaping. 2) Erection of 2 No. B1 Production Units (9, 290 sq.m) in south west corner with service access road, 310

parking spaces and landscaping.3) Demolition of building (16) and revised parking layout for remainder of site including landscaping. 4) Demolition of 4 dwellings (39a, 39b, 43 and 47 Brookside Road) (Re-Consultation), REF,16/07/2001

02/50238/076 - Demolition of four dwelling houses. New access road layout, including formation of new roundabout with Brookside Road and construction of car park adjacent to northern boundary with A27. PER, 21/01/2003

APP/10/00272 - Demolition of existing steel clad building and two portacabins to make way for a single storey timber framed building to house a 52 place nursery school., PERM,10/09/2010

APP/11/01297 - Variation of Condition No. 3 of Planning Permission APP/10/00272 relating to extending the childcare facilities to non LTP employees (using the access via the western access road)., PERM,05/12/2011

APP/11/01298 - Installation of 4No. roof mounted cooling units and chiller plant; extension at ground floor (level 1) to provide room for 2No. stand-by generators with attenuating exhaust baffles and louvred roof top air intake housing., PERM,04/10/2011

APP/14/00631 - Variation of Condition 1 of Planning Permission APP/11/01297 (which varied condition 3 of original Planning Permission APP/10/00272) to remove restriction on catchment area., PERM,17/10/2014

APP/15/00484 - Change of use from store to gym facility., PERM,09/07/2015

APP/15/01225 - Installation of 2No. roof mounted condenser units and associated chiller pipe work to support 2No. additional internal computer room air conditioning units., PERM,11/12/2015

APP/18/00018 - Change of use of site to Class B2 (engineering workshop with associated offices)., PERM,05/02/2018

GEN/19/00354 - EIA Screening Opinion - Erection of new industrial units and rationalisation of south car park, demolition of part of the northernmost building with new elevation on the remaining part of the building, new screen on adjacent building and extension to existing car park.- Not EIA development 29/05/19

APP/19/00297 - Proposed alteration to the existing east facing elevation to accommodate a new entrance threshold and associated external works., PERM,13/06/2019

GEN/19/00681 - Notification of application for listed building status, 19/08/2019

Officer Comment: This request in relation to Building 6000 has been considered by English Heritage who confirmed on the 3rd February 2020 the following:

We have taken into account all the representations made and completed our assessment of the building. Having considered our recommendation, the Secretary of State for Digital, Culture, Media and Sport has decided not to add the former IBM Building 6000, Langstone Technology Park, Havant to the List of Buildings of Special Architectural or Historic Interest.

Building 6000 is not therefore a Listed Building.

APP/19/00806 - Variation of Condition 2 of Planning Permission APP/19/00296 (Erection of a new building entrance structure, reception/lobby refurbishment and associated hard and soft landscaping works) to amend approved plans., PERM,09/10/2019

2.2 Applications for commercial development to the east of the site:

APP/14/01300 - Erection of four storey hotel (including restaurant for hotel guests only) with associated car parking and landscaping; and air conditioning units in compounds, with access from the private access road to Langstone Technology Park., PERM,26/05/2015

APP/15/00586 - Discharge of Condition No/s 5, 6, 7, 10, 12, 13, 14, 15, 16 and 18 of Planning Permission APP/14/01300., PERM,20/08/2015

APP/15/01266 - Erection of four storey hotel (including restaurant for hotel guests only) with associated car parking and landscaping; and air conditioning units in compounds, with access from the private access road to Langstone Technology Park. Request to Discharge Condition 19 of Planning Permission APP/14/01300 (04.11.15)., PERM,20/01/2016

2.3 In addition to the above planning history the following S52 Agreement has been considered in relation to this development:

A S52 Agreement dated the 9th November 1982 included the following provisions:

- 1. The measures referred to in clause 2 above shall be such as to ensure that between the hours of 7.15am and 9am not more than 250 employees vehicles per hour enter the access to the IBM Havant Plant from the southbound carriageway of Langstone Road and shall include without prejudice to the generality of the foregoing the issuing at any one time to not more than 500 employees of distinguishing stickers indicating that such employees are permitted to enter the access to the IBM plant from the southbound carriageway of Langstone Road.*
- 2. Only employees whose motor vehicles bear in a conspicuous position (which shall in the case of a four wheeled vehicle be the windscreen) the sticker referred to above shall be permitted to enter the IBM Havant Plant from the south bound carriageway of Langstone Road in a vehicle between the hours of 7.15 am and 9am and IBM shall maintain at its own expense such regulatory personnel as may be necessary to enforce this requirement.*

3 Proposal

3.1 Part-demolition of Building 1000 and associated works; the erection of new flexible use industrial units; and a new parking layout with associated works to layout and access and felling of two trees subject to a Tree Preservation Order (Norway Maples). Note – the trees were not confirmed as being TPO'd.

3.2 In broad terms the application comprises the following elements:

Part-demolition of the eastern two bays of Building 1000, the internal reconfiguration of bay 3 Building 1000 as offices and the erection of a new flank

wall on the new eastern elevation of the building;

The laying out of a new car parking area at raised level where bays 1 and 2 of Building 1000 are demolished;

The erection of a new wall to the northern edge of Building 4000, and screening on the roof to conceal the existing plant as a result of the part-demolition of Building 1000;

The erection of new flexible B1c, B2 and B8 use units, comprising approximately 13,476sqm of new floorspace within the South-West corner of the site with associated parking; and

The reconfiguration of the parking layout and the improvement of the landscape throughout the site.

4 Policy Considerations

National Planning Policy Framework

Havant Borough Council Borough Design Guide SPD December 2011

Havant Borough Council Parking SPD July 2016

Havant Borough Local Plan (Core Strategy) March 2011

CS11	(Protecting and Enhancing the Special Environment and Heritage of Havant Borough)
CS14	(Efficient Use of Resources)
CS15	(Flood and Coastal Erosion)
CS16	(High Quality Design)
CS17	(Concentration and Distribution of Development within the Urban Areas)
CS19	(Effective Provision of Infrastructure)
CS2	(Employment)
CS20	(Transport and Access Strategy)
CS21	(Developer Requirements)
CS8	(Community Safety)
DM10	(Pollution)
DM11	(Planning for More Sustainable Travel)
DM12	(Mitigating the Impacts of Travel)
DM14	(Car and Cycle Parking on Development (excluding residential))
DM8	(Conservation, Protection and Enhancement of Existing Natural Features)

Havant Borough Local Plan (Allocations) July 2014

DM17	(Contaminated Land)
DM20	(Historic Assets)
AL1	(Presumption in Favour of Sustainable Development)
DM18	(Protecting New Development from Pollution)
AL2	(Urban Area Boundaries and Undeveloped Gaps between Settlements)

Pre-Submission Havant Borough Local Plan 2036

DR1	(Delivery of Sustainable Development)
KP6	(Langstone Technology Park)
IN1	(Effective provision of Infrastructure)
IN2	(Improving Transport Infrastructure)
IN3	(Transport and Parking in new development)

IN4	(Access onto Classified Roads)
E1	(High Quality Design)
E2	(Health and Wellbeing)
E3	(Landscape and Settlement Boundaries)
E12	(Low Carbon Design)
E13	(Historic Environment and Historic Asset)
E14	(The Local Ecological Network)
E15	(Protected Species)
E18	(Trees, Hedgerows and Woodland)
E19	(Managing Flood risk in new development)
E20	(Drainage Infrastructure in new development)
E22	(Amenity and pollution)
E23	(Air Quality)
E24	(Contamination)
C1	(Protection of existing employment sites)

Listed Building Grade: Not applicable.

Conservation Area: Not applicable.

5 **Statutory and Non Statutory Consultations**

Arboriculturalist, Havant Borough Council

Final Comments:

Due to Covid 19 restrictions, the Tree Preservation Order objection has not been able to be dealt with in time and therefore the TPO has lapsed. My opinion remains the same in that the Norway Maples should be retained as there is no arboricultural justification for removing them. As per my previous comments on this, if a decision is made to grant permission because the need outweighs the loss of the trees, full details and the location of the replacement tree planting should be supplied for approval prior to commencement to mitigate for their loss.

A Silver Maple and two Ash were also protected by the Tree Preservation Order but have always been shown for retention so have no further comment on this.

Officer Comment: *A condition to require full replacement planting details is recommended.*

Further Comments:

I still cannot support the removal of the two Norway Maples as there is no Arboricultural justification for their removal. If a decision is made to grant permission, I have reviewed the replacement planting proposals and can confirm that the species selection is appropriate and full details should be supplied for approval prior to commencement.

Further Comments:

In order for me to comment fully I require an AIA, Method Statement and Tree Protection Plan. It is noted within the statement regarding tree removal, dated 2/8/19, that this is currently being prepared.

Further Comments:

Further to our conversation last week a tree preservation order has been made for Langstone Technology Park.

My comments on the application are as follows:

I object to the proposal to fell two category 'A' Norway Maples to the north of the Technology Park building. Also included within the Order are two Ash trees and a Silver Maple (however I note that they are to be retained). While there are a number of other trees shown to be removed, they are small heavily pruned trees typical of car park planting and not suitable to be retained by way of a Tree Preservation Order.

The layout should be revised to retain the Norway Maples.

Original Comments:

In order for me to comment fully I require an AIA, Method Statement and Tree Protection Plan. It is noted within the statement regarding tree removal, dated 2/8/19, that this is currently being prepared.

Building Control

No comments received

Community Infrastructure

CIL

The CIL rate is set out in our Charging Schedule:

<http://www.havant.gov.uk/sites/default/files/documents/HBC%20CIL%20Charging%20Schedule%20Full%20Document%20Feb%202013.pdf>

This development is zero rated and therefore is not CIL Liable and no CIL Forms are required.

S106

Should a S106 Agreement be necessary, as part of the 'Heads of Terms' it would be necessary to include monitoring fees. The amended CIL Regulations effective 1/9/2019, which have already passed through the parliamentary process (concluded 27/6/19) legitimise the collection of S106 monitoring fees. We already have an agreed schedule of Charges

Officer Comment: *The S106 Agreement recommended in association with this application relates to Hampshire County Council requirements and therefore no monitoring fees will be required for HBC.*

Conservation Officer

Final Comments

Overview

Langstone Technology Park consists of four main buildings of modular construction with minimalist landscaping linking around the buildings.

The site is a 'campus style' industrial park with buildings dating from the early 1970s. Originally built for IBM it housed one of two manufacturing plants in the UK. Building 7000 and the first two bays of building 1000 were the first to be built on the site and appears in the In-house Arup Journal April 1971 the caption refers to the building being completed in 1970.

The buildings were designed and built by Arup with landscaping for the courtyard and grounds by James Russell. Design 39 Journal- VADS reports that 'the Financial Times award for industrial architecture 1972' was won by 'the new plant at Havant, Hampshire, designed by Arup Associates'.

In terms of social history, the sites links with the development of the computing

technology is of significance. Taking account of the above I would consider the Arup buildings to be non-designated heritage assets. It should be noted that building 6000 had been put forward to Historic England for listing. The decision has recently been issued with confirmation that the building was not suitable for listing.

Proposal

Part-demolition of Building 1000 and associated works; the erection of new flexible use industrial units; and a new parking layout with associated works to layout and access.

Assessment

The current buildings because of their design/construction provenance and social history significance should be considered collectively as non-designated heritage assets. Whilst the existing buildings are quite plain by today's standards they do represent an era of design and have by their association to Arup a certain level of standing in terms of design. Therefore, any proposed alterations would need to have some gravitas in its own design. I have considered each part of the proposal below:

Part demolition of Building 1000

This relates to the proposed demolition of the two eastern bays of Building 1000, the former manufacturing floor, and replacement to provide additional car parking capacity. The assessment of Building 1000 identifies it as being part of the factory complex to undertake the manufacturing process, with some office space at the eastern end within Bay 1, of which only the dated appearance of the conference room remains. The two bays of the building to be demolished were an original component of the complex and was in situ when the plant received the 1972 Financial Times award for industrial architecture. The building was subsequently extended (by 3 further bays) over time, each time replicating the established 'bay' pattern of the building with central brick service 'core' and large open floor space.

From a heritage perspective the demolition of the two original bays would result in the loss of part of a significant local heritage asset which as part of the group of Arup buildings makes a positive contribution architecturally. It also has local distinctiveness, which provides a historic link to the area's link with the high-tech computer industry that once took place on the site. Nonetheless, the two bays in question have been clearly altered internally on a number occasions to suit the needs of companies who have subsequently used the building. I can also understand that the building would only suit a niche area of the rental industrial market as it is a large single storey expanse with limited natural light.

The new design of the elevations is considered appropriate and sympathetic within its context. It will also allow for some further natural light enhancing the internal space. However, replacing the existing building with car parking is disappointing. Whilst provision is made for landscaping, the car parking is relatively non-descript and does not add anything to the site other than providing car spaces which will be lost due to the new flexible industrial units proposed.

A balanced judgement will be needed on this point. The planning officer should also be convinced that there is sufficient marketing evidence in the application to support that the units can't be used.

Erection of new flexible use industrial units

In principal I would have no objection to the construction of new appropriately designed units on the site. The existing buildings and landscaping within LTP provide an attractive context for the development and it is considered important to maintain the high standard of commercial buildings and the harmonious appearance of the site.

Following submission of amended plans the design of the buildings still appears to be very standard for this type of industrial use and offers very little in detailing or appearance that harmonise the units with the rest of the site. The units also still turn their back to the existing buildings which means that a very large and blank rear elevation at 16m in height faces the main site. This gives the appearance that the new units are an insular and separate industrial site where the case should be that this forms part of the wider campus style that currently exists.

However, the changes made to the elevations (including landscaping) have softened the appearance of the development. The recent listing decision that building 6000 was not worthy of listing has meant that there will be little heritage impact on this building itself.

On balance whilst the proposed development would certainly benefit from design amendments I cannot now maintain an objection on heritage grounds.

New parking layout with associated works to layout and access

From a heritage perspective I have no objection to these parts of the scheme.

Original Comments

Overview

Langstone Technology Park consists of four main buildings of modular construction with minimalist landscaping linking around the buildings.

The site is a 'campus style' industrial park with buildings dating from the early 1970s. Originally built for IBM it housed one of two manufacturing plants in the UK. Building 7000 and the first two bays of building 1000 were the first to be built on the site and appears in the In-house Arup Journal April 1971 the caption refers to the building being completed in 1970.

The buildings were designed and built by Arup with landscaping for the courtyard and grounds by James Russell. Design 39 Journal- VADS reports that 'the Financial Times award for industrial architecture 1972' was won by 'the new plant at Havant, Hampshire, designed by Arup Associates'.

In terms of social history, the sites links with the development of the computing technology is of significance. Taking account of the above I would consider the Arup buildings to be non-designated heritage assets. It should be noted that building 6000 has been put forward to Historic England for listing. The outcome of this has yet to be decided.

Proposal

Part-demolition of Building 1000 and associated works; the erection of new flexible use industrial units; and a new parking layout with associated works to layout and access.

Assessment

The current buildings because of their design/construction provenance and social history significance should be considered collectively as non-designated heritage assets. Whilst the existing building are quite plain by today's standards they do represent an era of design and have by their association to Arup a certain level of standing in terms of design. Therefore, any proposed alterations would need to have some gravitas in its own design. I have considered each part of the proposal below:

Part demolition of Building 1000

This relates to the proposed demolition of the two eastern bays of Building 1000, the

former manufacturing floor, and replacement to provide additional car parking capacity. The assessment of Building 1000 identifies it as being part of the factory complex to undertake the manufacturing process, with some office space at the eastern end within Bay 1, of which only the dated appearance of the conference room remains. The two bays of the building to be demolished were an original component of the complex and was in situ when the plant received the 1972 Financial Times award for industrial architecture. The building was subsequently extended (by 3 further bays) over time, each time replicating the established 'bay' pattern of the building with central brick service 'core' and large open floor space.

From a heritage perspective the demolition of the two original bays would result in the loss of part of a significant local heritage asset which as part of the group of Arup buildings makes a positive contribution architecturally. It also has local distinctiveness, which provides a historic link to the area's link with the high-tech computer industry that once took place on the site. Nonetheless, the two bays in question have been clearly altered internally on a number occasions to suit the needs of companies who have subsequently used the building. I can also understand that the building would only suit a niche area of the rental industrial market as it is a large single storey expanse with limited natural light.

The new design of the elevations is considered appropriate and sympathetic within its context. It will also allow for some further natural light enhancing the internal space. However, replacing the existing building with car parking is disappointing. Whilst provision is made for landscaping, the car parking is relatively non-descript and does not add anything to the site other than providing car spaces which will be lost due to the new flexible industrial units proposed.

A balanced judgement will be needed on this point. The planning officer should also be convinced that there is sufficient marketing evidence in the application to support that the units can't be used.

Erection of new flexible use industrial units

In principal I would have no objection to the construction of new appropriately designed units on the site. The existing buildings and landscaping within LTP provide an attractive context for the development and it is considered important to maintain the high standard of commercial buildings and the harmonious appearance of the site. The design of the units should therefore seek to pick up on the existing colour scheme of the buildings and design features whilst recognising the need to provide modern and adaptable premises for future occupiers. However, I do not believe the current design or siting of the proposed units currently meets this requirement.

The design of the buildings appears to be very standard for this type of industrial use and offers very little in detailing or appearance that harmonise the units with the rest of the site. In particular the relationship between units 6-9 and building 6000 appears unnecessarily tight for what is large site. The units also turn their back to the existing buildings which means that a very large and blank rear elevation at 16m in height faces the main site. This gives the appearance that the new units are an insular and separate industrial site where the case should be that this forms part of the wider campus style that currently exists.

New parking layout with associated works to layout and access

From a heritage perspective I have no objection to these parts of the scheme.

Countryside Access Team HCC

Final Comments:

According to the Response to Consultees on Transport and Highways Matters dated October 2019 Footpath 51 only provides an alternative recreational route and is of no relevance to the development proposed. On the request of volunteers from SSE at the Technology Park our Central East Countryside Access Team previously undertook work with the staff to improve the surface of Footpath 51 in order to improve access to the coast and Langstone Harbour for staff and the local community. The volunteers reported that Footpath 51 is well used at particularly lunchtimes for walking and access for leisure and provides an extremely popular link to the coast and Langstone Harbour; which if improved the staff considered would be significantly useful to themselves and the local community. We therefore do not agree with the 'Response to Consultees on Transport and Highways Matters' document that this off-road green pedestrian route does not provide essential connectivity or that there is no desire line for access to the south of the site via the PROW network.

The Central East Countryside Access Team have advised that, while enhancements seen in the photograph in drawing 20428-048 Walking and Cycling Routes have improved the accessibility of the Footpath, further work is needed. The Countryside Service does not seek to recommend works to the river to address flooding. We have recommended that the surface of Footpath 51 should be upgraded to significantly improve drainage and to address issues of standing water ensuring that the route would become usable more quickly following any flooding event. Previously the route could not be walked for most of the winter and spring due to the standing water or puddles. The works undertaken to date have improved some sections of the surface, extending use for a few more months of the year, but currently the route enjoyed by SSE staff still becomes extremely wet and boggy in the winter months.

As the initial works to Footpath 51 pictured in the Response to Consultees on Transport and Highways Matters document were undertaken at the request and with the help of SSE staff we consider that the requirement for a contribution to further improve Footpath 51 is reasonable and directly related to the development as proposed and in accordance with local policy and guidance provided by NPPF. We consider that a contribution toward enhancement of Footpath 51 to the north and south of the Technology Park is needed to mitigate the proposed increase in staffing and parking and is directly linked to the development proposed.

Officer Comment: *Improvements to footpath 51 have been secured (via the S106 Agreement) along the eastern side of the site, improving usability and links to the surroundings. These improvements have been sought by HCC Highways to improve sustainability.*

Original Comments

Please accept this response as being that of the Countryside Service, in relation to this application we are responding on behalf of Hampshire County Council as Highway Authority in respect of Public Rights of Way.

Site Context: Havant Footpath 50 runs east-west along the northern boundary of the site then links to Havant Footpath 51 part 2 which runs down the eastern Boundary alongside the River and Havant Footpath 51 part 1 which leads northward through the underpass to Solent Road.

A copy of the Definitive Map of Rights of Way can be found at <https://www.hants.gov.uk/landplanningandenvironment/rightsofway/definitivemap>

Comment:

In the pre-application GEN/19/00046 both HCC Highways and HCC Countryside Service highlighted the need for improvements to Havant Footpath 51 to provide pedestrian and cycle access to work. Highways said in their response that this should be upgraded with a bound tarmac surface to allow shared use for cyclists and walkers.

The Design and Access Statement Principle 4 states: 'Reinforce Walking and Cycling - Encourage walking and cycling through coordinating existing routes. Increase permeability, security and safety.' We support this and it is in line with Local Plan Policy and the National Planning Policy Framework. However, Footpath 51 on the East side of the site is often impassable during the winter months therefore surface improvements are needed to make this route usable year-round for employees to access Langstone via a safe off-road route and reduce impacts of air pollution to pedestrians or provide a cycle route away from the Langstone Road.

The submitted Transport Assessment has determined that there were good off-road links to the North of the site but has not fully assessed links and need for improvements for cyclists and pedestrians to the South. The access from the South is achieved via Langstone Road. Surfacing and improvements of Footpath 51 would provide an important off-road link to the Southeast and wider cycle links for employees via the Coastal Path away from the busy road.

In the absence of improvements to Footpath 51 the current proposals are not in line with the Design and Access Statement and the requirements of the Highway Authority. We therefore request a contribution towards the surfacing of Footpath 51 to make it a usable year-round path which can be used by walkers and cyclists to link to the site and the North section of Footpath 51 and National Cycle Network Route 22. We would be happy to discuss the cost of the necessary works with the Local Planning Authority and the applicant in conjunction with Highways Development Planning.

Should permission be granted for this application, we request that the applicant is made aware of the following requirements through informatives:

- i. Nothing connected with the development or its future use should have an adverse effect on the right of way, which must remain available for public use at all times.
- ii. There must be no surface alterations to a public right of way without the consent of Hampshire County Council as Highway Authority. To carry out any such works without this permission would constitute an offence under s131 Highways Act 1980.

County Archaeologist

Although some traces of prehistoric activity have been recorded by a past archaeological evaluation immediately to the east of the site, the site itself has been heavily impacted by modern development, including a sewage works that was constructed herein the early 20th century. This was then followed by the construction of industrial units in the mid to late 20th century. As a result, it would be very unlikely for any hitherto unrecorded archaeological features to be exposed during ground works associated with the demolition of the unit and construction of the expanded car park. I would therefore not wish to raise any archaeological issues in this instance.

County Ecologist

Final Comments

The application is now accompanied by a Biodiversity Enhancement Plan (The

Ecology Co-op, October 2019). This includes measures to transplant an area of species-rich grassland (containing orchid species) within the site. I am supportive of any measure to avoid permanent impacts to this grassland (the presence of orchid species indicates that it is generally unimproved and of high species-richness). I would strongly recommend that a minimum 15cm depth of soil is transplanted and that as much of the grassland surrounding the orchid species is retained (the surrounding sward will contain hundreds of orchid seeds and will be crucial in the long-term viability of any plants present). I would also add that it would be prudent to carry out a pre-works survey of the grassland. If works have not commenced by spring 2020 it should be possible to locate and identify the species of orchid present: some species will reach peak flower during April whilst others will emerge later in the summer months or even early autumn.

The persistence of any orchid grassland will be dependent largely on the future management regime. It is imperative that appropriate long-term management is secured: a bespoke mowing regime will be needed that allows any orchids to set seed (the timing will depend on the species) and avoids fertilisation. I welcome the management measures set out within the submitted report.

At this stage, there is no detailed landscaping plan and therefore the proposed bespoke management methods for the orchid grassland (and the other ecological mitigation and enhancement measures) are not included within any site-wide drawing plans. In order for these measures to be secured it is recommended that they are included within any submitted landscape strategy.

Further Comments:

The application is accompanied by a Phase 1 Habitat and Species Survey and a Bat Emergence Survey Report (The Ecology Co-op, June 2019) which together provide a useful assessment of the application site. The majority of the site comprises modern buildings with associated hard surfacing. Vegetation comprises areas of amenity-type grassland, planted ornamental shrubs and herbaceous species as well as woodland at the eastern and western edges. A stream corridor runs along the site's eastern boundary and a small ornamental pond is present.

The site overall is generally considered to be of limited ecological value and I would agree with this assessment. Further bat surveys of one structure, Building 1000, recorded no evidence of roosting bats and no further bat survey works are considered necessary.

An area of grassland to the south of the gymnasium is suspected of being of botanical interest, with orchid species occurring: the presence of orchid species indicates that the grassland is likely to be of greater interest. Further investigation of this area of grassland has been recommended. Again, any updating information that may require the assessment to be amended should be provided prior to determination. Following submission of this additional information, we would expect that firmer details of all mitigation, compensation and enhancement measures be submitted. These should be sufficiently detailed (i.e. not recommendations but firm proposals that can be delivered) so that the LPA is able to secure their delivery by condition. NPPF, Circular 06/2005 and Natural England Standing Advice on Protected Species, require that planning decisions are based on full, up-to-date ecological information and it is essential that all necessary survey, assessment and mitigation information is available to the LPA prior to determination, particularly in the case of protected species, which are a material planning consideration. This will enable the LPA to determine the application on the basis of full knowledge about the ecological impacts

of the proposal and to ensure that any impacts can and will be mitigated, and are acceptable.

Original Comments

The application is accompanied by a Phase 1 Habitat and Species Survey (The Ecology Co-op, June 2019) which provides a useful assessment of the application site. The majority of the site comprises modern buildings with associated hard surfacing. Vegetation comprises areas of amenity-type grassland, planted ornamental shrubs and herbaceous species as well as woodland at the eastern and western edges. A stream corridor runs along the site's eastern boundary and a small ornamental pond is present.

The site overall is generally considered to be of limited ecological value. However, one building being impacted by the proposed works is suitable for supporting roosting bats and therefore further bat survey works are considered necessary. These surveys must be completed prior to determination and any necessary mitigation measures agreed.

Similarly, one area of grassland is suspected of being of botanical interest, with orchid species occurring: the presence of orchid species indicates that the grassland is likely to be of greater interest. Further investigation of this area of grassland has been recommended. Again, an updating information that may require the assessment to be amended should be provided prior to determination.

Following submission of this additional information, we would expect that firmer details of all mitigation, compensation and enhancement measures be submitted. These should be sufficiently detailed (Le. not recommendations but firm proposals that can be delivered) so that the LPA is able to secure their delivery by condition.

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

County Minerals

No comments received

Crime Prevention -Major Apps

No comments received

Department of Transport, Highways England

Referring to the planning application for "Part-demolition of Building 1000 and associated works; the erection of new flexible use industrial units; and a new parking layout with associated works to layout and access" referenced above, dated 13th August 2019 at Langstone Technology. Park, 2B Langstone Road, Havant, P09 1 SA. Notice is hereby given that Highways England's formal recommendation is that we:

a) offer no objection;

Highways Act Section 1758 is not relevant to this application.

This represents Highways England formal recommendation and is copied to the

Department for Transport as per the terms of our Licence.

Economic Development HBC

The proposal is for part demolition of the existing Building 1000 premises (B1 Use Class) and the erection of new flexible use industrial units (B1/B2/B8 Use Classes). We understand that the proposed development will provide for a much-needed change to the facilities at Langstone Technology Park and subsequently, result in an improved offer for Langstone Technology Park (Paragraph 4.5).

Economic Development Office supports this application and notes that the proposed development will provide for new and modern flexible industrial units in B1c, B2 and B8 Use Classes to meet the growing needs of the businesses in the area. We do acknowledge that there is an increased need for modern industrial premises required to meet modern standards and enable local businesses to compete effectively in a globalised market. As such, the proposed development will allow existing businesses to grow and expand locally while attracting new businesses to the borough.

This proposal advances the Havant Borough Core Strategy (adopted March 2011) which seeks to provide employment to the borough and contribute towards a reduction in out commuting. We consider that the proposed development is in accordance with the emerging Havant Borough Local Plan 2036 and, emerging Local Plan Policy C1 which seeks to retain existing employment sites by reinforcing their function and role. This proposal also supports policy KP6 of the emerging Local Plan 2036 in so far as it provides a comprehensive redevelopment of Langstone Technology Park, providing new or converted B1, B2, and B8 floorspace as well as a range of employment opportunities and support the needs of emerging sectors.

The proposal is also in line with Paragraph 80 of the National Planning Policy Framework which recognises the need to support economic growth and productivity whilst considering local business needs and the wider opportunities for development.

Overall, we consider that the proposed development supports Local Plan Policies CS2 and CS3 of the Havant Borough Core Strategy, Emerging Local Plan Policies C1 and KP6 as well as Paragraph 80 of the National Planning Policy Framework in so far as it retains the existing site in business use (UCO) purposes, provides for local employment and contributes towards addressing local business needs.

Engineering/Drainage

No comments received

Environment Agency

Final Comments

Environment Agency Position

We have reviewed the new submitted information and consider that it satisfactorily addresses our earlier concerns. We therefore withdraw our previous objection.

Environmental permit

Planning permission does not remove the requirement for an Environmental Permit. The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood

defence (including a remote defence) or culvert

- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Officer Comment: An Informative is recommended in relation to the need for an Environmental Permit.

Original Comments

Environment Agency position

In the absence of an acceptable flood risk assessment (FRA) we object to this application and recommend that planning permission is refused.

Reason(s)

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- . take the impacts of climate change into account adequately
 - o There is no assessment of the impact of climate change using appropriate climate change allowances. For peak river flow allowances for less vulnerable developments use the central allowance found using this link - 'Flood risk assessments: climate change allowances'. Table 3 shows the allowances for sea level rise for the lifetime of the development
- . consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event
 - o Safe access and egress routes
- . consider how a range of flooding events (including extreme events) will affect people and property
 - o Resistance and resilience measures

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above. The extents of peak river flows and sea level rise for the lifetime of the development need to be assessed.

The application needs to demonstrate that occupants can remain safe for the lifetime of the development when allowances for climate change are taken into consideration. There needs to be sufficient flood risk mitigation up to the design flood level and/or specified arrangements for safe access and egress.

In accordance with the Planning Practice Guidance (Ref. 10: 20150415), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

The Environment Agency will always support and substantiate its objections to major development proposals at appeal wherever a refusal is lodged in line with its advice. If you are minded to grant permission against the Environment Agency's advice, please contact the Planning Liaison Officer named below before making a formal decision to discuss the conditions and informatives that the Environment Agency would wish to apply to this proposal.

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify the Environment Agency to explain why material considerations outweigh our objection, and to give us the opportunity to make further representations. Should our objection detailed above be removed, it is likely we will recommend planning conditions to be included on any subsequent approval.

Environmental permit

Planning permission does not remove the requirement for an Environmental Permit. The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place

- . on or within 8 metres of a main river (16 metres if tidal)
- . on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- . on or within 16 metres of a sea defence
- . involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- . in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Environmental Health

Final Comments:

Observations / Comments:

I have read through the additional relevant documentation provided by the applicant and have no objection in principle to the proposed development.

I had previously requested confirmation that MGV / HGV traffic to and from the proposed new industrial units, to be situated within a part of the existing south car park, would be routed through the Brookside Road site entrance. I note from the document titled 'Response to Consultees on transport and highway matters - 23 October 2019' that it is advised herein that 'this note confirms and clarifies this is the case'. Reference is also made to the internal road layout being constrained to prevent routing of HGV's within the site, and that appropriate internal signage will be provided to direct HGV's (as depicted on DTA drawing 20428-05 HGV Routing restrictions, attached to the above document). The above is satisfactory to this office if implemented as such. The above comments will not prejudice any comments that may still be made by other consultees.

Secondly as previously advised with regard to the Acoustic report 18980.PPCR.01.Rev D, baseline background levels have now been established for both day and night time periods. These can then serve as a baseline for each of the future units occupants, to ensure that any potential noise generating operation, be it during the day or night, can

be assessed if required, for each individual unit, against these baseline levels. Any mitigation measures that may be required, to ensure no adverse impact on existing residential receptors, must then be implemented. I would therefore ask that a condition similar to that as suggested on page 9 (Item 5) of the above report should be added to any positive decision by the Planning authority.

"The external sound level emitted from plant, machinery or equipment at the development shall be equal or lower than the representative background sound level, with noise levels assessed (if necessary) in accordance with BS4243:2014 at the nearest and/or most affected noise sensitive premises."

Reason: To protect the amenity of the nearest residential receptors.

It should be noted that the British standard referred to in this condition, BS4243:2014 is, I believe is a typing error and should read as BS4142:2014.

I would also ask that the following informatives be added to any future full application approval that may be granted.

Informatives:

Regarding Hours of Work

Regarding Dust Control

Regarding light nuisance

Original Comments

I have read through the documentation provided by the applicant and have no objection in principle to the proposed development.

I note that the two points of concern I had raised at pre-application stage have been covered, with an acoustic survey to determine baseline background levels, and comments related to MGW / HGV traffic access to the site.

It is intimated that MGW & HGV traffic will be using the Brookside Road site entrance in relation to the proposed erection of new industrial units within part of the existing south car park. If this can be confirmed and/or conditioned, I would have no further adverse comment to make in this regard.

With regard to the Acoustic report 18980.PPCR.01.Rev D, baseline background levels have now been established for both day and night time periods. These can then serve as a baseline for each of the future units occupants, to ensure that any potential noise generating operation, be it during the day or night, can be assessed if required, for each individual unit, against these baseline levels. Any mitigation measures that may be required, to ensure no adverse impact on existing residential receptors, must then be implemented.

A condition similar to that as suggested on page 9 of the above report should be added to any positive decision by the Planning authority. It should be noted that the British standard referred to in this condition, BS4243:2014 is, I believe is a typing error and should read as BS4142:2014.

I would also ask that the following informatives be added to any future full application approval that may be granted.

Informatives:

Regarding Hours of Work:

Regarding Dust Control:

Regarding light pollution:

Environmental Health (Environmental Control Officer):

Final Comments

Observations / Comments:

Comments here relate to the revised REC Air Quality Assessment (AQ107578R1) & OTA Response to Consultees on Transport and Highways Matters (RJMj20428-06e Response).

Further comments may be received from my colleague (Lisa Ouffy) under separate cover in relation to other matters. These comments should be read in conjunction with those made previously (APP/19/00703 made under CONS/19/01560 & dated 27/08/2019); this response only supersedes that response where comments overlap.

Traffic Assessment

Pages 7 & 8 provide some clarification on the traffic routing model applied, and Appendix F contains additional traffic figures.

It is noted that material inconsistencies exist between the proportional distribution, and the net change figures presented, and also between the net change figures for site trip generation and those accounted for at both Peak Periods and on a 12 Hr basis. The reason for this is unclear.

The figures presented appear to assign the majority of 'saved' trips to the East access (Langstone Road), despite the survey data indicating an approximate 50/50 split between east & west.

Air Quality Assessment

The Transport Assessment indicates that the Air Quality assessment has been reconciled to traffic figures which are consistent with the Transport Impact / Junction Capacity Assessments.

This change has materially altered the results of the Air Quality assessment, almost universally elevating the baseline (OM) scenario, and reducing the 'with development' (OS) scenario predicted concentrations.

At least one 'stand-out' anomaly exists - with a substantial (>10% NAQS Objective, or 4 ug/m3) Nitrogen Dioxide concentration response at R18 (Rectory Road), based upon a net change in traffic on the closest link of <40 vehicles MDT. An equivalent magnitude of response is not seen in receptors close to Langstone Road, where around 70% of the trip reduction associated with the development (relative to 100% occupancy) has been allocated.

Taken together with the inconsistencies within the traffic data presented in RJM/20428-06e Response; this undermines confidence in the accuracy of results.

Ultimately, the 'headline' is that the proposed development is expected to yield a reduction in whole site trip generation relative to its consented landuse (at 100% occupancy). Conceptually, an adverse air quality impact of material significance cannot arise from a reduction in traffic unless there is a substantial shift in vehicle type, routing bias, or temporal distribution of the traffic generated.

For this reason, I do not require the amendment of the air quality report, and can accept it's overall conclusion on a broad conceptual basis, subject to Hampshire County Highways being satisfied in the robustness of the junction capacity assessment & the impact shown being either non-adverse or of acceptably low magnitude.

The comments of the Landscape architect regarding cycle & pedestrian enhancements are noted, and supported as positive amendments from an air quality perspective.

Similarly, the allocation of roof space for PV installation to meet the required BREEAM standard is considered to represent a positive scheme enhancement from an air quality perspective.

I would highlight that the parking layout plans do not appear to have made a design response to the requirement to provide a minimum allocation of EV charging bays. I have not had time to go through the design and access statement, so it is possible that this element has been addressed elsewhere. If not, I would point to the comments of PPUD, and would support the requirement for an EV charging provision in the proposed car parking, as a positive air quality measure.

On the basis of the comments above, and subject to caveats described, the development can be supported.

SuDS / Pollution

I have not reviewed the revised documents in detail, but I have noted the comments of the LLFA, which accept the proposals, but don't appear to address pollution mitigation specifically. Please refer to previous comments made.

Contamination

Previous comments / recommendations remain valid.

Original Comments

Observations I Comments:

I have reviewed the application supporting documents, a inclusive of the REC Air Quality Assessment Report, Peter Brett Transport Assessment, Delta Simons Preliminary Geo-Environmental Risk Assessment, the Drainage and Flood Risk Assessment, and related Scheme Design/Sustainability Documents.

Given the documents submitted, it is appropriate to provide comments on interrelated areas of 'air quality / sustainability / transport' (air quality), and 'contamination / ground conditions / drainage strategy' (contamination), and drainage strategy (pollution).

Contamination

The Risk Assessment highlights some results from preceding rounds of investigation (not previously reviewed), including suggestions of possible ground gas issues, groundwater contamination with persistent aquatic pollutants, and evidence of localised contamination with arsenic and toxic heavy metals (Pb, Hg, Cd). Site walkovers have in the past identified other features that warrant caution - including the storage and handling of cyanide and industrial solvents - in the latter case, within in below-ground storage areas.

The site is large, and the relative low-sensitivity in terms of human health is accepted - however the site is also bound to the East by the Lavant, and the site is less than 1 km

upstream of internationally protected aquatic habitat. The risk driver for the site is likely to be the potential pollutant linkage between identified contaminants toxic to aquatic ecosystems (Heavy Metals, PAH I BTEX, and Chlorinated Solvents), and potentially significant, mobile contaminants such as cyanide.

Section 6.1 of the Delta-Simons report acknowledges this, recommending an intrusive SI within the development areas to include sampling of soils, leachate, groundwater and soil-gas - largely for the purpose of confirming a suspected low risk.

On the basis that there are sensitive receptors immediately adjacent to the site, shallow groundwater (a contaminant migration vector) has been identified alongside a feature which may be capable of acting as a preferential migration pathway (vector between source and receptor) for mobile contaminants, and that there are numerous potential sources of contaminants relevant to the adjacent receptor - I would agree that investigation is prudent.

It is also acknowledged that the proposed development could in principle be significantly affected by contamination (particularly gas), and so there is also some merit in confirming an anticipated low risk to the future occupants. I would recommend that the investigation proposed in section 6.1 be secured by means of suitable conditions, suggested wording below:

Condition 1 (Contamination - omitting EDS, based upon submitted proposals)

Prior to the commencement of any specific phase of development approved by this planning permission (other than demolition, site clearance, or any other date or stage in development as may be agreed in writing with the Local Planning Authority), an assessment of the nature and extent of contamination at the site, whether originating from within or outside the curtilage, shall be submitted to and approved in writing by the Local Planning Authority.

The assessment may comprise separate reports as appropriate, but shall be undertaken by competent persons and unless specifically excluded in writing by the Local Planning Authority, shall include;

1) An intrusive site investigation based on the proposals outlined within the Preliminary Geo-Environmental Risk Assessment Re'-19-0687.01 (section 6.0); to provide sufficient data and information to adequately identify & characterise any physical contamination on or affecting the site, and to inform an appropriate assessment of the risks to all identified receptors.

2) The results of an appropriate risk assessment based upon (1), and where unacceptable risks are identified, a Remediation Strategy that includes;
. appropriately considered remedial objectives,
. an appraisal of remedial &/or risk mitigation options, having due regard to sustainability, and;
. clearly defined proposals for mitigation of the identified risks, and;

3) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out any Remediation Strategy required under (2) are complete, identifying any requirements for longer-term monitoring of pollutant linkages, maintenance of engineered mitigation measures, and arrangements for contingency action.

All elements shall be adhered to unless agreed in writing by the Local Planning

Authority.

Reason: Having due regard to policies DM10 of the Havant Borough Adopted Core Strategy (2011) and DM17 of the Havant Borough Local Plan (Allocations) (2014), Contamination may be present at the site as a result of previous land uses (&/or activities) on site and in the vicinity, that could pose a risk groundwater & local surface waters (ecology), to the proposed buildings, and future occupiers of the site.

Verification (Standard) [2]

Prior to the occupation of any relevant part of the permitted development, any verification report required in accordance with condition [1] shall be submitted to and approved in writing by the Local Planning Authority.

The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan, and must demonstrate that site remediation criteria have been met. Where longer-term monitoring of pollutant linkages is identified as being necessary, the report shall clearly set out plans for monitoring, provision for maintenance, relevant triggers and contingency actions (a "long-term monitoring and maintenance plan").

The long-term monitoring and maintenance plan shall be implemented as approved.

Reason: Having due regard to policies DM10 of the Havant Borough Adopted Core Strategy (2011) and DM17 of the Havant Borough Local Plan (Allocations) (2014), Contamination may be present at the site as a result of previous land uses (&/or activities) on site and in the vicinity, that could pose a risk groundwater & local surface waters (ecology), to the proposed buildings, and future occupiers of the site.

Drainage Strategy (Pollution)

The drainage strategy (Clancy Consulting 8/1982) identifies existing private stormwater drainage features which represents the applicants preferred option for disposal of site surface water.

It is noted that the Environment Agency has no objection, and that a permit will not be required provided that the water is 'clean' (i.e. that sufficient pollution attenuation features are present upstream of the discharge point, in accordance with the SuDS manual guidelines).

The strategy describes some pollution control measures. Car parking area are reliant upon a permeable-paving solution for exclusion of suspended solids and hydrocarbons from the surface water system. With reference to the landscaping scheme, which calls for impermeable access roads (including between parking bays), this strategy implies that impermeable areas fall to permeable areas and are not positively drained. If this is the case, and the permeable surface is capable of passing the water falling directly upon it's surface + the contribution from the impermeable surfaces - then this element of the strategy may be agreed.

If (however) the impermeable surfaces are to be positively drained, the pollutant attenuation capacity of the permeable surface cannot be relied upon for the area occupied by the impermeable access roads, and so downstream attenuation features will be necessary.

I note that permeable surfacing is not proposed for the industrial areas, due to their inability to meet the required load-carrying requirements. These areas are to be

positively drained, and the drainage strategy confirms that 2 no. Hydro-International "Downstream Defender" units are proposed to provide the necessary primary & secondary treatment (a single unit is insufficient to manage the anticipated pollutant inputs, so these are to be connected in series).

This is acceptable in principle, though with reference to the drainage layout I note that the treatment is proposed downstream of the flow-rate attenuation (hydrobrake chamber, limiting to a fairly high rate of 132 l/s), and that roof water is not to be separated from the surface water collection system.

The Environment Agency often requests a condition precluding the passing of roofwater via in oil interceptor unit, in order to minimise the risk of 'wash through' or bypass of attenuation chambers during periods of high flows. The proposed downstream defender units are in lieu of oil interceptor units which are commonly installed at such developments to manage the elevated risk. Given the reduced pollutant attenuation rating quoted in the report (for the Downstream Defender units), I would assume that an equivalent or higher risk of 'wash through' exists (relative to a proprietary oil interceptor) , and therefore that the reason for seeking to separate roof water & surface runoff would equally apply to this scheme.

Whilst I will leave it to the LLFA to comment on the flow attenuation and storage capacity volumes -I would recommend that the applicant consider separating the surface water systems (i.e. to dispose of roofwater direct, and pass hardstanding runoff from the industrial area via the Defender units) in order to avoid the risk of washout / wash-through when operating at high flow rates.

If the applicant is not amenable to a scheme amendment, I would recommend that additional information is requested from the applicant to demonstrate the efficacy of the units for pollutant attenuation & retention under anticipated maximum flow conditions (recognising that the design flow rate quoted will likely not represent a maximum flow rate if comprising a venturi-type device).

It may also be prudent to seek the opinion of the Environment Agency on the need (or otherwise) for separating the systems, taking full account of any additional information provided by the application in respect of pollution attenuation performance.

Other than this, I have few concerns - the drainage strategy provides a clear statement of liability for the private drainage system, and a commitment that the Operations & Maintenance Manual will include all measures described in the drainage strategy. The system is uncomplicated from the perspective that there are no 'soft' SuDS measures - the system comprises 100% 'engineered' SuDS which whilst lacking some of the ancillary benefits, is likely to be more reliable / lower maintenance.

Air Quality (Assessment of Impact)

I note that a number of the local objections relate to the concentration of parking adjacent to the East access. This is interpreted by objectors as being contrary to policy, and as risking a routing bias that is perceived to be likely to lead to additional congestion at the A3023fEast Access due to turning movements, and by extension to be a directly associated air pollution impact.

The Air Quality Assessment (REC report Ref: AQ107578 iss.1) aims to quantify the air pollution impact at the East Access. It is worth noting that the Air Quality assessment is heavily reliant upon the veracity of the baseline traffic flow estimates from which the development emissions impact derives, and that in the context of the Air Quality

assessment, these are presented as 'black box' estimates which do not directly derive from traffic surveys presented in the Transport Assessment (DTA report Ref: RJMfAK/20428-04c TA).

The Transport Assessment is primarily concerned with the traffic impact on junction capacity & flow during peak periods, and surveys consisted of East & West Access automatic traffic counts, manual turning counts at the A3023 site access and the Brookside Road / Southmoor Lane junction, and U-Turn Counts at Woodbury Avenue & Langbrook Close. No AADT conversion factors are presented, and it is consequently unclear how the baseline traffic flows have been derived for the Air Quality Assessment.

The Air Quality (impact of development) Assessment is concerned with the change in traffic flows as a result of the development, meaning that the most critical factor is the development-related traffic growth, and its distribution on the local road network. Flow figures are presented within the Air Quality Assessment for both 2020 'baseline growth' (Do Minimum, DM) and + 'baseline growth + development contribution' (Do Something, DS) scenario's. The report does not specifically identify individual road links - Figure 7 shows 'whole modelled network' only. This makes it very difficult to interrogate the conceptual traffic distribution model applied.

Interrogation of the model is important, as the traffic distribution underpins the Air Quality Assessment, and if the traffic model is flawed, the Air Quality assessment will reflect those flaws.

With reference to the DM & DS traffic flow scenarios presented in Table A11.2, the distribution model appears anomalous. Traffic reductions are anticipated under the DS scenario at both site accesses, consistent with an overall, systemic reduction in transport demand as a result of the development.

Taken at face value, this is entirely inconsistent with the DS scenario, which accounts for material traffic growth on all Langstone Road Links, A27 Westbound & All A27 slip roads as a direct result of the development. If the development reduces overall transport demand (of the Langstone Tech Park, as an origin or destination), why then is there development-related traffic growth represented across almost the entire modelled local road network, other than at the site accesses & on the Harts Farm Way approach to the West Access?

This is sufficient to question the usefulness / reliability of the air quality assessment - certainly until conceptual basis for this apparently anomalous distribution is clarified.

It is not considered that the air quality assessment is sufficiently robust as to support a conclusion that a non-negligible/adverse development air-quality impact is unlikely. It must be acknowledged that the receptors modelled as R1 to R3 (Regents Court, The Limes) are arguably the most 'at risk' receptors in the Borough, in terms of likelihood of exceeding National Air Quality Strategy (NAQS) objectives, so any possibility of 'real world' adverse impact could materially increase the risk of triggering a Council duty to step in to manage local air quality.

Any adverse effect is unlikely to warrant an objection to the principle of development (given the theoretical consented use travel demand), however it might justify the enhancement of the sustainability credentials of the proposed buildings, a specific design response which aims to further limit the use of the East access (e.g. access road layout and signage), or a commitment to more ambitious travel plan targets.

I would recommend that clarification is sought on the traffic model underpinning the air quality assessment, as a starting point.

Transport Assessment

The study establishes that the site is operating at around 70% occupancy. It follows that the transport demand potential of the existing site use is elevated relative to the actual transport demand under present (baseline) conditions. It also follows that there is a critical difference between what is a significant change in 'real world' terms, and what represents a material change in planning terms.

The transport assessment essentially concludes a broadly neutral (actually slightly positive) development impact at the East Access relative to the 'existing potential demand'. This would correspond to an increased demand relative to current East Access transport demand, and it is worth noting that a successful development is likely to reduce the gap between 'theoretical' and 'actual' demand relative to the existing configuration of the site.

In planning terms however, it would seem conceptually impossible to conclude that a marginally reduced transport demand relative to the theoretical demand of the presently consented land use could ever be deemed to be severe, such that the development could be considered to be contrary to policy. The focus should therefore be on whether there may be a 'sub-severe' real-world impact i.e. relative to existing actual demand) which could significantly affect local air quality, and which might warrant consideration of mitigation measures.

For example, reaching junction saturation conditions during peak periods could precipitate disproportionate emissions impacts through interference with the free-flow of traffic on links & trips whose origin or destination is not the development site.

Transport Assessment presents peak period junction capacity assessments for the respective site access junctions, and of these, the Langstone Road (site East access) is of the greatest interest. The PICADY summary for the East access indicates that the southbound right-hand turn movement into the site is presently operating at well within its design capacity under 'theoretical' AM peak conditions, at an RFC of 0.71 (c.f. a recommended <0.85). Under 100% occupancy, the RFC (AM peak) climbs to 0.89.

The Queue length survey presented would appear to offer a slightly less optimistic view of capacity, with the 15 minute segment AM peak queue (existing demand) of 18 vehicles (90m approx, relative to an available 85m stacking space in the right hand turn lane). The RFC for the peak hour does not reflect the saturation of this lane, and it is considered that increased real-world demand at this junction will lead to an increased frequency of saturation of this turning lane in the AM peak, and will have a consequential impact upon lane 2 (southbound merging lane).

The Report identifies a similarly capacity issue at the East Access, with a current / baseline RFC of 0.7, a theoretical (100% occupancy, consented baseline) of 1.04, and a development scenario of 1.01 (over-capacity, but less so than consented maximum). This implies that much of the capacity problem will be restricted to the internal site access road, which has sufficient stacking space to accommodate waiting vehicles. It is also recognised that the problem could be 'self limiting' to a degree, in that vehicle leaving the site could choose to use the West access to avoid an outbound turning movement queue (and local congestion on Langstone Road which is likely to be the causative factor).

This is an interesting observation, as the Air Quality report returns a marginal adverse change in air quality at all modelled receptors other than those closest to the site access stacking capacity - indicating that this effect is not represented in the Air Quality model.

Other observations / comments may be briefly summarised as below;

- . The relative accessibility of the site is agreed - access to a broad range of public transport services is assured by both the rail & bus stations being within walking distance, and pedestrian / cycle facilities being of good quality

- . As a result of the site's structural accessibility, the framework travel plan is expected to have a good probability of success in shifting employee trips from single-occupancy private motor car trips to a range of more sustainable transport modes. It would be appropriate for the framework plan to set challenging mode-shift targets. It is considered that a -5% target falls short of challenging given the opportunities for sustainable travel to the site.

- . The routing of HGV traffic via the West Access under the proposed construction traffic management plan (6.11.1 & 6.11.3) is agreed to be likely to be effective in minimise the air quality impacts of the development phase, and is therefore supported.

- . The restriction of HGV traffic to the East Access is agreed to be likely to be effective in minimising the both the traffic & air quality impact of the new industrial development. It is understood that this will remove existing HGV trips which currently utilise this junction, and could in this sense represent a net positive impact. The mode of restriction is agreed to be likely to be successful/effective.

- . The balance of parking and site access road layout changes are considered to be likely to maintain and support the broadly even split between the East & West Accesses.

I would conclude that it is plausible that the development will have a broadly neutral impact at it's access points to the local road network relative to the existing potential usage. In planning terms therefore it would be difficult to challenge the principal of development on this basis.

The observations on 'real world' traffic impact at the East access (described above) are however relevant to the consideration of Air Quality.

Air Quality (Mitigation)

The Air Quality Assessment makes reference to emerging policy under the Local Plan 2036, but likely refers to a previous draft, identifying E20 (current E22) which concerns the protection of future occupants of development and existing receptors from 'significant negative effects' resulting from development-related changes to air quality (increase in local air pollution).

The assessment does not consider policy E23 (air pollution), which seeks a mitigation of the emissions impacts of all development, irrespective of whether the NAQS objectives apply or not - this policy is about achieving incremental improvements in public health, by reducing personal exposures at all locations including workplace environments and within the general public realm.

The BREEAM assessment includes potential credits for air quality related sustainability features, but these are generally limited, and the development proposals do not achieve the BREEAM criteria for building heating NOx emissions. Credits are awarded in the pre-assessment for commitment to the undertaking of an LZC Energy feasibility study - but this does not amount to a commitment to implementing any LZC features for local generation, heating or cooling applications.

The Design and Access statement similarly does not provide a policy response to the emerging Local Plan 2036, and so does not consider a positive design response to the locally poor air in the vicinity of Langstone Road, or to the Infrastructure requirements to support a transition to electric vehicles. The BREEAM pre-assessment confirms that consideration of a % allocation for EV charging at proposed new parking bays is not to be considered further.

Whilst the Design and Access statement does identify opportunities for 'solar exposure and passive ventilation', there is little in the building or landscape design brief to elevate the sustainability credentials of the scheme in air quality terms. The scheme remains reliant on the emerging E(X) I and IN(X) policies carrying negligible weight at this stage.

The apparent anomaly in the baseline assumptions underpinning the air quality impact assessment could justify consideration of mitigation, and consideration of a design response to emerging policy could comprise a proportionate response to the magnitude of impact identified.

Until the fundamental questions around the Air Quality impact assessment are resolved, it is unclear what, if any, response should be sought by the local planning authority within the present policy environment.

Hampshire Fire & Rescue

Description of Works:

HFRS understands that the project involves Part-demolition of Building 1000 and associated works; the erection of new flexible use industrial units; and a new parking layout with associated works to layout and access

I confirm that Hampshire Fire and Rescue Service (HFRS) has received your application, dated 13 August 2019. The inspector named above has considered the information provided and has made the following comments:

Building Regulations: Access for Firefighting

Access and facilities for Fire Service Appliances and Firefighters should be in accordance with Approved Document B5 of the current Building Regulations.

Hampshire Act 1983 Section 12 - Access for Fire Service

Access to the proposed site should be in accordance with Hampshire Act 1983 Sect, 12 (Access to buildings within the site will be dealt with as part of the building regulations application at a later stage). Access roads to the site should be in accordance with Approved Document B5 of the current Building Regulations.

Fire and Rescue Services Act 2004

The following recommendations are advisory only and do not form part of any current legal requirement of this Authority.

Access for High-reach Appliances

High reach appliances currently operated by the HFRS exceed the maximum

requirements given in Section 17 of the Approved Document B. When considering high rise buildings these variations should be considered as additions and incorporated as follows. Structures such as bridges, which a high-reach appliance may need to cross should have a maximum carrying capacity of 26 tonnes. Where the operation of a high reach vehicle is envisaged, a road or hard standing is required 6m wide. In addition, the road or hard standing needs to be positioned so that its nearer edge is not less than 3m from the face of the building.

Water Supplies

Additional water supplies for fire fighting may be necessary. You should contact the Community Response Support, Hampshire Fire and Rescue Headquarters, Leigh Road, Eastleigh, S050 9SJ (risk.information@hantsfire.gov.uk) to discuss your proposals.

Fire Protection

HFRS would strongly recommend that consideration is given to installation of an Automatic Water Fire Suppression Systems (AWFSS) to promote life safety and property protection within the premises.

HFRS is fully committed to promoting Fire Protection Systems for both business and domestic premises. Support is offered to assist all in achieving a reduction of loss of life and the impact of fire on the wider community.

Testing of Fire Safety Systems

HFRS strongly recommends that, upon commissioning, all fire safety systems are fully justified, fully tested and shown to be working as designed. Thereafter, their effectiveness should be reconfirmed periodically throughout their working lifecycles.

Fire-fighting and the Environment

Should a serious unsuppressed fire occur on the premises, the water environment may become polluted with 'fire water run-off' that may include foam. The Service will liaise with the Environment Agency at any incident where they are in attendance and under certain circumstances, where there is a serious risk to the environment, a 'controlled burn' may take place. This of course could lead to the total loss of the building and its contents.

Premises' occupiers have a duty to prevent and mitigate damage to the water environment from 'fire water run off' and other spillages.

Timber-framed Buildings

These types of buildings are particularly vulnerable to severe fire damage and fire spread during the construction phase.

The UK Timber Frame Association publication '16 Steps to Fire Safety on Timber Frame Construction Sites' provides guidance on this issue and is available from: <https://ttf.co.uk/download/16-steps-fire-safety-timber-frame-construction-sites/>

This guidance should be read in conjunction with the 'Joint Code of Practice on the Protection from Fire of Construction Sites and Buildings Undergoing Renovation', published by the Construction Confederation and The Fire Protection Association (Sixth Edition, ISBN 1-902790-33-2)

Copies of the 'Joint Codes of Practice' and useful sister publication, 'Construction Site Fire Prevention Checklist' (Second edition, ISBN 1-902790-32-4), are available for purchase from the Fire Protection Association: (www.thefpa.co.uk) and from the

Hampshire Highways

Final Comments:

Further to the Highway Authority's latest response dated 17th February 2020, the applicant has submitted a further technical note to address the outstanding comments which have been raised. These matters are as follows and addressed below.

- Confirmation that a contribution will be provided towards the upgrade of Footpath 51 ;
- Widening of the proposed footpath through the development to cater for cyclists
- Engagement with the Highway Authority regarding a contribution towards bus infrastructure;
- Commitment to a clause in the S106 agreement which ensures the proposed traffic barriers will operate during the hours set out by the applicant;
- Updates to the model files as per the above; and
- Investigation into an improvement scheme to the Langstone Road site access junction.

Sustainable Transport Improvements

Bus

Further discussions have been held with the applicant to upgrade both the northbound and southbound bus waiting facilities serving the development on Langstone Road. It has been agreed that a contribution of £25,000 will be secured through the s106 agreement towards the upgrade of this infrastructure.

Walking and Cycling

To improve pedestrian and cycle connections through the development, the applicant has agreed to pay a contribution of £67,500 towards the upgrade of the northern section of Footpath 51, between the site access road and the A27. The upgrade will include the tarmacking of the surface of this section of the path and widening it to 2.5m to ensure it is available as an all year pedestrian and cycle connection between the site and Solent Road.

At the point which Footpath 51 meets the site access road, appropriate signage will be provided which directs pedestrians and cyclists onto the existing shared use facilities on Langstone Road. The upgrade of the footpath will also feature the widening of the northern connection into the car park to serve as an additional connection into the development. This will be secured via a s106 obligation.

Internal Traffic Movements

The applicant has provided clarification with regards to the operation of the traffic barriers proposed within the site which will restrict the east to west movement of vehicles between 7:30am - 9:00am. This will encourage motorists to utilise the western access into the site from Harts Farm Way, taking traffic away from the Langstone Road site access. 29% of parking will

be available from the western access only to further consolidate this arrangement. Commensurate with the above, traffic modelling has been undertaken for both the Harts Farm Way roundabout and Langstone Road site access junction which is covered below.

To restrict the movement of HGVs through the site, the internal layout has been designed to physically constrain these movements. Given the location of the new employment buildings to the west of the site, HGVs will need to utilise the Harts Farm Way roundabout into the site to access these buildings. A low level of HGV usage will be observed through the Langstone Road site access to service the existing office buildings, reflecting the current arrangement.

Langbrook Close U- Turning

Issues have previously been raised with motorists u-turning in an existing residential cul-de-sac access off Langstone Road. This is partially caused by vehicles insufficiently anticipating the turning into the development, immediately off the A27 roundabout, and having to u-turn at the next available junction.

To address this matter and reduce the number of u-turning vehicles, the applicant has agreed to amend the white lining at the back of the right turn lane when heading southbound from the A27 roundabout. By removing the surplus white lining, additional capacity in the right turn lane will be provided, providing additional space for motorists to wait should there be a queue of vehicles waiting to access the site. This will be supplemented with additional signing at the A27 roundabout to inform motorists of the immediate turn into the site.

Junction Modelling

Updated junction modelling has been undertaken by the applicant to address the comments raised in the Highway Authority's previous response. The latest models files are reviewed below.

Harts Farm Way Roundabout

Previous comments were raised with regards to potential unequal lane usage at the roundabout. The latest model notes unequal lane usage on the Brockhampton Road approach, owing to a reduced number of vehicles turning left using the nearside lane. This is addressed by modelling this arm of the roundabout as only far-side lane with a provision of a bypass for left turning traffic. This is now considered acceptable due to the reduced volume of left turning traffic.

Unequal lane usage has also been noted on the Harts Farm Way approach. A sensitivity test has been undertaken which models the arm with a far-side only approach (mirroring the Brockhampton Road model), showing similar results as the previous model. As such, this matter is also now acceptable. A sensitivity test has been undertaken for the Harts Farm Way roundabout to ascertain how the junction will operate with additional vehicular trips using the western site access as a result of the internal barriers controlling traffic flow through the site. Across both the B8 and B1c re-development scenarios (modelled to a future year of 2024) junction performance will be very similar, with the biggest delays noted on the Brockhampton Road arm (RFC value of 0.83) and Harts Farm Way arm (RFC value of 0.74). However, these approaches will still be operating within capacity and are therefore considered

acceptable.

Langstone Road Site Access

Amendments to the LinSig model used to model the right turn lane into the site have been made to correctly factor the distance between the right turn lane and upstream signals at the roundabout. The discharge of vehicles from these signals has also been factored into the model to reflect the current situation on the ground.

As noted above, the applicant is proposing traffic flow barriers within the site which will reduce the number of movements into the site from Langstone Road, along with providing additional right turn lane capacity and signage at the roundabout. The mitigation measures being proposed as part of this development are considered acceptable for mitigating future development impact at this access.

Recommendation

The additional information suitably addresses all outstanding Highway matters relating to this application.

Therefore, the Highway Authority raises no objection to the application, subject to securing the following:

S106 Obligations

- . Payment of the £67,500 contribution towards the upgrade of Footpath 51 prior to commencement of development;
- . Provision of appropriate signage to tie the upgrade Footpath 51 to the existing shared use facilities on Langstone Road with details of the signage requirements to be agreed prior to occupation;
- . Payment of the £25,000 contribution towards the bus infrastructure upgrade prior to occupation of development;
- . Langstone Road right turn lane works and additional signage at the roundabout to be implemented prior to occupation of development;
- . Payment (by developer) of HCC fees in respect of approval (£1,500) and monitoring (£15,000) of the Framework Travel Plan prior to occupation; and
- . Provision of a bond, or other form of financial surety, in respect of measures within the Travel Plan prior to occupation.

Conditions

- . A Construction Traffic Management Plan shall be submitted to, and approved in writing, by the Local Planning Authority (in consultation with Hampshire County Council Highway Authority) before development commences. This should include construction traffic routes and their management and control, parking and turning provision to be made on site, measures to prevent mud being deposited on the highway, adequate provision for addressing any abnormal wear and tear to the highway, and a programme for construction.

Reason:

In the interest of highway safety

. No development hereby permitted shall be occupied until a Management Plan for the proposed traffic barriers within the site has been submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented before any part of the development hereby permitted is occupied and retained in perpetuity.

Reason:

In the interests of highway safety and operation.

Further Comments

Thank you for re-consultation on the above planning application. Further to the Highway Authority's response dated 11th September 2019, the applicant has submitted a response note to address the outstanding matters raised. The points raised within this note are addressed below.

Personal Injury Accident Data

Updated Personal Injury Accident (PIA) data has been provided up until 31st March 2019. The updated data identifies 3 further accidents on top of the 22 incidents identified within the study area in the previous Transport Assessment (TA).

The accident data has been reviewed and it is noted that there are no accident clusters prevalent across the study area. It is therefore acknowledged that this development will not exacerbate any existing safety issues on the network.

Sustainable Transport

Walking and Cycling

Works to upgrade Footpath 51 have previously been undertaken to the north and south of the technology path given its use as a utility link. However, further works are required to the surfacing of the path to improve the drainage and reduce the levels of standing water. In doing so, this will help to ensure that the route is available all year round as a pedestrian and cycle connection to the north and south of the site, serving the additional number of employees that will be generated by the re-development of the park. The Highway Authority therefore maintains that a contribution is required towards the upgrade of the footpath to ensure it is available as a walking/cycling route all year round.

Drawing number 20428-04 Rev B details a walking route branching off Footpath 51, travelling to the east of the proposed car park through the site. To accommodate for cyclists as well and pedestrians, the route should be provided to at least a 2.5m width to Penner Road to provide continuous pedestrian/cycle access through the development.

Bus

Within the Highway Authority's previous response, the applicant was asked to investigate the existing bus stop facilities in the vicinity of the site and whether these facilities could be improved to increase the uptake of sustainable transport from the site.

The northbound stop includes a shelter with a flagpole and timetable details. The southbound stops consists of a simple flagpole and timetable details. Given the

potential to encourage the uptake of bus travel from the site, the applicant should liaise with the Highway Authority regarding the provision of a proportionate contribution towards upgrades to these stops, featuring an additional shelter and inclusion of Real Time Information (RTI).

Proposed Development

It is noted that the existing on site gym is proposed to be relocated as part of the redevelopment of the business park. The size of the gym is expected to decrease upon relocation and is currently understood to serve the wider public, rather than employees of the business park specifically. For this reason, it is not anticipated that there will be any new trips generated by the newly located gym.

Dimensions have now been provided for the parking bays, confirming that each space will be 2.4m wide and 4.95m in length which is suitable when considered against Havant Borough Council's (HBC's) Supplementary Planning Document for parking. A 1.8% increase in the number of parking bays is proposed following the redevelopment, in line with the re-allocated land use. The level of parking provision provided by the development is ultimately for HBC to comment on as the parking authority.

The updated bund profile has been reviewed and is now considered acceptable.

Internal Site layout

An updated walking and cycling routes drawing has been provided (drawing number 20428-04 Rev 8) which details some amendments to the pedestrian provision through the site. Comments on the pedestrian and cyclist provision within the development have been provided above.

The updated site layout plan (0152 Rev N) features the provision of traffic barriers to control traffic movements during certain times of the day. This point is addressed below.

HGV Movements

The surveys undertaken on-site indicate that 46 HGV movements are generated by the park every day. A pro-rata increase of this number suggests that 70 HGV movements would be generated by the site when at full occupancy. The current on-site 88 land use (data centre) generates less HGV movements than predicted by the TRICS assessment. However, given the potential for the current occupiers to change, especially following the re- development, a worst-case scenario should be assumed to include the potential that the B8 land use reverts back to the forecast warehouse function.

Following the re-development, the HGV trip generation varies across the proposed scenarios. These scenarios are summarised in the table below:

Development Scenario	Daily HGV Trip Generation	Percentage Increase
B1c (assuming current B8 usage)	103%	124%
B8 (assuming current B8 usage)	200%	335%
B1c (assuming warehouse usage)	170%	270%
B8 (assuming warehouse usage)	267%	480%

usage)		
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Depending on which re-development scenario is eventually adopted, there will be at least a 124% increase in the number of daily HGV movements to and from the technology park. The surveys indicate that 61 % of HGV's routeing to the site will do so from the west, whilst the remaining 39% will route via the eastern access. The Highway Authority previously raised concerns with the management of this arrangement to prevent additional HGVs using the Langstone Road access above those indicated in the distribution assignment, especially given the proposed increase in the number of daily HGV movements.

To address this concern, drawing number 0155 Rev E has been produced, detailing a traffic management strategy for the park. This features the provision of two access barriers which restricts access into the centre and northern section of the technology park when approaching from the western access. It is understood that the barriers will operate between 7:30 - 9:00 and will restrict the west-east flow through the park. The barrier would prevent additional vehicles approaching from the western access and travelling through the park before egressing the site through the eastern access onto Langstone Road. With the barriers in place, the parking provision will be available as follows:

- . 100% of parking available from the west;
- . 29% of this parking will be available from the west only; and
- . The remainder will be accessible from both the east and west.

Whilst the above proposal appears sufficient for managing the movement of HGVs through the park, the proposed traffic management will remain private, meaning there is no guarantee that the barriers will operate within the proposed timeframe. The applicant should commit to an obligation within the S 106 agreement which would set the working hours for the operation of the barriers. Confirmation is also required as to how HGV drivers will be made aware of this arrangement, including the restricted access to the park from the east. This will prevent trips to the park incorrectly being made through the eastern access.

Langbrook Close U-Turning

To reduce the number of motorists u-turning in Langbrook Close to access the business park, the applicant is proposing to erect signage to improve driver awareness of the junction immediately south of the A27 roundabout and also ban u-turning movements within the junction.

Whilst the proposal to ban the u-turning movement is noted, this requires enforcement by the police who would need to monitor these daily movements. Should this be unachievable, motorists will continue to undertake this manoeuvre. However, the Highway Authority has identified alternative measures, which includes the scope to improve the signage to the technology park to increase driver awareness of the right turn lane coming off the roundabout.

To further improve access into the park from Langstone Road, the applicant should also investigate the shortening of the existing length of central hatching from the roundabout to provide a longer right turn lane into the site whilst still complying with DMRB CD116. This lining and signing scheme would allow

motorists to better anticipate the presence of the right turn lane and any potential vehicles queuing to turn into the site. As such, the applicant should engage with the Highway Authority regarding the provision of improved signage and the shortening of the central hatching from the A27 roundabout.

Junction Modelling

The Highway Authority raised a number of comments about the junction modelling which was undertaken by the applicant in the original TA. The TN comments on the concerns raised in the HA's initial response. The junction model files have also been provided for review.

Langstone Road Site Access

To model the site access junction with Langstone Road, the applicant has built a Junctions 9 model. The access road is modelled as two lanes which is considered acceptable. Likewise, the 3.25m lane width used within the model is inline with CAD measurements and is therefore considered acceptable as well. The model has been re-run with these parameters and it is noted that the results reported in the TA for the AM and PM peak hour for different scenarios do not match the model results.

A simplified LinSig model has been developed to model the right turn arrangement into the site. Only the right turn lane on Langstone Road has been modelled giving way to the Langstone Road northbound traffic. The LinSig modelling approach used for the right turn lane is considered acceptable; however, the model has been re-run and it is noted that the results in the TA differ from those provided in the model.

Minor amendments are required to the model to confirm its acceptability. The signal control needs to be provided at a correct distance of approximately 150m and the green signal stage which discharges vehicles to the right turn lane needs to be updated to two instances replicating the traffic platooning from the southbound roundabout stop-line and A27 EB off-slip stop-line.

Harts Farm Way Roundabout

The geometric parameters have been checked inline with CAD measurements and these are deemed acceptable, except from the South moor Lane approach which appears to have been over-estimated which could be a result of the cycle lane markings near the kerb not being considered. A sensitivity test has been performed with the correct road width which suggests only a marginal increase in delay as a result.

Traffic flow data has not been provided for the roundabout. Based on the model flows, there is a likelihood of unequal lane usage at Brockhampton Road and Harts Farm Way in the AM peak and only at Brockhampton Road in the PM peak. This is due to the lane markings which suggests that only left turners can use the flare lane, which is comparatively low in numbers than the sum of ahead and right turning traffic which would be using the far-side lane. The potential unequal lane usage should be checked and potentially re-run with the correct intercept corrections should this be required.

Junction Model Results

Whilst there are a few matters which need to be addressed before the model files can be considered acceptable, the Highway Authority has reviewed the model outputs provided within the original Transport Assessment.

The Harts Farm Way roundabout and Langstone Road access have been modelled under the following scenarios:

- . Existing Layout (70% Occupancy);
- . Existing Layout (100% Occupancy);
- . Proposed Re-Development - B1 C Scenario; and
- . Proposed Re-Development - B8 Scenario.

The applicant has provided information from the estate management team which clarifies that occupancy of the technology park began to decrease around February 2018. Since the decline, occupancy levels have sat around 70%. The applicant has therefore modelled the existing situation (70%) and carried out a pro-rata increase of the vehicular flows to understand the situation at 100% occupation. The outputs from the two junction assessments are assessed below.

Harts Farm Way Roundabout

Under the 2019 modelling scenarios noted above, the Harts Farm Way Roundabout operates within capacity across all approaches. In the AM peak hour of the 70% occupancy scenario, the busiest arm of the junction is the Harts Farm Way approach, operating at a Ratio to Flow Capacity (RFC) of 0.60 in the AM peak hour. When factored up to 100% occupancy, the RFC of this arm of the roundabout marginally increases to 0.66 in the AM peak. Following the re-development, the RFC decreases to 0.65 (81c Scenario) and 0.64 (88 Scenario).

When assessed to a future year of 2024, the junction is still modelled to operate within practical capacity. The Harts Farm Way roundabout is therefore considered suitable for accommodating the proposed re-development.

Langstone Road Site Access

To understand the future operation of the site access junction with Langstone Road, modelling has also been undertaken to 2024 under the aforementioned scenarios.

Under the current 2019, 70% occupancy scenario, the left turn movement out of the site access operates at an RFC of 0.70 in the PM peak hour. Uplifting this assessment to 100% occupancy increases the RFC of the approach to 1.06. The right turn movement from Langstone Road into the development is also approaching capacity in the AM peak, with an RFC of 0.89. Following the proposed redevelopment, the junction is still forecast to operate over capacity on the site access left turn movement in the PM peak hour, with an RFC of 1.01 and 0.98 under the 81c and 88 scenarios respectively. The right turn into the site from Langstone Road is also proposed to operate at respective RFCs of 0.89 and 0.87 and is therefore over practical design capacity.

The redevelopment scenarios have been modelled to a 2024 future year scenario. Under this assessment both the 81 c (RFC of 1.04) and 88 (RFC of 1.01) scenarios operate over capacity on the left turn out of the access in the PM peak. The Langstone Road right turn movement into the site also experiences worsening capacity, with respective RFCs of 0.93 and 0.91 across the two scenarios. It is therefore noted that the junction will operate over capacity under both of the redevelopment scenarios. A summary of the relevant scenarios and the junction approaches close to or over capacity are

summarised in Tables 1 and 2 below.

Table 1 - Langstone Road Site Access Operational (2019)

Development Scenario	Site Access Left Turn (AM)	Site Access Left Turn (PM)	Langstone Road Right Turn (AM)	Langstone Road Right Turn (PM)
Existing 70% occupancy	0.09	0.70	0.71	0.11
Existing 100% occupancy	0.15	1.06	0.94	0.11
B1c Redevelopment Scenario	0.14	1.01	0.89	0.11
B8 Redevelopment Scenario	0.14	0.98	0.87	0.11

Table 2 - Langstone Road Site Access Operation (2024)

Development Scenario	Site Access Left Turn (AM)	Site Access Left Turn (PM)	Langstone Road Right Turn (AM)	Langstone Road Right Turn (PM)
B1c Redevelopment Scenario	0.15	1.04	0.93	0.11
B8 Redevelopment Scenario	0.15	1.01	0.91	0.11

Currently, no mitigation proposals have been put forward by the applicant to ensure that the access onto Langstone Road will operate within design capacity once the site reaches 100% occupancy under either of the redevelopment scenarios. Given that the proposed redevelopment scenarios will increase the level of flow through the junction, tipping it over capacity under the scenarios modelled above, the applicant should identify an improvement scheme to mitigate the impact of the development.

Travel Plan

An updated Travel Plan has been provided to address the comments raised within the Highway Authority's previous response. The latest revision of the TP has been reviewed and considered acceptable. The TP approval fee, monitoring fee and cash deposit should be secured within the S 106 agreement.

Recommendation

The Highway Authority requires further information to address a number of remaining concerns with the application:

- . Confirmation that a contribution will be provided towards the upgrade of Footpath 51;
- . Widening of the proposed footpath through the development to cater for cyclists
- . Engagement with the Highway Authority regarding a contribution

towards bus infrastructure;

- . Commitment to a clause in the S1 06 agreement which ensures the proposed traffic barriers will operate during the hours set out by the applicant;
- . Updates to the model files as per the above; and
- . Investigation into an improvement scheme to the Langstone Road site access junction.

Hampshire Highways – Original Comments

Following pre-application discussions with the Highway Authority, a Transport Assessment (TA) has been submitted by the applicant. The following letter addresses the matters covered within this assessment.

Existing Conditions

Langstone Technology Park currently consists of 58,412m of floor space, split between the following land uses:

Land Use	Floor Space (m2)
B1a Offices	41,155
B1b Labs	3,647
B1c/B2 Industrial	5,868
Data Centre/B8	5,568
Gym	335
Nursery/Creche	288
Plant	1,551

In support of these land uses, 1,854 car parking spaces are provided onsite. The TA states that occupancy of the site has declined over the years, with 70% of the employment space currently occupied.

The Park can currently be reached via 2 vehicular access points: either by heading east at the Harts Farm Way/Brockhampton Road Roundabout or from Langstone Road, with the access situated approximately 150m south from the westbound on-slip onto the A27. The park sits to the north of Hayling Island and to the south of Havant town centre and the rail station.

ATC surveys have been undertaken at both site accesses across a 7 -day period to understand existing traffic conditions in and out of the site. Manual Classified Turning Counts (MCC's) were also undertaken to classify vehicle type and the level of queuing present. Further surveys were undertaken at Woodbury Avenue and Langbrook Close to observe the number of U-turners at these locations. The results of these surveys are discussed within this response.

An existing Premier Inn and Carvery share access from Langstone Road, with approximately 10% of traffic movement from the hotel and public house occurring into or out of the park (based on the surveyed vehicle movements).

Personal Injury Accident Data

Personal Injury Accident (PIA) data has been obtained between 01/01/14-31/12/18. It is noted that this accident data is out of date and should be updated to provide the most recent report on road accidents in the area

Sustainable Access

Bus Provision

The nearest bus stops to the site are located on Langstone Road, approximately a 500m walk from the site. Bus services 30 and 31 are available at these locations, providing access northbound into Havant town centre and southbound into Hayling Island every 20 minutes.

The facilities at the southbound stop consist of a simple flagpole and information panel, while the northbound stop benefits from a bus shelter. Through pre-application discussions, the Highway Authority requested that improvements to the bus stops were investigated to increase the uptake of sustainable travel from the site. The TA does not review the existing facilities nor make reference to any potential improvements. The Highway Authority therefore request that improvements to bus facilities are investigated.

Rail Provision

Havant train station presents the closest form of rail travel from the development, approximately 1 km to the north near to Havant town centre. The station offers regular journeys to a number of destinations and as such this represents a viable alternative for commuter travel to the park on a regular basis, should an attractive walking and cycling route be available between the site and the rail station.

Walking and Cycling

The TA has identified that the primary desire line to and from the site is towards Havant town centre. Footpath 51 provides a connection towards the town centre, connecting the north eastern boundary of the site to So lent Road where pedestrian crossing facilities are provided. The route connects the site to Havant bus and rail station along with the Tesco store and other amenities in Havant.

Through pre-application discussions, it was agreed that a walking/cycling audit should be undertaken from the site to key local facilities. The importance of Footpath 51 for encouraging sustainable transport was identified at this stage, with the Highway Authority requesting that the internal layout should be designed help to promote the route.

An audit has been undertaken, stating that the route is of a "high standard, with comprehensive coverage, with no evident deficiencies". The Highway Authority does not agree with this view and has since reviewed the status of the path. The path is low lying and is overlapped by the river in the winter months, requiring surfacing and revetment to ensure the path is available all year round. A contribution will therefore be sought towards the improvement of this footpath.

Proposed Development

The redevelopment of Langstone Technology Park consists of the following changes:

- . The part demolition of building 1000, installation of a new flank elevation and erection of a car parking area;
- . A new elevation for building 4000;
- . Demolition of the existing gym;
- . The erection of new buildings, comprising a combined area of 12,575m² in flexible 81c, 82 and 88 use, with associated parking; and
- . Replacement car parking areas for retained/refurbished buildings.

The following table presents the new proposed floor space compared against the existing land use:

Land Use	Existing Space (m2)	Proposed Space (m2)
B1a Officer	41,155	39,233
B1b Labs	3,647	2,183
B1/B2 Industry	5,868	2,302
B8	5,568	5,568
New B1c, B2, B8	-	12,575
Nursery/Creche	288	288
Plant	1,551	1,551
Total	58,077	63,700

As demonstrated in the table above, the proposed redevelopment increases the total floor space being utilised within the park. Following the new floor space scenario, the proposed number of car parking spaces will increase from 1854 to 1888 - an increase of 34 spaces.

The current creche/nursery facilities will be maintained on-site, while the gym is to be relocated. During pre-application discussions, the Highway Authority requested further details as to how the gym is proposed to operate, and whether it would be open to external users for regular classes. Should the gym be open to the general public, the anticipated trip rate will need to be considered, approved and applied to the junction modelling undertaken within the T A. Confirmation is also required that the relocated gym will be of the same size as the current gym (335m2).

Onsite Car & Cycle Parking Provision

As the parking authority, the level of car and cycling provision onsite is a matter for Havant Borough Council to review. However, given the proposed increase in the scale of the park and the potential impact on overspill parking, the Highway Authority have reviewed parking proposal plans 0155 Rev Band 0156 Rev B and have the following comments to make.

No dimensions have been included on the drawing detailing the size of the parking bays. Confirmation is therefore required that the bays and aisle widths meet the minimum standards. It is noted that there is an overall increase in the number of parking spaces on site, facilitating a greater number of staff onsite at any given time. The number of spaces provided should comply with the new floor space provision to ensure no overspill parking takes place within the highway.

Drawing number 0155 section A-A shows that vehicle overhang is not accommodated. A minimum 600mm width verge should be provided. In addition, the new slope is too steep, it is suggested that the existing slope is replicated to provide a gentle gradient.

Internal Site Layout

It is understood that the roads and footways relating to this application are not being offered for adoption by the developer. HCC would not object to the proposals. However, it would be advisable that the developer ensures that the roads and footways are designed to minimum industry standards and / or Hampshire County Council's best practice as set out in <https://www.hants.gov.uk/transport/developers/constructionstandards> , and

that an appropriate Private Management Plan is put in place to deal with any future issues. Having reviewed plans however, the following comments are made:

A continuous shared use path should be provided from the new units located in the south western corner of the park to Footpath 51 to ensure a complete route is provided to the redeveloped area.

It is noted that only Units 6000 and 7000 are proposed to be serviced from Langstone Road. To understand how this will compare against the current number of HGVs using the Langstone Road access and the Harts Farm Way/Brockhampton Road access, the Highway Authority requests that an assessment is undertaken to compare the current number of HGVs movement against the expected number of movements following the redevelopment utilising these two access points. The internal site layout is not considered sufficient for discouraging HGV usage of the Langstone Road access alone. Further consideration should be given towards reducing HGV movements through the Langstone site access.

Trip Generation

Existing Traffic Conditions

As an existing employment site, Langstone Technology Park currently generates vehicular trips through the movement of employees and HGV's visiting the site on a daily basis. The TA states that around 70% of the floor space within the site is occupied but does not specify the origin of this data. The Highway Authority requests that further detail is provided to evidence the current level of occupation and also requests historic occupation levels going back at least 5 years.

To calculate the existing trip generation for the site, the TRICS database has been utilised to derive the trip rates for land uses B1a (office), B1b (labs), B1c/B2 (industrial) and a data centre building (B8 usage is assumed). Outputs have been provided for each of the land uses mentioned above for the AM and PM peak hours and for both vehicles and OGVs.

There is also a nursery onsite which is used both externally and by employees of the park. For robustness, trip rates have also been calculated for the nursery and considered new for inclusion within the overall traffic flows. As mentioned previously, further information is required regarding the relocated gym and whether this facility will be open to the public.

The trip rates provided have been reviewed and are considered acceptable. When considered against the land uses presented in the table above, existing flows to and from the park are 903 in the AM peak hour and 770 in the PM peak hour, with 12-hour flows of 6065. Total OGV traffic is 10 in the AM peak and 5 in the PM peak, or 118 across a 12-hour period. The ATCs undertaken within the site show there are currently 3,853 vehicle movements, suggesting that the site is currently operating at 64% occupancy.

Traffic Conditions Following Redevelopment

To forecast future traffic conditions following the redevelopment, different trip rate scenarios have been assessed. The first assumes 100% B1c/B2 land use, while the other assumes 100% B8 use. Within both scenarios, the likely number of OGV trips have also been calculated.

The total flows under the different scenarios are outlined in the table below:

	AM Peak	PM Peak	12 hour
Existing Site (Currently 70% Occupancy)	-	-	3,853
Existing Site (Assuming 100% Occupancy)	903	770	6065
New B1c/B2	868	741	5958
New B8	853	727	5806

The associated OGV movements under each scenario are also included below:

	AM Peak	PM Peak	12 hour
Existing Site (Assuming 100% Occupancy)	10	5	118
New B1c/B2	14	5	148
New B8	16	12	224

Whilst the flows vary across different scenarios, the applicant anticipates that there will be a nil-detriment impact on the highway network via the removal of office space and replacing this with industrial use, which is a less intensive trip generator. This assumption cannot be agreed without further confirmation on the use of the onsite gym and further background on the decline in occupancy.

Vehicular Distribution

To calculate the distribution of vehicles routing to and from the Park, an analysis of the 2011 Journey to Work Census data has been undertaken for MSOA Havant 014; this approach was agreed during pre-app. The analysis indicates that Havant is the greatest trip attractor with 37.2% of all driver trips, followed by Portsmouth with 23% of trips and Fareham at 7.6%. A split between each Havant ward has been provided to understand where Havant based trips originate from on a localised level.

The traffic surveys undertaken by the applicant have highlighted that there is a skew in the usage of the accesses, with the western access better utilised in the AM, and the eastern access utilised more in the PM. The surveys have also highlighted that usage of Langstone Road south was higher than anticipated by the MSOA data. As identified by the Highway Authority during pre-app discussions, a number of cars travel southbound from the A27/Langstone Roundabout and u-turn at the Woodbury Avenue/Langbrook Close junction to avoid the queue of right turning vehicles into the site.

To establish the number of motorists attempting to make this u-turn movement in the peak hours, video surveys have been undertaken. Whilst there is a level of daily variance in u-turn movements, it is evident that this action is commonplace to avoid the right turn queuing into the park. Further consideration should be given to potential measures that would reduce the number of u-turning movements.

Southmoor Road Through Traffic

The internal road network for Langstone Technology Park is private, as a result any routing through the site by the general public is discouraged. However, it is understood that the park is used as a through route when there are congestion problems at the A27 Langstone Roundabout.

While the internal road network will be altered to address the routing of HGV's, an indirect through route will still be provided through the car park.

Given the benefit the through route provides in aiding congestion issues on Hayling Island, the Highway Authority require that this route is provided and secured as part of this application. The through route should be secured via a suitable mechanism in perpetuity.

Junction Modelling

During pre-application discussions, the Highway Authority requested that the following junctions were modelled with traffic flows following the redevelopment:

- Langstone Road/Site Access;
- Brockhampton Road/Southmoor Road/Harts Farm Way Roundabout;
- and
- A27/Langstone Roundabout.

It is noted that junction modelling has been undertaken for Langstone Road/Site Access and Brockhampton Road/Southmoor Road/Harts Farm Way Roundabout but not for the A27/Langstone Roundabout. Junction modelling should be undertaken at this roundabout when considering the 4 scenarios assessed within the current TA.

To allow for a comprehensive review of the junction modelling undertaken to date, the Highway Authority requests that the model files for all 3 of the aforementioned junctions are provided to check that the relevant parameters are accurate. Detailed comments will be provided once these model files have been reviewed.

However, after an initial review of the outputs, it is noted that the model shows that there is little queuing and delay in and out of the site accesses, despite onsite observations showing high levels of queuing. It is unclear if the models have been calibrated to reflect the current situation on the ground.

Framework Travel Plan

To help encourage the uptake of sustainable travel from the site, a Framework Travel Plan has been submitted to HCC to review. Following a review of the TP, amendments to the document are required before it can be considered acceptable. Please find these requirements below:

Introduction

The introduction is concise and informative, but will require the following additional information before it is considered acceptable:

- Known planning applications I recent developments (where applicable) in the site's vicinity likely to have an impact on the redevelopment. This will aid the travel plan co-ordinator's ability to work with the local community to align outcomes.
- The developers view on travel planning I statement from the developer supporting the contents of the travel plan.

Policy and Guidance

It is noted that DETR's White Paper (1998), OfT's Good Practice Guidelines (2009), PPG (2014) and HCC's (2009) guidance are included within the policy and guidance section. In addition, it is advised to provide a short summary of the following:

- National Planning Policy Framework (2019)
- IHT's Guidelines for Providing Journeys on Foot (2000)

- . CIHT's Buses in Urban Developments (2018)
- . LPA I LHA parking standards (used to inform the on-site parking figure)
- . LPA I LHA electric vehicle SPD (where applicable)

Site Audit Existing

It is noted and welcomed that walking and cycling isochrones have been included within Figures 2 and 3. Useful facilities relevant to the site should also be added onto these maps. The following is a non-exhaustive list of potential facilities:

- . Bus stops
- . Railway stations
- . Leisure facilities
- . NCRs
- . Footpaths
- . Prominent retail facilities
- . Local healthcare facilities

The existing site assessment is good. In addition, there should be a brief description of Havant Train Station's infrastructure provision which may promote the use of more sustainable modes, including:

- . Cycle parking capacity I type
- . Waiting areas
- . Accessibility
- . Staffed hours

Site Audit Proposal

There is currently no information regarding the number of car parking spaces to be provided, or the type of on-site road layout to be implemented. It is understood that this is an outline application and subject to change, however, there should be a description of the site masterplan provided in Appendix A including the relevant guidance used to inform it.

There should be commitments to provide at the Full Travel Plan stage:

- . Operational hours
- . Visitor / delivery movements

Aims and Objectives

The aims and objectives are considered acceptable.

Targets

It is noted and welcomed that Census data has been used to inform the targets. However, a 5% reduction in SOV use is not considered SMART (Specific, Measurable, Achievable, Realistic, Timebound). It is recommended that a site of this description aims for a minimum reduction in SOV use of 10%.

We would also expect a short breakdown of how and why you think the modes will shift. For example; "we expect the carshare mode-share to increase by X% due to measure y". This will be used to assess the travel plan's success during monitoring and may provide insight into why certain aspects of the travel plan have worked well/poorly.

Measures

Currently the measures listed in sections 5 and 7 do not meet with our minimum standards. The following is a non-exhaustive list of additional measures we would expect to find in a travel plan for a site of this description:

Walking

- Potential improvements to (and maintenance of) the walking network and signage
- Provision of showers for the new build aspect of the development
- Promotion of free health apps (staff competitions etc.)

Cycling

- Potential improvements to (and maintenance of) the cycling network and signage
- Employers to consider the provision of interest free loans for the purchase of bicycles (up to £5,000 can be provided without tax implications)
- Cycle-to-work scheme
- Mileage allowances for cycle use
- Discussions with local cycling shops to organise potential discounts and offers

Public Transport

- Employers to consider the provision of interest free loans for the purchase of season tickets (up to £5,000 can be provided without tax implications)
- Discussions with the public transport operators in the area to organise potential service alterations, discounts and offers

Car Park Management

- Introduction of a management strategy
- Allocate priority parking spaces to car sharers
- Provision of electric vehicle charging points

Marketing and Promotion

- Provision of information through:
 - o Personal Travel Planning (PTP)
 - o Notice boards
 - o Team meeting agendas
 - o Newsletters
 - o Intranet
 - o Social media
- Information packs for new recruits
- Advertising the travel plan to staff through recruitment, e.g. how to get to the interview sustainably

Management Strategy

The current management strategy requires further clarification. For a site of this description, where there are multiple occupants and businesses on one site we would expect a management strategy similar to the following:

- A site-wide Travel Plan Co-ordinator (TPC) to be employed by the developer to oversee all the individual travel plans for each land parcel.
- Each individual parcel will also have a travel plan co-ordinator who conducts day-to-day travel planning activities through liaison with the overarching TPC.
- The starting date for each parcel of land will be first occupation (and the lease renewal date for existing parcels), with an annual monitoring report to be provided back to the overarching TPC once occupations have begun, and therefore to HCC for review.
- The site-wide TPC to be in place at least 3 months prior to first

occupation of the first parcel until 5 years post first occupation of the final land parcel.

In addition to the above, we would expect a breakdown of the cost for this site-wide TPC for the minimum five years of employment, to be included within the action plan.

Monitoring

The monitoring section will be considered acceptable with the clarification of when the baseline surveys will be conducted. Section 6.1.2 suggests upon occupation of each parcel whilst 6.1.3 suggests no earlier than 6 months post first occupation. For enterprise sites, where full occupation is generally achieved within a short period after opening, we would expect baseline surveys to be completed as soon as possible. These baseline survey results will be used to inform Year 1 monitoring. An example monitoring schedule can be found below:

	Baseline (Year 1)	Year 2	Year 3	Year 4	Year 5
Level of Report	To be submitted one year after occupation. This will include the baseline survey results found in the updated Full Travel Plan and a monitoring report	Monitoring Report	Full Surveys Monitoring Report	Monitoring Report	Full Survey Monitoring Report

Action Plan

All measures outlined in the travel plan should be referenced within the action plan and must include a start date, a due date and a cost estimate regardless of who the responsibility shall fall to. A non-exhaustive list of headings we expect to find within the action plan can be found below:

Objective Measure	Start Date	Due Date	Responsibility	Mode Affected	Cost Estimate	How to Measure Success
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Please note that the TPC role, surveys, vouchers and any other costs born from the travel plan (which are not part of the site's infrastructure or design) should be included within the action plan. These costs will be used to inform the travel plan cash deposit, to be finalised as part of the Section 106 agreement.

Enforcement

In addition to the description of the Section 106, there should be a commitment to pay HCC's monitoring and approval fees.

Recommendation

The Highway Authority require further information before a positive recommendation can be issued. To progress matters, the Highway Authority therefore requests the following information:

- . Up-to-date PIA data for the most recent 5-year period;
- . Investigation into bus stop improvements on Langstone Road;
- . Further discussions with HCC regarding improvements to Footpath 51;
- . Confirmation regarding how a route through the site for vehicular traffic will be provided in perpetuity;

- . Confirmation regarding the type of gym facility to be provided, and whether this will generate additional trips;
- . Confirmation as to how HGV access from Langstone Road will be discouraged;
- . Junction modelling for A27/Langstone Roundabout;
- . Provision of the model files for review;
- . Confirmation regarding calculation of current occupation levels and provision of historic occupation levels; and
- . Changes to the Travel Plan in line with the comments raised above.

Health and Safety Executive

Does not cross any Consultation Zones.

The proposed development site which you have identified does not currently lie within the consultation distance (CD) of a major hazard site or major accident hazard pipeline; therefore at present HSE does not need to be consulted on any developments on this site. However, should there be a delay submitting a planning application for the proposed development on this site, you may wish to approach HSE again to ensure that there have been no changes to CDs in this area in the intervening period.

This advice report has been generated using information supplied by Admin User at Havant District (8) on 26 March 2020.

Landscape Team, Havant Borough Council

Further Comments

From a landscape perspective we have the following comments in relation to this application:

Sustainable transportation provision and Layout

- We require a 3m wide hard surfaced shared cycle path connecting into the site west of Lavant Stream on footpath no. 51. Furthermore we would like to see signage for cyclists connecting them south onto Penner Road along the eastern boundary of the site.
- The provision and numbers of cycle storage location is unclear. We require clarity on the type of cycle storage facility and the number of bicycles that can be stored at each location. This should include elevation drawings and product specification.
- There seems to be insufficient footway provision to service the proposed industrial units on the south west of the site. The submitted site plan drawing no. 0110 (Rev C) does not clearly distinguish the footway provision, however as a minimum we require an off road footway that connects to all units. The footway will need to be a minimum width of 2m to allow 2 wheelchairs to safely pass and be DDA compliant.
- The pedestrian route connecting north Havant from the proposed new entrance is unclear. We require a defined off road route, which does not force users to walk through the car park. Again this will need to be a minimum of 2m with to allow 2 no. wheel chair users to pass.
- All car park search lanes need to be a minimum width of 6m (unless echelon) to afford sufficient room for vehicles to safely access/egress a parking bays.

- All disabled parking bays need to be designed as per BS8300.
- Site topography management - How and where will level changes occur (retaining structures or banks)? Can preliminary site levels or sections be demonstrated?

Soft landscaping

- We require areas of soft landscaping to break up the massing of hard surfacing within the curtilage of units 1-12, this should be a mixture of shrubs and trees to offer vertical form. An area of that size which is devoid of any planting is not deemed acceptable.
- A soft landscaping scheme which introduces tree planting to break up the massing of car parking throughout the site is required.

We require the following to be submitted for comment:

- A soft landscape scheme requiring submission of fully annotated plans at sufficient scale to identify species of individually planted trees, shrubs, hedges, marginal, bulbs and any areas of turfing / seeding. Planting areas should show the locations of different single species groups in relation to one another, and the locations of any individual specimen shrubs. Other information shall include plant specification schedules, comprising plant size, number and density.
- Hard landscape details requiring submission of fully annotated plans at sufficient scale that comprise the proposed range of coloured and textured surfacing treatments, which identify:
 - hard surfacing material type / product reference and colour
 - laying bond
 - edging or kerb detail / type
 - Further details on building material specification for the development requiring submission including material type, product reference and colour to understand how the proposed development will affect the existing streetscape.
 - Boundary details requiring submission of fully annotated plans at sufficient scale showing the locations of existing, retained and proposed new boundary treatments, with scaled elevation drawings to show height, design, materials, type and colour of proposed new.

Original Comments:

From a landscape perspective we have the following comments in relation to this application:

Sustainable transportation provision and Layout

- We require a 3m wide hard surfaced shared cycle path connecting into the site west of Lavant Stream on footpath no. 51. Furthermore we would like to see signage for cyclists connecting them south onto Penner Road along the eastern boundary of the site.
- The provision and numbers of cycle storage location is unclear. We require clarity on the type of cycle storage facility and the number of bicycles that can be stored at each location. This should include elevation drawings and product specification.
- There seems to be insufficient footway provision to service the proposed industrial units on the south west of the site. The submitted site plan drawing no. 0110 (Rev C) does not clearly distinguish the footway provision, however as a minimum we require

an off road footway that connects to all units. The footway will need to be a minimum width of 2m to allow 2 wheelchairs to safely pass and be DDA compliant.

- The pedestrian route connecting north Havant from the proposed new entrance is unclear. We require a defined off road route, which does not force users to walk through the car park. Again this will need to be a minimum of 2m with to allow 2 no. wheel chair users to pass.
- All car park search lanes need to be a minimum width of 6m (unless echelon) to afford sufficient room for vehicles to safely access/egress a parking bays.
- All disabled parking bays need to be designed as per BS8300.
- Site topography management - How and where will level changes occur (retaining structures or banks)? Can preliminary site levels or sections be demonstrated?

Soft landscaping

- We require areas of soft landscaping to break up the massing of hard surfacing within the curtilage of units 1-1, this should be a mixture of shrubs and trees to offer vertical form. An area of that size which is devoid of any planting is not deemed acceptable.
- A soft landscaping scheme which introduces tree planting to break up the massing of car parking throughout the site is required.

We require the following to be submitted for comment:

- A soft landscape scheme requiring submission of fully annotated plans at sufficient scale to identify species of individually planted trees, shrubs, hedges, marginal, bulbs and any areas of turfing / seeding. Planting areas should show the locations of different single species groups in relation to one another, and the locations of any individual specimen shrubs. Other information shall include plant specification schedules, comprising plant size, number and density.
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- Further details on building material specification for the development requiring submission including material type, product reference and colour to understand how the proposed development will affect the existing streetscape.
- Boundary details requiring submission of fully annotated plans at sufficient scale showing the locations of existing, retained and proposed new boundary treatments, with scaled elevation drawings to show height, design, materials, type and colour of proposed new.

Langstone Harbour Board

The Board's Planning Sub Committee has considered this application and has no objections to the proposals.

Local Lead Flood Authority HCC

Final Comments

Hampshire County Council as Lead Local Flood Authority has provided comments in relation to the above application in our role as statutory consultee on surface water drainage for major developments.

In order to assist applicants in providing the correct information to their Local Planning Authority for planning permission, Hampshire County Council has set

out the information it requires to provide a substantive response at <https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning>

The County Council has reviewed the following documents relating to the above application:

- DRAINAGE STRATEGY GENERAL ARRANGEMENT SHEETS 1 & 2; Job No. 8/1982; Drawing No. 4400; Revision P2; dated 17/10/2019.
- INDICATIVE DRAINAGE DETAILS SHEETS 1 & 2; Job No. 8/1982; Drawing No. 400410; Revision P1; dated: 18/10/2019.
- SUMMARY OF EXISTING SURFACE WATER DRAINAGE FOR PROPOSED DEVELOPMENT AREAS; Drawing No. 4600; Revision P1; dated: 25/10/2019.
- Calculation Package and Design Philosophy for Drainage; Ref: 8/1982; Revision B; dated: 25th October 2019.

Following our formal response to this planning application dated 20 August 2018, we received additional information on the 15 November 2019 including detailed hydraulic calculations together with the detailed drainage drawings. The additional information has addressed our previous concerns regarding surface water management and local flood risk.

Therefore, the County council as the Lead Local Flood Authority (LLFA) has no objection to the proposals.

We would also recommend that the applicant is directed to our website <http://www3.hants.gov.uk/flooding/hampshireflooding/drainagesystems.htm> for further information on recommended surface water drainage techniques.

Please note that Hampshire County Council as Lead Local Flood Authority will not comment on the fluvial systems as these are outside our remit.

Further Comments:

The have reviewed the following additional documents relating to the application:

. Clancy consulting letter; REF: 8/1982/LLFA; dated: 23rd September 2019.

We are aware of the application site characteristics and proposals. However, and since this is an application for full planning permission, at this stage the applicant should submit the detailed design of the surface water drainage, which should include the requested detailed drawings and hydraulic calculations, to demonstrate that the quantum of development and layout sought is deliverable, whilst ensuring that flood risk will not be increased on or offsite.

The detailed hydraulic calculations should include:

- Design and simulation criteria, network design and result tables.
- Manholes schedule tables.
- Summary of critical result by maximum level during the 1 in 1, 1 in 30 and 1 in 100 (plus 40% climate change allowance) rainfall events.

We require more detail (full drainage strategy) for full planning applications as the layout will be fixed, changes to the drainage strategy should be addressed before full permission is given to avoid unnecessarily restricting potential drainage design

solutions. Detailed drawings and hydraulic calculations are requirements of our surface water checklist for full planning application. Therefore, until the applicant has submitted the requested information, our formal response dated 2 October 2019 still stands.

Original Comments:

Hampshire County Council as Lead Local Flood Authority has provided comments in relation to the above application in our role as statutory consultee on surface water drainage for major developments.

In order to assist applicants in providing the correct information to their Local Planning Authority for planning permission, Hampshire County Council has set out the information it requires to provide a substantive response at <https://www.hants.gov.uk/landplanningandenvironment/landplanningandenvironment/flooding/planning>

The County Council has reviewed the following documents relating to the above application:

. Flood Risk Assessment and SUDS Strategy; Ref: 88/1982; dated 2nd July 2019.

We have reviewed the submitted information and request that the applicant provides additional information on the proposed surface water management strategy.

It is our understanding that surface water runoff from the proposed development areas will be managed through permeable, cellular tanks and oversized manholes/pipes. Furthermore, surface water will be discharged through the existing drainage strategy and discharge locations: Main River for areas 3 and 4, and existing surface water sewer for areas 1 and 2. While this is acceptable in principle, we still require the following information bearing in mind that this is a planning application for full planning permission.

We note that no hydraulic calculations have been submitted with the drainage layout. Bearing in mind that this is a full planning application, the applicant should submit detailed hydraulic calculations to show the expected performance of the proposed drainage system, including any drainage feature that will be used, for all rainfall events. This should demonstrate that the proposed drainage system can manage surface water runoff at the proposed discharge rates without increasing flood risk on or off site, considering existing and proposed catchments areas, flows and drainage features. Therefore, we request:

. Detailed hydraulic calculations for all rainfall events including those with a 1 in 100 (plus 40% climate change allowance) annual probability of occurrence. The hydraulic calculations should consider existing and proposed catchments areas, flows and drainage features and take into account the connectivity of the different drainage features, including discharge points. They should have the same reference for drainage features as the submitted drainage layout plan.

. Detailed drawings, detailed drainage layout plan showing the proposed drainage system, the catchment areas and referenced drainage features. This should include pipe runs, sizes, inverts/cover/bed levels, proposed catchment areas and gradients.

It is unclear from the information submitted by the applicant where area 2 is discharging surface water, and there is no information about the asset owner of that system. The drawing number 8/1982 states: contractor to investigate the final discharge point of the existing sewer S106 approval may be required to discharge area 2 into the sewer.

However, bearing in mind that this is a full planning application, at this stage the applicant should carry out the investigations, and submit agreements in principle with the asset owner for the proposed discharge rate and connection. We also require agreements in principle for discharge rates/connections for area 1 (Southern Water) and areas 3 & 4 (Environment Agency).

Please note that Hampshire County Council as Lead Local Flood Authority will not comment on the fluvial systems as these are outside our remit.

As a statutory consultee, the County Council has a duty to respond to consultations within 21 days. The 21 day period will not begin until we have received sufficient information to enable us to provide a meaningful response.

This is our first response to this consultation. If the above listed material is not supplied in full, a second response will be issued requesting the outstanding information. If the relevant documentation is not supplied following the second request, we will recommend that the planning application be refused on the grounds of insufficient information.

Mott MacDonald (Department of Transport)

No comments received

Natural England

No objection, subject to condition

Protected Sites

The application site is within 400m of the Chichester and Langstone Harbours SPA and Ramsar and Langstone Harbour SSSI, and within 700m of the Solent SAC. Due to the distance of the site from the sensitive habitats, the type of development proposal and the existing surrounding development acting as a noise and visual buffer, it is Natural England's opinion that the proposal is not likely to have a significant impact on the protected sites and associated species and therefore we have no objection to the proposal in regards to this aspect.

Biodiversity Mitigation and Enhancement

In order for your authority to be assured that the proposal meets the requirements of Natural England's standing advice and the additional requirements for biodiversity enhancement and net gain as set out in National Planning Policy Framework paragraphs 8,118,170,174 and 175d, Natural England recommends that the application is supported by a Biodiversity Mitigation and Enhancement Plan (BMEP), or equivalent, that has been agreed by a Hampshire County Council (HCC) Ecologist.

The submission of an HCC approved BMEP will help ensure your authority meets the requirements of Section 40 of the Natural Environment and Rural Communities Act (2006), which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or

enhancing a population or habitat'. Biodiversity 2020: A strategy for England's wildlife and ecosystem services and Making Space for Nature (2010) also provide strong drivers for the inclusion of biodiversity enhancements through the planning process.

Please note that provided the HCC Ecologist is satisfied with the submitted biodiversity mitigation and enhancement measures and the measures are secured by any permission then no further consultation with Natural England on this aspect of the proposal is required.

Open Space Society

No comments received

Planning Policy

Policy Status:

The Local Plan (Core Strategy) and the Local Plan (Allocations), together with the Hampshire Minerals and Waste Plan, provide the development plan for Havant Borough. The Pre-Submission Havant Borough Local Plan 2036 (HBLP 2036) was approved by the Council on 30 January 2019 and can be afforded limited weight.

The following policies are of particular relevance:

- . CS2 - Employment
- . CS14 - Efficient Use of Resources
- . CS16 - High Quality Design
- . CS17 - Concentration and Distribution of Development within the Urban Areas
- . CS19 - Effective Provision of Infrastructure
- . CS21 - Developer Requirements
- . DM10 - Pollution
- . DM14 - Car and Cycle Parking on Development (excluding residential)
- . AL2 - Urban Area Boundaries and Undeveloped Gaps between Settlements

In the Pre-submission Plan the following policies are of particular relevance:

- . KP6 Langstone Technology Park
- . DR1 Delivery of sustainable development
- . C1 Protection of existing employment sites
- . IN1 Effective provision of infrastructure
- . IN3 Transport and parking in new development
- . E1 High quality design
- . E3 Landscape and settlement boundaries
- . E12 Low carbon design
- . E22 Amenity and pollution

Principle of development:

The site lies within the urban area as defined by policies CS17 and AL2 in adopted local plan and proposed to be defined by Policy E3 in the emerging Local Plan. There is therefore a presumption in favour of sustainable development subject to other considerations.

Policy CS2 of the Core Strategy prioritises the use of previously developed land for the provision of new employment floorspace, whilst Policy DM2 seeks to safeguard existing employment sites from development proposals for non-employment uses.

Langstone Technology Park (LTP) is identified as a key project in the Pre-Submission Havant Borough Local Plan 2036 (HBLP 2036) to provide commercial development,

reinforcing its position as a key employment hub. Specifically, the original IBM plant at LTP is earmarked for modernisation and intensification of new industry, new technologies and low carbon options, particularly in the fields of digital, transport and communications.

The site is identified for comprehensive redevelopment under Policy KP6 in the Pre-Submission HBLP 2036, including new or converted B1, B2, and B8 floorspace together with supporting uses and infrastructure. The submitted Design and Access Statement includes a concept masterplan which identifies three proposed phases:

1. The part-demolition of Building 1000, installation of a new flank elevation to the east and a new elevation to the north of Building 4000. Refurbishment of bay 3 as office and provision of new I reconfigured.
2. Provision of new parking to maintain current parking numbers across the site.
3. Construction of 135,000 sq ft of industrial units and the access road.

The application form indicates the industrial units would provide 12,575 sq m of new employment floorspace. Though the redevelopment proposals include the part demolition of Building 1000, no information is provided with regard to the gross internal floorspace to be lost. Nevertheless, it is considered that the proposals would be likely to support the delivery of employment floorspace in line with emerging Policy DR1 of the Pre-Submission Draft Local Plan.

Whilst the smaller pockets of phased redevelopment and refurbishment are more modest than anticipated, there would be nothing to preclude a more comprehensive redevelopment coming forward on the site. As such, the application proposals are broadly supported by both adopted and emerging policy.

Minerals and Waste:

The western part of the site is in the Minerals Safeguarding Area as defined by the Hampshire Minerals and Waste Plan because it is likely to be underlain by sand and gravel. Criteria h. of Policy KP6 therefore expects opportunities for the prior extraction of minerals to have been explored. This is reinforced by the Minerals & Waste Safeguarding in Hampshire SPD which confirms that the LPA should consult Hampshire County Council as the total proposal area is over 3 hectares, though it is acknowledged that the development proposals relate to several small pockets of land within the same ownership. It is recommended that HCC are consulted, though it is acknowledged that the prior extraction may not be practicable.

Heritage:

The Site Constraints and Opportunities for KP6 in the HBLP 2036 highlight that "A request has been made for the former IBM building to be locally listed as a building of interest. The building may have some architectural value. " It is noted that the application proposals would affect Buildings 1000 and 4000 which are understood to have won the Financial Times Industrial Architecture Award in 1971 it is recommended the Council's Conservation Team are consulted on the application proposals accordingly.

Low carbon design:

Non-residential development over 500 sq. m is expected to meet the BREEAM 'Very Good' standard, unless proven to be financially or technically unviable in line with Policy CS14 of the adopted Core Strategy. Policy E12 of the emerging HBLP 2036 sets out the BREEAM level to be achieved for different floorspace thresholds for non-

residential development.

Proposals of 1,000 sq. m or more of non-residential development are expected to meet BREEAM 'Excellent'. The applicant has submitted BREEAM Pre-assessments for both the new build industrial units and the works to Building 1000, which outline the strategy for the proposals to achieve a minimum of a 'Very Good' rating in line with the requirements of Policy CS4. However, the new industrial floors space would create more than 1,000 sq. m and would therefore be expected to meet the higher rating of 'Excellent'.

The pre-assessment indicates that the development has an anticipated score of 60.5% but could potentially achieve a score of 66.9% - which would fall slightly short of 70% needed to achieve an 'Excellent' rating. Whilst the future occupiers of this building are not yet known, the emerging Plan requirement to achieve an 'Excellent' rating must be afforded limited weight. It is therefore recommended that the applicant further explore credits for the new industrial accommodation to achieve the 'Excellent' rating.

Going forwards, the relevant assessment should be submitted at the interim (design stage) and final (post completion stage) and secured through appropriate conditions to demonstrate how the requirements of the policy would be met. It would be perfectly acceptable for the applicant's consultants to contact the Council directly about this matter. Conditions would be required to secure this.

Parking:

Policy DM14 and the Havant Borough Parking SPD (July 2016) sets out the parking standards for new non-residential development in the borough. Specifically, in relation to the site, criteria f. of the emerging policy (KP6) in the HBLP 2036 highlights that sufficient parking should be provided in line with Policy IN3, and that requisite parking should be retained during any phased redevelopment or refurbishment of the site.

The submitted Transport Assessment indicates that a total of 287 car parking spaces, 46 long stay cycle spaces and 29 short stay parking spaces would be provided for the proposed new employment units based on the highest standard for Class B1c. As such, there would be a slight shortfall of long stay spaces (4) and a marginal surplus of short stay spaces (4), although the cycle parking requirements would be met within the development overall.

For the existing and refurbished units, the submitted Transport Assessment indicates a total of 1,888 car parking spaces would be provided, with 941 spaces lost through the new industrial accommodation but an additional 693 spaces would be provided. However, there is insufficient information about the existing and proposed floorspace for Units 1000 and 7000, and how this relates to the entire floorspace on site (58,412 sq. m).

Emerging Policy IN3 in the HBLP 2036 also expects a minimum of 10% of spaces to have Electric Vehicle charging points in commercial developments. Whilst there are currently 8 car parking spaces equipped with Tesla superchargers which will be retained, this would represent a very small percentage (0.04%) of the total parking proposed on site of 2.9% of the total parking proposed for the new industrial accommodation. As such, it is recommended that the applicant should provide new additional EV charging points in line with the emerging policy requirements.

Transport:

The emerging Local Plan is supported by two Transport Assessments (TA) - one covering the Borough's mainland areas using the Sub-Regional Transport Model

(SRTM) and one, more detailed, assessment covering Hayling Island and Langstone.

The Hayling Island TA assesses various mitigation scenarios through a Paramics Microsimulation model. It is the Council's intention to publish an addendum to the study which will further clarify the package(s) of mitigation measures needed to make the Local Plan development acceptable in planning terms. The publication of this would take place prior to the submission of the Local Plan to the Secretary of State, which is expected by Q4 this calendar year. On this basis, it is recommended that Hampshire County Council is consulted on the development proposals.

Summary:

Whilst the development proposals are more modest than envisaged in the Pre-Submission Local Plan, the refurbishment and redevelopment of the site would provide new high-quality employment floorspace within a key employment hub.

Further information is however required in terms of the proposed floorspace to be lost, refurbished and to be retained in order to make an accurate assessment of parking provision. Furthermore, it is recommended that further credits are explored to achieve a BREEAM 'Excellent' rating for the new industrial accommodation.

Property Services Manager

No comments received

Ramblers Association, South East Hants Group

The application will have little affect on footpaths Havant 50 and Havant 51. There is no objection to the application from the Ramblers Association viewpoint.

SE Hants Clinical Commissioning Group

South Eastern Hampshire Clinical Commissioning Group are primarily interested in residential developments where there is likely to be a direct impact on health provision in the local area.

The above application relates to a commercial development which would not have an impact on health provision. Therefore, we do not wish to make any further comment at this time.

SEEDA - (South East England Development Agency)

No comments received

Southern Electric

No comments received

Southern Water

Final Comment

Thank you for your email (including details of the applicants response to previous Southern Water consultation comments) of 01/04/2020 the contents of which I have summarized on the next page of this letter.

Given that the new development will result in a net reduction in flows discharged to the sewerage network, I am able to confirm that the following condition recommended in our previous consultation response of the 27th August 2019 is no longer required by Southern Water:

"Occupation of the development is to be phased and implemented to align with the delivery by Southern Water of any sewerage network reinforcement required to ensure that adequate waste water network capacity is available to adequately drain the development".

Foul Drainage

The proposed alterations to the site include the demolition of 5500m² of structure with the loss of floor space for 550 People.

The proposed development could generate the following:

The new development could generate the following:

B1 Offices 1:10 m²

B2/ B1(c) light industry 1:40 m²

B8 warehouse 1:70m²

Therefore;

Units 1- 5. B1 (c) = 92 people or as B8 = 68 people

Units 6 – 9 B1 (c) = 174 people or as B8 - 121 people

Units 10- 12. B1 (c) = 119 people or as B8.= 169 people

Total people = 385 maximum.

Therefore, the development is reducing the population by 165 people and subsequent foul flows. There should be no requirement for foul infrastructure reinforcement or phased development other than the demolition of the existing space before the new is created.

Further Comment

The comments in our response dated 06/12/2019 remain unchanged and valid for the amended details.

Further Comments:

The submitted drainage layout shows (GA-DRAN-4400-P1 & GA-DRAN-4401-P1) Geotextile permeable paving used for surface water connecting to public sewer which is satisfactory Southern Water.

All other comments in our response dated 27/08/2019 remain unchanged and valid for the amended details.

Original Comments:

Please find attached a plan of the sewer records showing the approximate position of a public sewers within the site. The exact position of the public sewers must be determined on site by the applicant before the layout of the proposed development is finalised.

Please note:

- The 750mm, 675mm and 600mm public foul and surface water sewers require a clearance of 4 meters on each side of the gravity sewers to protect it from construction works and to allow for future access for maintenance. No structures, development or tree planting will be permitted to be located within 4 meters of the external edge of the public gravity sewer without consent from Southern Water.

- No soakaways, swales, ponds, watercourses or any other surface water retaining or conveying features (including attenuation storage or tanked permeable paving should be located within 5 metres of public sewers.

- All existing infrastructure should be protected during the course of construction works.

In order to protect drainage apparatus, Southern Water requests that if consent is granted, a condition is attached to the planning permission. For example, "The developer must advise the local authority (in consultation with Southern Water) of the measures which will be undertaken to protect the public sewers, prior to the commencement of the development."

Furthermore, it is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.

Southern Water has undertaken a desk study of the impact that the additional foul sewerage flows from the proposed development will have on the existing public sewer network. This initial study indicates that there is an increased risk of flooding unless any required network reinforcement is provided by Southern Water. Any such network reinforcement will be part funded through the New Infrastructure Charge with the remainder funded through Southern Water's Capital Works programme. Southern Water and the Developer will need to work together in order to review if the delivery of our network reinforcement aligns with the proposed occupation of the development, as it will take time to design and deliver any such reinforcement.

Southern Water hence requests the following condition to be applied:

"Occupation of the development is to be phased and implemented to align with the delivery by Southern Water of any sewerage network reinforcement required to ensure that adequate waste water network capacity is available to adequately drain the development".

It may be possible for some initial dwellings to connect pending network reinforcement. Southern Water will review and advise on this following consideration of the development program and the extent of network reinforcement required. Southern Water will carry out detailed network modelling as part of this review which may require existing flows to be monitored. This will enable us to establish the extent of works required (If any) and to design such works in the most economic manner to satisfy the needs of existing and future customers.

Our assessment of the timescales needed to deliver network reinforcement will consider an allowance for the following:

- Initial feasibility, detail modelling and preliminary estimates
- Flow monitoring (If required)
- Detail design, including land negotiations
- Construction

The overall time required depends on the complexity of any scheme needed to provide network reinforcement. Southern Water will seek however to limit the timescales to a maximum of 24 months from a firm commitment by the developer to commence construction on site and provided that Planning approval has been granted.

The applicant should be advised that a wastewater grease trap should be provided on

the kitchen waste pipe or drain installed and maintained by the owner or operator of the premises.

The application contains a proposals that may produce trade effluent. The applicant should ensure that the Trade Effluent discharge license has been obtained, before the connection to the public sewerage network can be approved. Trade Effluent application process for non-household (NHH) customers has changed since April 2017. This was a governmental decision to open the Market to competition. In order to apply for a consent, you will need to engage with a Water Retailer and submit the application through them.

The disposal of surface water from this development should be in compliance with the following hierarchy of Part H3 of Building Regulations:

- a) An adequate soakaway or some other adequate infiltration system.
- b) A watercourse.
- c) Where neither of the above is practicable: a sewer.

Alternatively, the developer can discharge to public surface water sewers, surface water flow no greater than existing levels if proven to be connected and it is ensured that there is no overall increase in flows into the surface water system. You will be required to provide a topographical site survey and/or a CCTV survey showing the existing connection points, pipe sizes, gradients and calculations confirming the proposed surface water flow will be no greater than the existing contributing flows.

The Council's technical staff and the relevant authority for land drainage consent should comment on the adequacy of the proposals to discharge surface water to the local watercourse and via soakaways.

The planning application form makes reference to drainage using Sustainable Urban Drainage Systems (SUDS). Under current legislation and guidance SUDS rely upon facilities which are not adoptable by sewerage undertakers. Therefore, the applicant will need to ensure that arrangements exist for the long-term maintenance of the SUDS facilities. It is critical that the effective ness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SUDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SUDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

Submitted drainage drawing shows surface water from permeable paving being connected to public system which is not acceptable to Southern Water. The design of drainage should ensure that no land drainage or ground water is to enter public sewers network.

Land uses such as general hardstanding that may be subject to oil/petrol spillages should be drained by means of oil trap gullies or petrol/oil interceptors.

We request that should this application receive planning approval, the following condition is attached to the consent: "Construction of the development shall not commence until details of the proposed means of foul and surface water sewerage disposal have been submitted to, and approved in writing by, the Local Planning Authority in consultation with Southern Water."

Traffic Management, East Hampshire District Council

The Traffic Team have no adverse comment to make.

6 **Community Involvement**

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

Number of neighbour notification letters sent: 97

Number of site notices: 2

Statutory advertisement: 09/08/2019

Number of representations received: 8 objections including from Langstone Residents Association.

Comment	Officer Comment
Langstone Residents Association (further considerations): Whilst the Langstone Residents' Association and the Langstone Village Association maintains its concerns about this proposal, it is acknowledged the developer –Messrs Rapleys, in their letter dated 19 December 2019, intend introducing physical measures to limit vehicular access to the new industrial units and the northern car park during the peak AM period – between 7:30 and 9:00 to the western entrance. The developer's figures indicate this affecting 543 vehicles leaving the balance of up to 1342 vehicles able to use the eastern entrance, via the A3023 – Langstone Road, as well as the western entrance from Brookside Road. These controls are cautiously welcomed. However, the proposal will not solve the problem of traffic, choosing to use the eastern access, of having to cross the north bound lanes of Langstone Road causing queuing and consequent traffic congestion on the A3023 and beyond.	The impacts in relation to vehicular movements is considered in part 7 of this report. The use of the eastern access to Langstone Road and the western access to Brookside Road is considered in detail. The proposals limit the movements of HGVs and car movements from Langstone Road and the measures are considered to be satisfactory to the Highway Authority.

The Traffic Assessment, carried out as part of the Infrastructure Study to inform the work on the Local Plan 2036, highlights the problems of the A3023 and suggests a number of possible 'mitigation' measures. Among the 'ideas' is a proposal to ban right hand turns into Woodbury Avenue by traffic travelling north, which may delay south bound traffic. The scale of this problem is measured in a handful of vehicles a day and not all in the morning rush period! This junction is virtually opposite the LTP access road, where potentially 1342 vehicles might seek to cross the congested north bound lanes of the A3023!

The thinking, by traffic engineers, about this location, its problems and how to solve them seemed muddled to say the least. Further, if this arrangement has the support of Highways England in its desire to maintain traffic flow on the A27, it should engage constructively in the process of finding a solution to an existing, and long standing, unsatisfactory situation. The commercial ambitions on the western side of the A3023 should not be given priority over the thousands of residential council tax payers to the east and south.

When IBM first developed this site, in the late 1960's – early 1970's, the question of access was recognised as a potential problem and in 1977/78 HBC together with Hampshire County Council, as the Highway Authority, signed an Agreement with IBM about the road limiting the number of vehicle movements permitted to use the access to 250 per hour, during the peak time. This Agreement was to be enforceable against successors in title. The number of motor vehicles in the 1970's was considerably less than today, but traffic on the A3023 was heavy and the use of this access road was anticipated to be a problem. 50 years later the volume of traffic has multiplied several times and the number of parking spaces to be provided on the LTP site – 1885 is many times greater than that envisaged by IBM.

The community of Langstone does not wish to frustrate the provision of a major employment opportunity in Havant, but it does want a better, safer means of access

that will not create a toxic environment or disadvantage all those who live here. Until a solution is found to this problem our objection to the proposal must stand.	
Langstone Residents Association (original comments): The Langstone Residents' Association wishes to register an OBJECTION to the above scheme. Our thoughts were expressed at the Development Consultation Forum held on 21 May 2019, when we hoped the Owners and their Agents might have listened to our concerns about the part demolition of Building 1000, reconsider that strategy and the resultant consequences of concentrating most of the on-site parking in the eastern sector of the site. The objection now raised is focused on highways matters, the effect the proposal will have on the A3023 and the loss of local amenity resulting from the further overloading of Langstone Road. Are we to assume this Application is to be processed under the terms of the existing Local Plan? The draft Havant Borough Local Plan 2036 is just months away from Adoption and a critical element of the new Plan is the Borough Transport Assessment, which remains unresolved, and importantly for Langstone, the question of the A3023 south of the Langstone Interchange with the A27. Widespread concern about this element of road infrastructure has yet to be addressed and the Applicant's reference to the idea of signalling the access road junction at this point is both misleading and irrelevant. The Langstone Technology Park features prominently in the draft Havant Borough Local Plan 2036 - Policies. At Section KP6, para 3.110 there is reference to 4,000 employees and 1,500 car parking spaces and para 3.113 states "the site would benefit from improvements to its access infrastructure." It continues at para 3.117 - bullet point 6, to highlight the "opportunities to increase permeability of the	The emerging Local Plan has limited weight at this stage but where applicable has been used to guide the development. The proposals impact in terms of traffic entering and leaving the A3023 have been assessed in detail in consultation with the County Highway Authority. A package of measures have been secured to mitigate the impact of the development.

site by breaking up the large areas of car parking." The next paragraph - 3.118 Delivery, states "The Council is committed to the continued success of the Park and considers that further development is necessary to achieve this. Nonetheless, the site also faces challenges in terms of on-site and off-site infrastructure, which need to be fully considered and addressed. The Council will work collaboratively with owners and managers of the site, their tenants and local communities to facilitate needed further investment and development of the site." The current planning application clearly disregards much of this, as yet un-adopted, guidance and should therefore be withdrawn and reconsidered. The Framework Travel Plan is laudable, but typically pro forma and probably difficult to implement with so many diverse employers on the site. One suspects therefore it will not impact on the use of vehicles by the businesses or their employees. Similarly, the Transport Assessment is a very lengthy and 'standard' treatise, quoting surveys, traffic volumes/movements and then giving results following several computer modelling exercises, which are only intelligible to traffic engineers. Local residents, as they sit in traffic queues, watching 'U' turns and waiting to move on to their appointments, will not be convinced of the value of the document. The Agent's representatives, speaking at the recent DCF, gave verbal assurances there would be greater use made of the western access - Brookside Road. This was said to be primarily for HGV's. What is missing from this application is a description of the mechanisms to be introduced to enforce/oblige drivers to use the alternative access point. No regard is given to the Policy KP6 - para 3.117. Instead of breaking up the "large areas of car parking" this scheme will concentrate much of the 1888 spaces to the east side of the site, closest to the access onto the A3023!	The Local Planning Authority is required to determine planning applications on their planning merits when submitted taking into account the planning policy position. The travel plan has been assessed in detail by the Highways Authority and provides measures to improve sustainable transport options. The Transport Assessment provides a detailed analysis of the impact of the development and has been tested in detail by the Highway Authority. Mechanisms are now included and are considered in Part 7 of this report. Air quality and access routes to parking are considered in Part 7 of this report.
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Inevitably, any driver wishing to move to the north, east or south will use this access. Consequently, the quality of air available to local residents will be degraded by nitrous oxide pollution and thus adversely affecting our amenity. The Langstone Residents' Association therefore objects strongly to the present proposals for restructuring the Langstone Technology Park. Those objections will continue until the application is modified to demonstrate the positive measures to be put in place to enforce the control of the increased use to be made of the access road at its junction with Langstone Road. The increase in employee numbers and the significant expansion of the car parking provision indicates a scale of development beyond that expected by the local community. Regardless of the Applicant's technical Transport Assessment, it is self evident that this proposal will have a major impact on the already severe traffic problems around the Langstone Interchange, both north to the Town Centre and south towards Hayling Island. This scheme must be withdrawn pending the completion of the critical Borough wide Transport Assessment, part of the Infrastructure Delivery Plan. The LRA trusts you will make these points known to the Committee/Cabinet Members charged with the duty of determining this Application.	
Note that designs include a 'token area for PVs. The new units should have PV solar panels over the whole of their roofs except the north facing areas. Any surplus energy could be stored in batteries. Have the Council considered the implementation of a central 'ground sourced heat pump' for the Tech Park. Each development could contribute to the cost. We need leading edge innovation for a 'Technology' Park.	The sustainability credentials of the development are considered in part 7 of this report.
I really am concerned that this will just be another development bulldozed through by	

the local council to the benefit of everyone bar the local residence. We have lived (redacted address) for 15 years now and have seen and heard a gradual increase in the level of activity and noise in relation to Langstone Technology Park. Add to this the traffic chaos that has now become the norm, this just seems like another green light for local business to get what it wants (under the guise of more jobs for the local community) without any thought to the local residence. We in particular are affected more than most (redacted detail) to the main the entrance from Langstone, so we not only get all the traffic noise, but we get the added pleasure of looking out to the concrete jungle and car park. We have over recent years, seen the old school playing field replaced with a new hotel and public house, creating yet more traffic. To try and reduce the affect we have extended the height of our fencing to the rear of the property and added over 30 new fast growing Laurel bushes to try and reduce the sound, all at personal cost of over £5000 !!! We have actively been trying to sell our house since July 2019 and the majority of feedback from the 30 or so viewings has been, they love the house, but cannot bear the noise or the view which going by the latest proposals is only going to get much worse. We have had to reduce the selling price by £25000. All of the above and not one offer of compensation. Your feedback would be most welcome.	Noise issues are considered in part 7 of this report Traffic impacts are considered in part 7. Impacts on property prices are not a material planning consideration.
The Council needs to have road infrastructure improvements planned and committed for the Langstone Technology Park before approving any new development. My recommendation is a new entrance/exit from the Park to the A27 west slip road. The Council can fund such infrastructure from the current and future developers of the Technology Park. Each	Impacts on the Highway Network from this development are considered in part 7 of this report.

approved piecemeal development seems to have little effect but the overall will be traffic chaos. The Council needs to look at the end environment and commit the infrastructure for it. The Council's infrastructure plan needs to recognise that 99% of people drive and not assume people use public transport. We do not want a return of the parking chaos in Langstone. The Council's Regeneration Strategy defined the Langstone Technology Park as a place for "extensive employment sites, high quality public open space, leisure facilities and housing for young people". The application for this current development requests "uses" B1c, B2 or B8. The use should be restricted to B1c and not include B2 as B2 is contrary to the Council's plans for future housing. Equally is B8 appropriate for the Council's strategy for the Park. Any new development should reduce Havant's carbon footprint. The new buildings could have parking underneath and solar panel roofs. Batteries onsite can store any excess energy generated. Any additional car parking spaces should be carbon neutral, i.e. the carbon emissions of each car entering the park should be off set by some form of carbon reduction by the site. Rows and rows of cars are an eye soar. The developers need to ensure any new open parking area has considerable greenery. Even better have the cars parked under smart looking buildings. This first redevelopment of the Technology Park needs to set the standard for all future developments. We need the Council to ensure the highest standards of development, we need leading edge environmentally friendly development.	The Highway Authority have considered the transport assessment and travel plan in detail. Parking is considered in part 7. The policy position is considered in Part 7 of this report. The sustainability credentials of the development are considered in Part 7 of this report. The parking areas and landscaping proposals are considered in Part 7. Comments noted and the standard of the development is considered in Part 7 of this report.
The seawall at Southmoor has collapsed in a number of places. Southmoor will soon become tidal. Hence Southmoor will no longer act as a flood plain for excessive surface water and the Lavant stream. Langstone Technology Park pumps water into the Lavant stream. Surface water drains	The application has been considered by the Environment Agency and Local Lead Flood Authority. Part 7 of this report address drainage proposals.

from the Park via ditches etc into Southmoor. The water dynamics are therefore changing. Climate change will increase the risk of flooding from tides, rivers and surface water. The Council needs to have a plan to reduce the risk of flooding in the Park and the surrounding area. For example i) rebuild flood defences and ii) surface water and excess water from the Park should be pumped straight out into Langstone Harbour and not into the Lavant stream. Each development should contribute to an improved water management system.	
I would like to raise my concerns about this development, particularly in regard to the fact that it will undoubtedly lead to significantly increased traffic joining from the Langstone Road if the parking spaces on this site are moved to the North-East. As you may be aware the area already has a significant traffic problem, and this will undoubtedly make it much worse. An existing legal agreement dating from 1982 restricts the number of employee vehicles turning right into Langstone Technology Park from Langstone Road, this being to reduce the possibility of queuing traffic in the right turn lane extending back to affect the performance of the A27 roundabout immediately to the north. This legal agreement permits up to 250 employee vehicles per hour to enter the site between 07:15 and 09:15 hours. A traffic survey done for a previous development on this site determined that the traffic counts in early February 2012 observed a maximum of 284 vehicles per hour turning right during the AM peak on the Thursday and 289 vehicles per hour on the Friday. However, it was assumed for the purposes of the survey that not all of these vehicles were driven by employees, and that around 80% of vehicles would be visitors or delivery drivers. Since this survey was conducted the Langstone Technology Park has massively increased their employee headcount. This has been evidenced by the increased congestion observed in the last few years on Langstone Road, which is now at a standstill during the rush hour most days. The traffic	Noted An assessment of the Langstone Road access use and the impact of the development is made in Part 7 of this report. Empirical information submitted with the submitted Transport Assessment indicated that of the order of 271 vehicle movements took place on a Wednesday in late January turning right into Langstone Technology Park from Langstone Road (comparable with previous traffic counts).

counts for vehicles turning into the business park should be re-assessed taking this into account, including a much more precise measurement of non-employee vehicles, rather than an assumption of 20%. In addition I should point out that the existing Building 1000 was part of an award winning Arup designed development for IBM, and in 1972 it won the prestigious Financial Times Award for Industrial Architecture. It should have been listed years ago, and I believe the Civic Society have suggested this. Replacing this original part of the building with a car park which could be built elsewhere on the site is a very bad idea indeed.	The impact on the heritage assets of the site is made in Part 7.
My concern to the development is the increased traffic on Langstone Road as a result of this development. Traffic builds up in the morning and evening rush hours getting into and out of the Technology Park. Planned increased capacity will increase traffic which will cause problems for the already congested roads and the Havant roundabout resulting in angry residents and also affecting traffic trying to get to the retail areas of Solent Road etc. in Havant. The previous "Road improvements" on Langstone Road have made little or no difference to the situation.	Traffic impacts are considered in Part 7.
My concern relates to the increase in traffic joining or crossing the A3023 Langstone Road. Mornings and evenings it is already difficult to exit Woodbury Avenue. The increase in traffic will also cause further congestion on the roundabout which already gets blocked at rush hour. The road infrastructure in the area is already overloaded and this proposal will add further to this.	The highway impacts are considered in Part 7 of this report.
I would like to object on the grounds that the Penner Road area is completely over developed and the road traffic situation during early morning and mid to late afternoon is completely grid locked and further increasing the land around this area	The highway impacts are considered in Part 7 of this report.

with more units will only increase the grid lock to the surrounding areas Unless the council are going to greatly increase the flow and vehicular access to the main relief roads further development is completely unacceptable to the current residents. The new mini roundabout failed to help reduce pressure on the exit roads to the M27 and Havant area	
I object to this planning application, as I think that the former IBM complex, designed by the internationally acclaimed Arup Associates, is worthy of being listed by Historic England as an important example of 1960s and 70S industrial architecture. Also, I understand that in recognition of its importance Havant Borough Council has been working for some considerable time on making a case for it to be added the List of Buildings of Local Interest. I understand that this would make it a material consideration in a planning application, therefore resources should be made for this work to be completed before any related application goes before the Development Management Committee. Not only did IBM Havant win the 1972 Financial Times Award for Industrial Architecture (see attachment), the courtyard was landscaped by James Russell a notable garden designer, who was also behind the landscaping of Mountbatten House in Basingstoke, which is a grade II registered park and garden as well as a grade II building also by Arup Associates. The entry for the Langstone IBM courtyard garden is included here: https://books.google.co.uk/books?id=SZ2XUkVOwtC&pg=PA4&lpg=PA4&dq=James+Russell+Landscape+designer+Havant&source=bl&ots=LsEPqR80tX&sig=ACfU3U07xmQuTRRLgPLS4SDojWDAEioiWw&hl=en&sa=X&ved=2ahUKEwjEoME1e3gAhUhtnEKHekLAgkQ6AEwB30ECACQAQ#v=onepage&q=James%20Russell%20Landscape%20designer%20Havant&f=false The IBM Havant Plant, at Langstone, was cleverly designed to blend into its	The impact of the development in relation to heritage is considered in Part 7 of this report and consultation carried out with the Council's Heritage Team Leader.

surroundings and situated close to the newly-opened A27 (1965). Set back down a long drive and west of 'Bosmere Field', it was built on a grass mound, which housed various facilities. The original office complex, including a systems assembly plant and computer centre, was completed in 1971. It was subsequently added to in the late 1970s, also by Arup Associates.

1972 ARUP TO THE FORE IN FT AWARDS

(Source: VADS Online Resource for the Visual Arts

'The name of Arup looms large in the Financial Times Awards for Industrial Architecture 1972, recently announced. The winning building, IBM's new plant at Havant, Hampshire, was designed by Arup Associates, as was one of the five commended buildings, the Oxford Mail and Times building. The parent practice, Ove Arup and Partners, acted as consultant engineers to a second commended building, Bernat Klein's design studio in Galashiels, designed by Peter Womersley.'

Arup Associates was a major presence on the British architectural scene for more than half a century, emerged from the famous engineering consultancy founded by Ove Arup in 1946 and reflected Arup's own vision of 'total design', formed in the 1930s in his ground-breaking collaborations with Berthold Lubetkin. With architects, engineers and other professionals working in groups, it offered a uniquely interdisciplinary approach to the design of buildings.

TWENTIETH CENTURY SOCIETY on DEREK SUGDEN

'Sugden's thorough experience of steelwork broadened the practice's expertise, and he came to specialize in factories. As well as working as construction engineers, the firm was designing increasing numbers of its own buildings, and in 1963 it formed an independent multi-disciplinary practice, Arup Associates, with Sugden as one of the four founding partners. The New Museums site at Cambridge and work for IBM at Havant and Portsmouth were among his most important works.'

Supporting Information and Images. 'Arup Associates' is now known as global Arup Architecture. https://www.arup.com/Expertise/Services/Buildings/Architecture This set of buildings is a very important part of Havant's heritage and its integrity should be retained.	
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7 **Planning Considerations**

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

- (i) Principle of development
- (ii) Impact upon the character and appearance of the area
- (iii) Impact upon residential amenity
- (iv) Business
- (iv) Highway matters
- (v) Flood Risk/Drainage
- (vi) Heritage
- (vii) Trees/Landscaping
- (viii) Ecology
- (ix) Sustainable design
- (x) Other Environmental impacts

(i) **Principle of development**

7.2 The application site is situated within an urban area as defined by policies CS17 and AL2 in the adopted Local Plan where there is a presumption in favour of sustainable development subject to other detailed considerations as set out in this report. The National Planning Policy Framework (NPPF) also emphasises the need to support sustainable development. Policy CS2 of the Core Strategy prioritises the use of previously developed land for the provision of new employment floorspace.

7.3 In addition to adopted policy Langstone Technology Park (LTP) is identified as one of nine key projects in the Pre-Submission Havant Borough Local Plan 2036 (HBLP 2036) to provide commercial development, reinforcing its position as a key employment hub. Specifically, the original IBM plant at LTP is earmarked for modernisation and intensification of new industry, new technologies and low carbon options, particularly in the fields of digital, transport and communications. Whilst the HBLP 2036 carries limited weight at this pre-submission stage it does clearly indicate the Council's 'direction of travel' with regards to LTP.

7.4 The HBLP 2036 identifies the site for comprehensive redevelopment under policy KP6, including new or converted B1, B2 and B8 floorspace together with supporting uses and infrastructure. The current application has three principal elements:

- The part demolition of Building 1000 with new elevations to the retained part of the building and a new elevation to the north of Building 4000, refurbishment of part of

- Building 1000,
- Provision of revised parking across the site,
- Construction of approximately 12,575 sqm of new industrial units.

- 7.5 The business case for the proposed development is considered further in (iv) below including the suitability of existing and proposed buildings to meet modern business requirements. It is considered that the proposals would support the delivery of employment floorspace in line with emerging policy DR1 of the HBLP 2036.
- 7.6 Whilst the development/redevelopment/refurbishment currently proposed is more modest than anticipated in emerging policy, there would be nothing to preclude a more comprehensive redevelopment coming forward at a later stage on the site. As such it is concluded that the application proposals are broadly supported by both adopted and emerging policy (subject to the assessment below).

(ii) Impact upon the character and appearance of the area

- 7.7 LTP is a large 'campus style' industrial site which is relatively 'self contained' in character. The site is located to the south of the A27 dual carriageway which is partly elevated above LTP and south west of Langstone Roundabout and the west bound slip road onto the A27 from Langstone Road and Havant. Footpath 50 runs along the sites northern boundary. To the east are the relatively recent developments of the Premier Inn Hotel and Langbrook Farm Public House/Restaurant. Residential properties in Langbrook Close and Brookmead Way are also to the east and south east of the site. The Langbrook stream and footpath 51 run to the eastern side of the site.
- 7.8 To the south and west of the site are business developments including to the South, Endeavour Business Park, Penner Road (Luxor Park, Pyramid Park, Alexander Park) and to the West Southmoor Lane Industrial Estate and industrial units in Brookside Road.
- 7.9 The existing buildings on the site include an element of uniformity which although varying in heights have a considerable degree of continuity of material finishes with grey cladding and flat roofed designs. The buildings generally have a horizontal emphasis with banding and glazing adding to this emphasis. The buildings also generally have extensive footprints. The design of the buildings generally reflects the IBM business requirements from the early development of the site.
- 7.10 The main potential impacts on the character and appearance of the area would result from the following main elements of the development:
- The new buildings to the south-west of the site;
 - The reconfiguration of buildings 1000 and 4000;
 - Car parking alterations.

The new buildings to the south-west of the site

- 7.11 The proposed new buildings would be located in a part of the site which is set well away from the road access points from Langstone Road and Brookside Road. They would be effectively surrounded to the north, west and south by existing industrial development of varying heights, mass and bulk. To the east would be an extensive area of car parking within the LTP beyond which is a significant belt of woodland with the Langbrook Stream and residential properties set beyond.

- 7.12 The buildings proposed would constitute four new large structures designed to provide flexible accommodation suitable for a variety of Class B1 (Business), B2 (General Industrial) and B8 (Storage and Distribution) uses. The buildings would provide 12 business units in total.
- 7.13 The western block comprises units 1-5. These units would have a strong horizontal emphasis and appear as a two storey flat roofed building from ground level (with parapet walls concealing a shallow pitched roof within). The building would be clad with horizontal metal cladding with the top band and entrance features shown in grey and vertical wall panels with mixed colours (cream, beige and sandy). The building would have a height of 9.4m with most of the accommodation for the units being at ground floor level. There would be small ancillary rooms at first floor level.
- 7.14 The northern block units 6-9 would have a similar design again picking up on the horizontal design and parapet giving the appearance of a two storey flat roofed building from ground level. The building would have a height of approximately 10.8m (reflecting the greater building depth than units 1-5). This building is set closest to the existing main buildings on the site. The materials would be similar to units 1-5, however on the East and north elevations further feature panels are included with window openings, these would help to pick up on some of the character of the existing buildings. The accommodation would again be mainly at ground floor level with some smaller areas of ancillary floorspace at first floor level.
- 7.15 Units 10-12 are in two blocks with two of the units offering larger floorspace than the rest of the proposed buildings. The design and materials are again similar to units 1-5. The buildings would have a height of approximately 13.1m reflecting again their increased depth. The tallest building would be two storey in height in terms of any internal accommodation (with a small first floor area shown), however it should be noted that the height is approximately equivalent to a four storey residential building. This block is set furthest from the existing main on site buildings.
- 7.16 It is clear the proposed new buildings are very significant in terms of their size and heights, however they would be viewed in the context of the extensive 'campus style' LTP and the surrounding industrial development. It is considered that the buildings have been designed to pick up on features of the existing site whilst providing an area of more modern and flexible business accommodation. The location of the units are set a minimum of 170m from the closest residential property to the east.
- 7.17 It is considered that the proposed new industrial buildings would have an acceptable impact on the character and appearance of the area having due regard to their scale, siting, design and general materials.

The reconfiguration of buildings 1000 and 4000

- 7.18 Building 1000 is the largest building on the site. This is a five bay building which has proved to be difficult to let and is currently only partly occupied (this is considered further in part (iv) below). The proposal is to demolish two bays of the building and provide a new frontage to the revised eastern elevation. This would incorporate an attractive entrance feature, extensive glazing to increase natural light penetration into this deep building and revised cladding. These alterations are considered to provide an attractive modern façade to the building.
- 7.19 Building 1000 is readily viewable from footpath 50 and from the A27. It is considered that the revisions to the building are attractive and reflect recently consented

alterations to building 6000.

- 7.20 Building 4000's north elevation would also be altered with revised entrance, glazing and cladding. These changes would be viewable from the north across a revised parking area. The changes would tie into the design approach to building 1000.
- 7.21 It is considered that the alterations successfully maintain the character of the existing 'campus' style of design within the site whilst improving the usability of the retained buildings. Overall, the alterations to the existing buildings are considered to have an acceptable impact on the character and appearance of the area.

Car parking alterations

- 7.22 The car parking alterations include the loss of some parking where the new buildings are proposed, the provision of additional parking areas where building 1000 is being reduced in size and further parking within current landscaping areas. The overall impact of this would be to increase the site coverage by hardsurfacing or buildings.
- 7.23 A feature of LTP is the extent of parking on site mainly to the south and north of the existing buildings. The scheme has evolved to seek to minimise the visual impact of the revised parking and to introduce further landscaping wherever possible to help to break up areas of parking, improve the character and visual impact of the parking and to improve the ecological credentials of the scheme.
- 7.24 It is noted that the parking within the new buildings area would have limited wider visual impact. This area presents difficulties in terms of new landscaping given the likely operational requirements of future occupants and in particular the manoeuvring of large vehicles within the central 'courtyard' areas. This is considered unfortunate, however, given the limited wider impact of this parking area in visual terms and the operational issues it is considered that the proposals are acceptable.
- 7.25 Other parking areas are generally improved by additional landscaping and this is considered further in (vii). In particular detailed consideration has been given to the new parking area adjacent to the reduced building 1000. Overall and on balance the visual impact of the revised parking is considered acceptable subject to the imposition of a landscaping condition.

(iii) Impact upon residential amenity

- 7.26 The main impacts on residential amenity are considered to be from potential noise, fumes and traffic impacts. The application has been considered by the Environmental Health team in relation to impacts on residential amenity.
- 7.27 In relation to traffic impacts the Environmental Health Officer previously requested confirmation that the routing of MGW /HGV traffic to and from the proposed new industrial units would be through the Brookside Road site entrance. The document entitled '*Response to Consultees on transport and highway matters dated October 2019*' confirms and clarifies that this is the case. Reference is also made to the internal road layout being constrained to prevent routing of HGV's within the site and the internal signage will be provided to direct HGV's of routing restrictions. The Environmental Health Officer has indicated that this is satisfactory if implemented as such. The routing of traffic to the new units will be secured through the layout and appropriate conditions as appropriate.
- 7.28 As a consequence of the routing restrictions for larger vehicles it is considered that the

development would, in terms of vehicular movements have an acceptable impact on the nearest residential properties in Langbrook Close and Brookmead Way.

- 7.29 With regard to the operation of the proposed business units, they would be sited approximately 176m off the nearest residential properties with a car parking area, stream and belt of trees between the residential and proposed business uses. It is however noted that the proposals include B2 General Industrial uses. It is therefore necessary to consider the potential noise and fume impacts from the uses. An Acoustic report has been submitted and amended during the course of the consideration of the application to address the requirements of the Councils Environmental Health Officers and provide baseline background noise levels. These can serve as a baseline for each of the future units occupants to ensure that any potential noise generating operation, be it during the day or night, can be assessed if required, for each individual unit, against these existing base line levels. The Environmental Health Officer advises that *any mitigation measures that may be required, to ensure no adverse impact on existing residential receptors, must then be implemented*. A condition is recommended to secure this and is listed in Conditions below.
- 7.30 It is recommended in relation to external extracts or plant that a further condition is imposed to ensure that noise or fume pollution is avoided.
- 7.31 The construction phase can result in impacts which need to be considered and a Construction Environmental Management Plan is recommended. In addition Informatives in relation to Hours of Work, Dust Control and Lighting are recommended by the Environmental Health Officer. Overall and subject to appropriate conditions and S106 requirements as necessary, it is considered that the development would have an acceptable impact on residential amenities.

(iv) Business

- 7.32 There are two main elements to consider in relation to the sites Business Requirements, these relate to the existing floorspace and in particular Building 1000 which is proposed to be partly demolished and secondly the proposed new business floorspace comprising 12,575 sqm of new floorspace for B1, B2 and B8 uses.

Building 1000

- 7.33 The application is accompanied by a Marketing Strategy Report by Lambert Smith Hampton from which the following comments have been taken. Building 1000 is the largest building on the complex comprising approximately 14,864sqm arranged in five bays. The building was designed as a manufacturing facility and this is reflected in its specification. The building was constructed of a steel frame with a hanging concrete clad interior and a slab roof. Windows are single glazed, the floor is solid in bays 1, 2, 4 and 5 with a suspended floor for the majority of bay 3. The building has a floor to ceiling height of 6m which reduces to 4.2m under the roof trusses which run east to west. There is one loading bay at the western end of the building adjoining area 5.
- 7.34 There are windows along the north, east and west elevations of the building. The southern elevation does not have any windows due to the north elevation of Building 4000 abutting bays 1 and 2 and the communal service corridor that runs from bay 2-5. The cores dividing the bays run north south and prevent any daylight reaching bays 2, 3 and 4 from either the east or west directions. There are no skylights in the roof due to the construction of the wood-wool slab roof.

- 7.35 Bays 2, 3 and 4 measure approx. 75m by 55m each which creates very deep space with only daylight from the north. Bays 1 and 5 benefit from reduced width of 35m and daylight from the east and west elevations respectively.
- 7.36 Building 1000 has been constructed approx. 3m above ground/car park level with access tunnels running beneath the building so that it can be maintained and serviced as required. There is also an undercroft under part of bays 3-5 which runs east west. This provides access to storage areas and key plant and equipment.
- 7.37 In terms of the buildings occupational history, the building was purpose built for IBM as their main manufacturing plant in 4 phases between 1969 and 1978. IBM ceased operating at the facility in 1995.
- 7.38 Xyratex acquired the facility and the use of the buildings remained relatively unchanged with Xyratex manufacturing the same product, however, due to changes in the market and technology Xyratex subsequently contracted in operations, retracting into Building 1000, eventually occupying approx. 11,150sqm within bays 1 – 3, and part of bay 4 and some space within Building 4000.
- 7.39 The majority of bay 4 was not suitable for use as offices, due to lack of daylight, and so was sub-divided to provide small ancillary storage spaces and IT server / data centres for existing site based occupiers. Bay 5 was converted to offices as it benefits from good daylight along the entire west frontage (75m) and north frontage (35m).
- 7.40 Xyratex was purchased by Seagate in 2013. As manufacturing on site reduced, the northern parts of bays 1 and 2 that had better daylight were converted to hybrid office space servicing the ongoing manufacturing activities. In July 2016 Seagate announced they were closing the Havant Facility as they needed a more efficient manufacturing footprint, in a building more fit for modern standards. As a consequence Seagate exercised its break on the remaining space in bays 1, 2 and 3 of Building 1000 in September 2017. The space since then has remained vacant, and has been marketed by Lambert Smith Hampton.
- 7.41 In relation to Marketing, following Seagate's decision to close in 2016 Lambert Smith Hampton was appointed to market bays 1, 2 and 3 in Building 1000. A comprehensive marketing campaign across all B Class land uses in order to ensure that the site was publicised to as wide a range of potential occupiers as possible.

7.42 The marketing has been unsuccessful for the reasons as set out below:

Manufacturing and distribution uses:

- Floor to ceiling heights too low especially under the beams where the clear height is only 4.2 metres
- No services yard in front of Areas 1, 2 and 3.
- Insufficient loading doors with only one door serving the whole of Building 1000 (160,000sq ft) in Area 4/5, which is located too far away from Areas 1, 2 and 3.
- Artic trucks cannot turn safely on the existing loading platform
- Significant change in levels, over 3 metres, between parking areas and finished floor levels make it impossible to improve servicing arrangements

- Lack of prominence and identity

Office uses:

- The buildings deep floorplates coupled with no natural light from either the southern elevation or in the case of Areas 2 and 3 from the east or west elevations makes the space a dark working environment.
- In our experience, occupiers today want good levels of natural daylight as this has a positive bearing on staff wellbeing.
- The specification of the space is dated and uninspiring and requires significant investment to bring it in line with modern working standards.
- The large and deep "Areas" are difficult to partition into smaller demises to cater for the growing SME market and this again is a limiting factor in attracting potential tenants.
- With single glazed windows and an aging HVAC system the building is not energy efficient.
- Given the size of the building and the scale of likely potential occupiers, the building lacks an identity and suitable entrance.

Lambert Smith Hampton conclude that in this context bays 1 and 2 of Building 1000 cannot meet modern occupier requirements, and cannot be modified to make them more attractive, given that many of the matters are intrinsic to the character, structure and layout of the building. Bay 3 is also compromised, but could be improved by the removal of bays 1 and 2.

It is clear that whilst Langstone Park can provide what occupiers want from an amenity and connectivity perspective bays 1, 2 and 3 do not provide the type of physical space that either Industrial, manufacturing or office occupiers want.

The daylight into Area 3 can be greatly improved by demolishing bays 1 & 2 including the core between bays 2 and 3. Increasing the extent of the glazing on the new eastern façade will also further improve daylight levels and the quality of the space.

Whilst bay 3 will be deeper than bay 5 the glazed area will be 3 times greater. Bay 3 already benefits from a raised access floor. The demolition of Areas 1 and 2 would also enable a new entrance to be created into Building 4000 (amenity block) and for parking to be provided at the same level as the buildings.

In this context, the removal of bays 1 and 2 will to a large extent address the matters that compromise bay 3.

Lambert Smith Hampton conclude that bays 1,2 and 3 of Building 1000 are not lettable in their existing configuration as evidenced by the current marketing campaign.

The scale of demand for offices is reducing, particularly for larger floorplates. The current configuration of bays 1, 2 and 3 does not meet office occupiers' needs and demands.

Significant investment into the existing building will not enable it to meet modern working practices.

Whilst strong demand from Industrial / Logistics operators in the area and lack of supply bays 1, 2 and 3 are not suitable for conversion to Warehousing / Logistics and should be located elsewhere on the Park.

Consideration should be given to the demolition of bays 1, 2 and 3. Alternatively through the demolition of bays 1 and 2 to improve the daylight to bay 3, the refurbishment of bay 3 and improvements to public realm LSH believe office space can be delivered which meets occupier's requirements.

In summary LSH state that the best opportunity to meet the demand for the local area is to:

1. Demolish Areas 1 and 2 in B 1000
 2. Refurbish Area 3 with new façade, fit for modern office working practices
 3. Build new Industrial units on southern car park
 4. Replace car parking lost in the southern car park with new parking around the site.
- 7.43 The current proposal is to demolish bays 1 and 2 and to refurbish bay 3 to improve its attractiveness to future commercial occupiers. It is accepted from the information submitted that the areas of the building to be demolished are not suitable for modern business purposes and market demand. The principle for the demolition and refurbishment in business terms is therefore accepted, the impact of the demolition in relation to the sites heritage is considered further in (vi) below.

Proposed Buildings

- 7.44 The application includes the erection of flexible use modern industrial uses to the southern part of the site. The layout proposes four modern industrial buildings which could be arranged flexibly to provide business floorspace for a mix of flexible use purposes in B1c, B2 and B8 use classes comprising approximately 12,575sqm of floorspace.
- 7.45 This modern, flexible accommodation would suit a range of potential occupiers and this can be contrasted with the nature of Building 1000 and the limitations outlined above. This will ensure that marketing can be carried out widely and this will encourage business development and employment opportunities at the Langstone Technology Park. The submitted Planning Statement lists in 4.4 all the works proposed on the site and concludes that: *As a result of the above works, which require a significant capital investment, the park will be rejuvenated and will assist in retaining and attracting new occupiers onto the park thus generating additional employment opportunities within the Borough.*

(iv) Highway matters

- 7.46 In relation to Highway Matters the main issues are considered to relate to the following matters:
- (i) The Sustainability of the site and potential improvements
 - (ii) The vehicular access routes for traffic from the East (Langstone Road) and West (Brookside Road).
 - (iii) Internal Traffic movements and potential mitigation/route restrictions
 - (iv) The impact on the Strategic Highway Network

- (v) Parking
- (vi) Construction Phase

The application has been submitted with Traffic / Transport Appraisals and a Travel Plan which have been supplemented where required by additional information in response to matters raised by HCC as the Highway Authority or HBC as the Local Planning Authority.

7.47 The detailed technical transport submissions in relation to the application have been accompanied by a non-technical summary. This provides an overview of the approach to controlling access and reducing impacts at Langstone Road. In summary the document states highway issues have been addressed as follows:

- Base traffic levels established through series of traffic counts
- As site not fully occupied at present this has been allowed for in the traffic forecasting.
- Site traffic forecast patterns for the proposals have been compared against traffic patterns from full occupation of the current site layout for daily and peak hour operation. This demonstrates that overall there will be a modest reduction (from full occupation) in the site traffic both daily (3-4% less) and during peak periods (around 5% less).
- Existing access junctions would continue to be used for vehicular traffic
- Proposals re-distribute the pattern of development footprint within the site with more located to west of the site. The road layout is changed to provide easier access to more of the car parking within the site from the west.
- Emphasis on vehicular movement to the west is re-enforced in two ways. First, all new development HGV traffic will route to the west. Only the main existing office units (Buildings 6000 and 7000) will be serviced by HGV's to the east. These offices attract very limited numbers of HGV's. Overall there will be a reduction in net terms to the east, with an increase resulting to the west.
- Car traffic during the morning peak (0730-0900 hours) will be subject to internal barrier control on the site road network at two locations, such that 543 parking spaces will only be accessible from the west. The total number of parking spaces across the site increases from 1854 to 1881, a 1% increase.
- Site access junctions have been modelled to test their performance in 2024, this demonstrates each will operate satisfactorily without causing downstream queuing.
- The proposed transport package agreed with HCC and HBC comprises:
 - Restricting HGV access from the east (except to office buildings 6000 and 7000.
 - Prohibiting vehicular access to just under 30% of the car park during the morning peak period (0730-0900 hours) from the east (Langstone Road)
 - Contribution £67,000 to enhance footpath 51
 - Contribution of £25,000 towards bus stops
 - Lengthening of right turn lane marking in from site access road from Langstone Road and associated signage
 - Implementation of a Travel Plan to discourage single occupancy car use by employees within re-development site with funding to HCC to monitor and maximise benefit
 - Enhanced pedestrian and cycling route facilities within the Tech Park.
 - Sustainable credentials enhanced by addition of electric charging points across the development and extensive safe covered cycle parking in accordance with local standards.

The Sustainability of the site and potential improvements

- 7.48 The site is located approximately 0.65km south of Havant Town Centre (building 1000) and a little further from Havant Bus Station and Rail Station. The site is served by bus stops on the east (southbound) and west (northbound) sides of Langstone Road. There is also a pedestrian and cycle route to the Town Centre. The site is considered to be located in a relatively sustainable location, however, during the course of the consideration of the application deficiencies in the existing connectivity have been identified.
- 7.49 In relation to Bus services negotiations to secure an upgrade to the northbound and southbound bus waiting facilities serving the development on Langstone Road have been agreed and a contribution of £25,000 will be secured through the S106 Agreement towards the upgrade of this infrastructure.
- 7.50 In relation to Walking and Cycling, the most significant link to the site is Footpath 51 which runs north to Havant Town Centre and associated facilities and other public transport links. The northern section of Footpath 51 requires improvement and runs between the site access road and the A27. To improve pedestrian and cycle connections through the development, the applicant has agreed to pay a contribution of £67,000 towards the upgrade of this section. This section is currently liable to being unusable at certain times of the year and the contribution secured through the S106 Agreement will include the tarmacking of the surface of this section of the path and widening it to 2.5m to ensure it is available as an all year pedestrian and cycle connection between the site and Solent Road (and beyond to the Town Centre).
- 7.51 In addition, appropriate signage from Footpath 51 where it meets the site access will be provided to direct pedestrians and cyclists onto the existing shared use facilities on Langstone Road. The upgrade will also feature the widening of the northern connection into the development. These measures will also be secured via the S106 Agreement.
- 7.52 A travel plan seeking to encourage non-car based travel and other sustainable transport requirements has also been secured through the S106 Agreement.

The vehicular access routes for traffic from the East (Langstone Road) and West (Brookside Road).

- 7.52 The site is currently served by two vehicular access points, the first from the East (Langstone Road) and the second from the West (Brookside Road). There has been concern raised in particular in relation to the impact of the proposed development on the traffic entering and leaving the site at Langstone Road. This issue has been carefully considered by Hampshire County Council, Havant Borough Council as the Local Planning Authority and the Development Team. This has resulted in amendments to the scheme and consideration of methods aimed at restricting the flow of traffic to the two access points both in terms of the physical layout of the proposed development including routes to the proposed new buildings and associated parking, the alignment of routes within the site and physical barriers to restrict parking being used in the peak period.

Langstone Road Site Access

- 7.53 Hampshire County Council have assessed the development proposals in detail in relation to the impact on the Langstone Road access which is particularly sensitive

given its location on the only access route to and from Hayling Island. Consideration to HGV and car movements have been assessed with particular emphasis on the peak hours impacts, which have been the subject of previous legal agreement limitations (see Planning History and Section 6).

- 7.54 Modelling of the junction and the right turn lane have been made to correctly factor in the right turn lane and upstream signals at the roundabout. As noted above the applicant is proposing traffic flow barriers within the site which will reduce the number of movements into the site from Langstone Road at peak times, and this is considered a positive feature of the scheme which the development will deliver and which acknowledges the historic sensitivity of movements from this access. They are also providing additional right turn lane capacity and signage at the roundabout.
- 7.55 An associated issue with the Langstone Road access have been concerns in relation to U-Turning in existing residential cul-de-sac accesses of Langstone Road. This has been a particular issue in Langbrook Close. This is partially caused by vehicles insufficiently anticipating the turning into the development, immediately off the A27 roundabout, and having to U-turn at the next available junction.
- 7.56 To address this matter and reduce the number of u-turning vehicles, the applicant has agreed to amend the white lining at the back of the right turn lane when heading southbound from the A27 roundabout. By removing the surplus white lining, additional capacity in the right turn lane will be provided, providing additional space for motorists to wait should there be a queue of vehicles waiting to access the site. This will be supplemented with additional signing at the A27 roundabout to inform motorists of the immediate turn into the site.
- 7.57 Overall in relation to the proposed development the package of measures outlined above including consideration of the demolition element, the layout of the new development and re-design of routes across the site to restrict HGV movements, the peak hour barriers restricting access to some parking areas from the east, the Travel Plan and sustainable transport improvements it is considered that the impact of the development on the Langstone Road access will be appropriately managed and mitigated.

Brookside Road Access

- 7.58 The Brookside Road Access leads through an industrial area to Harts Farm Roundabout with routes to the west to the A27.
- 7.59 The Brookside Road Access avoids impacts on the busy Langstone Road route and it is noted that the layout of the new industrial buildings allows for easier access to the new units from Brookside Road and ensures that HGV movements are from Brookside Road to serve the new units. At peak AM hours there would also be restrictions for cars to access parking west of the barriers within the site with all access at these times to the west of the barriers being taken from Brookside Road.
- 7.60 The Harts Farm Way Roundabout has been modelled and the latest model notes unequal lane usage on the Brockhampton Road approach, owing to a reduced number of vehicles turning left using the nearside lane. This is addressed by modelling this arm of the roundabout as only far-side lane with a provision of a bypass for left turning traffic. Hampshire Highways have confirmed that this is now considered acceptable due to the reduced volume of left turning traffic.

- 7.61 Unequal lane usage has also been noted on the Harts Farm Way approach. A sensitivity test has been undertaken which models the arm with a far-side only approach (mirroring the Brockhampton Road model), showing similar results as the previous model. As such, HCC Highways have confirmed that this matter is also now acceptable.
- 7.62 A sensitivity test has been undertaken for the Harts Farm Way roundabout to ascertain how the junction will operate with additional vehicular trips using the western site access as a result of the internal barriers controlling traffic flow through the site. Across both the 88 and 81c re-development scenarios (modelled to a future year of 2024) junction performance will be very similar, with the biggest delays noted on the Brockhampton Road arm (RFC value of 0.83) and Harts Farm Way arm (RFC value of 0.74). However, these approaches will still be operating within capacity and are therefore considered acceptable.

Internal Traffic movements and potential mitigation/route restrictions

- 7.63 The applicant has provided clarification with regards to the operation of the traffic barriers proposed within the site which will restrict the east to west movement of vehicles between 7:30am - 9:00am. This will encourage motorists to utilise the western access into the site from Harts Farm Way, taking traffic away from the Langstone Road site access. 29% of parking will be available from the western access only to further consolidate this arrangement. Commensurate with the above, traffic modelling has been undertaken for both the Harts Farm Way roundabout and Langstone Road site access junction which is detailed above and is considered acceptable.
- 7.64 To restrict the movement of HGVs through the site, the internal layout has been designed to physically constrain these movements. Given the location of the new employment buildings to the west of the site, HGVs will need to utilise the Harts Farm Way roundabout into the site to access these buildings. A low level of HGV usage will be observed through the Langstone Road site access to service the existing office buildings, reflecting the current arrangement.
- 7.65 These measures within the site help to restrict the car and HGV movements from the east and Langstone Road to a satisfactory degree. It is noted that these measures are satisfactory to Hampshire County Council the Highway Authority.

The impact on the Strategic Highway Network

- 7.66 The A27 is a Trunk Road and Highways England have been consulted in relation to the proposal and potential impacts on the strategic highway network. They have offered no objection to the proposed development. It is not considered that there would be a harmful impact on the operation of the A27.

Parking

- 7.67 With regard to **car parking** the existing site is extensive with the main parking areas to the east of buildings 1000 and 400 and to the south of buildings 5000 and 6000 and with other smaller parking areas. The Transport Assessment confirms that there are 1854 car parking spaces on site and that following the development (including demolition) there will be 1888 spaces (a marginal increase). This would be made up of:

913 spaces retained
941 spaces lost
693 spaces replaced

282 new spaces

- 7.68 The car parking requirements for the site are somewhat complex especially bearing in mind the proposed flexible use for the new units. The Transport Assessment sets out the parking for the proposed and retained buildings.

Proposed Buildings

- 7.69 In terms of the proposed buildings, the parking requirements have been calculated against the buildings as if they are all in B1c use (B1c has the highest parking requirement out of B1c, B2 and B8 uses). Based on all the new floorspace of the proposed units there would be a requirement under the parking standards for 279 spaces to be provided. Within the layout there would be 282 spaces provided (plus 5 additional spaces within the sub-station area). The proposed buildings are considered to be provided with adequate car parking.
- 7.70 With regard to cycle parking, the cycle parking shown for the new units, is considered acceptable and meets the Councils cycle parking standards with the exception of unit 12. A condition is recommended to secure the required cycle parking for this unit.

Refurbished units 1000-7000

- 7.71 The Transport Assessment states that there are currently 1,854 parking spaces serving 58,412m² of employment floorspace at a ratio of one space per 32sqm – the site has been operational for a long time. The new buildings will result in a loss of 941 spaces. To offset the spaces lost an additional 693 will be provided around the site in the position of the demolished bays of building 1000, to the eastern side of the site, to the south of building 6000 and to the north of the new units.
- 7.72 There will be a total of 1,601 spaces for the remaining 51,125m² of retained floorspace (following the part demolition of building 1000 and other lost floorspace). This maintains the existing ratio of one space per 32m². The detailed operation of the parking within the site will need to be managed by the park as is currently the case.
- 7.73 With regard to cycle parking for the existing site there is an existing long stay cycle parking to the north of the creche. This is secure covered parking available to employees on the park. Additional cycle parking will be provided for building 1000. 10 short stay stands are proposed adjacent to the entrance to the building. In addition, 24 long stay spaces are proposed within the north west corner if the new car park area in front of the unit. Finally, additional cycle parking would be provided for building 4000 to provide 9 short stay spaces. Overall and subject to an appropriate condition to secure cycle parking it is considered that the provision is acceptable.

Construction phase

- 7.74 In relation to the construction phase of the development, there are concerns in relation to potential impacts on the Highway Network and in particular potential impacts on the Langstone Road traffic flow. A construction phase condition is therefore required which will include construction traffic routing and their management and control, parking and turning provision to be made on site and measures to prevent mud on the highway etc.

(v) Flood Risk/Drainage

- 7.75 In relation to flood risk and drainage there are considered to be three main issues:

Surface Water Drainage and potential impacts to on and off site flood risk; Potential pollution to watercourses and the environment (also considered further in (viii) below) and Foul Drainage capacity and requirements. These are considered below:

Surface Water Drainage and off site flood risk

- 7.76 The site is bounded to the east by flood zones 2 and 3 associated with the Langbrook Stream. The application has been submitted with Drainage Strategy General Arrangements plans, Indicative drainage details, summary of existing surface water drainage for proposed development areas and Calculation Package and Design Philosophy for Drainage.

The Calculation Package and Design Philosophy for Drainage provides the following Summary:

Summary of design philosophy:

- 1. Conversations had with the Environment Agency (EA) indicated that an unrestricted flow was suitable for discharge into the main river located east of the development. Areas 3, 4a and 4b, as indicated on the supplied general arrangement drawings will discharge to the main river via a pumping station, as per the current arrangement.*
 - 2. Area 1 will discharge to the southern water asset in Langstone road as per the current arrangement. The current discharge is believed to be uncontrolled, the proposed arrangement will seek to limit the discharge to 7.5l/s in line with the greenfield run off rates for 1 in 1 year events.*
 - 3. Area 2 currently discharges south off the site to the drainage system serving the adjoining industrial estate. This area was originally owned by Langstone Technology Park but was transferred to new owners to allow development. A Land Transfer Agreement dated 13th December 1994 (found in Appendix C) states that (a) to the free passage and running of surface water from the Property [LTP] over the land hatched blue on plan 5 (the 'Blue Land') (being the adjoining land to the southern boundary of the Property [LTP]); (b) of entry onto the unbuilt upon parts of the Blue Land on reasonable prior notice (except in emergency) to maintain inspect and clean the surface water media serving the Property. This right is subject to the person exercising it causing as little interference as possible and making good damage caused and complying with any management plan agreed between the owner of the Blue Land and the Council;*
- 7.77 For the proposed new industrial units the general strategy is that water drains to a piped system with under car park attenuation tanks with controlled hydro-brake release to an existing surface water sewer. New parking to the north of the new units would include permeable surfaces with a hydro-brake controlled flow to the existing drainage system.
- 7.78 The enlarged parking area to the south of Building 6000 would have permeable surfacing for parking areas with oversized pipes allow storage of water on site and discharge to an existing surface water sewer with hydro-brake to control discharge flow.
- 7.79 The new parking area to the east of the retained part of building 1000 would drain to drainage filter strips around the car park, there entering existing surface water drains via a flow control eventually leading via a pump station to the river (Langbrook).
- 7.80 Additional parking areas to the lower level further east and north of the demolished

part of Building 1000 and the upper new car park, would include permeable surfacing and would drain to the same system at a controlled rate.

- 7.81 The drainage strategy takes account of flood risk for 1:100 year + 40% for Climate Change.
- 7.82 The drainage strategy has been assessed by the Environment Agency, Hampshire County Council as the Local Lead Flood Authority and Southern Water.
- 7.83 The Environment Agency now confirm that: *We have reviewed the new submitted information and consider that it satisfactorily addresses our earlier concerns.* The Local Lead Flood Authority have confirmed that: *the County council as the Lead Local Flood Authority (LLFA) has no objection to the proposals.*
- 7.84 Southern Water require a foul and surface water drainage condition together with requirements to ensure that pollution is avoided to the water systems. Appropriate requirements will be included by Conditions or Informatives as appropriate.

Potential pollution to watercourses and the environment

- 7.85 It is noted that the drainage systems proposed will utilise the surface water and foul water systems currently serving the site with appropriate limits to flow rates and on site storage where appropriate. The surface water system drains ultimately to the watercourse Langbrook running to the east of the site. This in turn runs into Langstone Harbour to the south. Langstone and Chichester Harbours are Nationally and Internationally protected areas with SPA, RAMSAR, SSSI and Special Area of Conservation status.
- 7.86 It is particularly important to ensure that at the construction and use phases pollution to the water environment and the linkages that they provide to these protected habitats is avoided. This is considered further in part (viii) below and conditions and informatives are recommended to address issues raised by drainage and environmental consultees.

Foul Drainage

- 7.87 In relation to foul drainage the Calculation Package and Design Philosophy for Drainage provides the following Summary:

Foul Drainage

The proposed alterations to the site include the demolition of 5500m² of structure with the loss of floor space for 550 people.

Officer Comment: This represents the theoretical occupancy level if the part of Building 1000 to be demolished were in full occupancy.

The proposed development could generate the following:

The new development could generate the following;

B1 Offices 1:10 m²

B2/ B1(c) light industry 1:40 m²

B8 warehouse 1:70m²

Therefore;

Units 1-5, B1(c) = 92 people or as B8 = 68 people

*Units 6 - 9, B1(c) = 174 people or as B8 = 121 people
Units 10-12, B1(c) = 119 people or as B8 = 169 people.*

Total people = 385 maximum.

Therefore, the development is reducing the population by 165 people and subsequent foul flows. There should be no requirement for foul infrastructure reinforcement or phased development other than the demolition of the existing space before the new is created.

7.88 The drainage from the new units would be to an existing Foul Water Drain crossing the site.

7.89 Southern Water in their latest consultation response have confirmed in relation to Foul Drainage that:

Given that the new development will result in a net reduction in flows discharged to the sewerage network, I am able to confirm that the following condition recommended in our previous consultation response of the 27th August 2019 is no longer required by Southern Water:

"Occupation of the development is to be phased and implemented to align with the delivery by Southern Water of any sewerage network reinforcement required to ensure that adequate waste water network capacity is available to adequately drain the development".

7.90 Overall and subject to conditions and informatives together with pollution issues considered below it is considered that the proposed development can be appropriately drained to avoid flood risk

(vi) Heritage

7.91 The site has been carefully considered in relation to its heritage assets by the Councils Conservation Officer. It is also noted that Building 6000 was recently considered by English Heritage in relation to a request for listing.

7.92 The Conservation Officer provides details of the sites history and layout and the significance of the Heritage Asset and the impacts of the part demolition of Building 1000 as set out below:

The site is a 'campus style' industrial park with buildings dating from the early 1970s. Originally built for IBM it housed one of two manufacturing plants in the UK. Building 7000 and the first two bays of building 1000 were the first to be built on the site and appears in the In-house Arup Journal April 1971 the caption refers to the building being completed in 1970.

The buildings were designed and built by Arup with landscaping for the courtyard and grounds by James Russell. Design 39 Journal- VADS reports that 'the Financial Times award for industrial architecture 1972' was won by 'the new plant at Havant, Hampshire, designed by Arup Associates'.

In terms of social history, the sites links with the development of the computing technology is of significance. Taking account of the above I would consider the Arup buildings to be non-designated heritage assets. It should be noted that building 6000 had been put forward to Historic England for listing. The decision has recently been issued with confirmation that the building was suitable for listing

The current buildings because of their design/construction provenance and social history significance should be considered collectively as non-designated heritage assets. Whilst the existing building are quite plain by today's standards they do represent an era of design and have by their association to Arup a certain level of standing in terms of design. Therefore, any proposed alterations would need to have some gravitas in its own design.

Part demolition of Building 1000

The two bays of the building to be demolished were an original component of the complex and was in situ when the plant received the 1972 Financial Times award for industrial architecture. The building was subsequently extended (by 3 further bays) over time each time replicating the established 'bay' pattern of the building with central brick service 'core' and large open floor space.

From a heritage perspective the demolition of the two original bays would result in the loss of part of a significant local heritage asset which as part of the group of Arup buildings makes a positive contribution architecturally. It also has local distinctiveness, which provides a historic link to the area's link with the high-tech computer industry that once took place on the site. Nonetheless, the two bays in question have been clearly altered internally on a number occasions to suit the needs of companies who have subsequently used the building. I can also understand that the building would only suit a niche area of the rental industrial market as it is a large single storey expanse with limited natural light.

The new design of the elevations is considered appropriate and sympathetic within its context. It will also allow for some further natural light enhancing the internal space. However, replacing the existing building with car parking is disappointing. Whilst provision is made for landscaping, the car parking is relatively non-descript and does not add anything to the site other than providing car spaces which will be lost due to the new flexible industrial units proposed.

A balanced judgement will be needed on this point. The planning officer should also be convinced that there is sufficient marketing evidence in the application to support that the units can't be used.

The NPPF 2019 sets out guidance in relation to non-designated heritage assets:

197. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing appellations that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

198. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

199. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible⁶⁴. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

- 7.93 The loss of the original two bays is considered to detract from the non-designated heritage asset. As such the assessment of whether this is ultimately something that can be supported has several aspects to consider as set out in detail by the Conservation Officer.
- 7.94 The significance of the non-designated heritage asset is set out in the Conservation Officers consultation response. It is noted that whilst the asset has architectural and social history significance the bays to be demolished have been significantly altered internally. As set out in (iv) the building is unsuited to many users and extensive marketing has not resulted in new occupant being secured. There are clearly difficulties in providing a use for the building as it stands.
- 7.95 It should be noted that the current proposals need to be seen in the context of the emerging Draft Havant Borough Local Plan 2036 policy KS10. The supporting text states in 3.136 that: *The site presents opportunities for development through refurbishment and redevelopment of the existing buildings, and rationalisation and consolidation of the existing car parking provision, to free surface parking areas for development.* Whilst this policy carries limited weight it does express the Councils 'direction of travel' in relation to the site. The proposed alterations are considered to enhance the appearance of the remaining building and to enhance the usability of Bay 3 and therefore the longer term future of the remaining part of the building. The Heritage team leader confirms that: *The new design of the elevations is considered appropriate and sympathetic within its context.* The replacement by car parking whilst not enhancing the general setting for the retained buildings is a necessary part of the overall on site parking requirement to serve existing and proposed buildings.
- 7.96 Paragraph 198 of the NPPF sets out requirements to ensure that new development proceeds after the loss of the asset occurs and a phasing condition is recommended to seek to ensure that the demolition does not take place without ensuring that the wider development takes place. It is not considered that a further assessment of the heritage asset is required in relation to paragraph 199 as the application has been accompanied by a Heritage Impact Assessment.
- 7.97 Taking into account the above considerations it is not considered that the loss of two bays of Building 1000 would warrant a refusal of planning permission.

Erection of new flexible use industrial units

- 7.98 With regards to the new buildings, in response to concerns previously raised by the Heritage team leader and planning officer, design changes were made in order to seek to improve the appearance of the new units and to better integrate with the main built complex including Building 6000. In terms of design the applicants desire to retain flexibility of use and to seek to provide a fairly self contained layout for the new units and their future occupants has limited the changes that the applicant has felt able to make.
- 7.99 As a result, there remain reservations in relation to the integration of new built form with the landscaped, campus style of the existing complex. The proposed units continue to have an insular and separate industrial site appearance. This is softened to some degree by the changes made to the elevations including introduction of more glazing, material contrasts and landscaping. It is also noted that the recent Listing Decision in relation to Building 6000 (building not considered worthy of Listing) has meant that there is little heritage impact on this building itself.

7.100 The Heritage Team Leader concludes: *On balance whilst the proposed development would certainly benefit from design amendments I cannot now maintain an objection on heritage grounds.* Given the changes made and the concerns raised in relation to the operational requirements of the units preventing making further changes difficult to achieve, it is considered that the development would have an acceptable impact on the remaining original complex.

New parking layout with associated works to layout and access

7.101 The Heritage Team Leader confirms that *from a heritage perspective I have no objection to these parts of the scheme.*

(vii) Trees/Landscaping

7.102 The proposed development site contains a limited number of on site trees with more significant tree coverage beyond the site especially to the east alongside Langbrook, to the north along the A27, and along part of the western boundary alongside the boundary with adjacent industrial units in Southmoor Lane.

7.103 A tree removal note has been submitted setting out the high level proposals as follows:

Northern car park - six trees are to be removed from the northern boundary of the site. However, these trees are mostly set apart from the thick vegetation between the site and the A23 (correction A27), which is to be retained. Further, and subject to detailed landscape design, there will be a net addition to the number of trees in the vicinity, and a row of replacement trees planted immediately to the south of the trees to be removed.

In addition, there are a number of smaller trees to be removed as part of the car park remodelling, however again there will be a net increase in the number of trees, as a result of the proposals and as illustrated on the application layout plans.

Eastern boundary - two relatively small trees are to be removed from the eastern boundary of the site (see photograph). These two trees are considerably smaller than the taller cluster of trees adjacent to them, which are to be retained as part of these proposals.

Southern car park - a number of amenity trees within the car park must be removed in order to redevelop this part of the site. It is understood that these trees were planted when the car park was built, and follow the relatively narrow landscaped verges between the parking spaces and access routes. It is proposed that, through detailed design, the new employment development will be appropriately landscaped, including new trees, in order to provide a natural interface between development.

7.104 Further details have also been provided in an Arboricultural Method Statement, Tree Protection and Tree Constraints Plans.

7.105 The Council's Arboricultural Officer has considered the proposals and raised concerns in relation to the proposal to fell two category 'A' Norway Maples to the north of the Technology Park Building (Building 1000). A Tree Preservation Order was made in relation to the two Norway Maples and in addition to two Ash trees and a Silver Maple (these latter trees are to be retained). The TPO has not been confirmed. The other trees shown to be removed are generally small and heavily pruned trees typical of car park planting and not suitable to be retained by a TPO.

7.106 The concern over the removal of the Norway Maples has been discussed in detail with the development team. The trees are positioned in an area which is to form a link route to the north of Building 1000 to the existing and expanded parking area to the east of the retained part of that building.

The agent has commented: The proposed link is a vital part of the redevelopment proposals, and will allow for significantly improved traffic flows through the site, as well as ensuring that more parking spaces are easily accessible from the western entrance (in the context of the proposal above). The current proposal will also convert part of the existing fire tender route (currently grasscrete or equivalent) to a fully serviceable private road.

7.107 Changes in levels and other on site constraints and requirements mitigate against an alternative solution. Therefore, it has been concluded that the retention of these trees is not achievable in this case notwithstanding their environmental and landscape merits. Given this conclusion mitigation in relation to further planting has been sought and provided. This is as follows:

We are proposing to provide, in compensation for the loss of the two Norway Maples, a group of 5 different height trees of Beech, Field Maple and Oak or Maple with a girth of 20-30mm (details on the precise type of tree can be reserved by a condition). These will give range of colour and height.

In term of size/maturity, we believe that the best choice would be semi-mature trees with an ideal girth of 20-30cm. These will establish better, settle faster and provide good strong growth. For the location, we propose placing them as indicated in the included drawing ref 4046A-200 Rev F. They will then be viewed by people arriving into the car park and via the footpath, helping to create a better ecological amenity for a wider public than the original position of the lost Norway Maples

7.108 A condition is recommended to ensure protection of trees that are to be retained.

7.109 Overall it is considered that the development retains trees where possible and operationally practical and provides additional planting to mitigate losses where appropriate. Landscaping and tree protection conditions are recommended.

(viii) Ecology

7.110 With regard to ecology impacts these fall into on and off site impacts and these are considered below:

On Site

7.111 The application has been accompanied by a Phase 1 Habitat and Species Survey and a Bat Emergence Survey Report

The survey report concluded:

The proposed construction zones are comprised of buildings, mown amenity grassland and hard standing with low ecological value and occasional scattered trees.

Building 3, proposed for a part demolition, has a low potential to support roosting bats and a bat emergence surveys have been recommended. Buildings 1,2,4, or 7 also have a low potential to support roosting bats although they are not proposed to be

impacted externally.

If any protected species are found during the proposed work, work should be stopped immediately, and an ecologist must be contacted for advice.

7.112 The Council's Ecologist has provided detailed comments summarised below:

The majority of the site comprises modern buildings with associated hard surfacing. Vegetation comprises areas of amenity-type grassland, planted ornamental shrubs and herbaceous species as well as woodland at the eastern and western edges. A stream corridor runs along the site's eastern boundary and a small ornamental pond is present.

The site overall is generally considered to be of limited ecological value and I would agree with this assessment. Further bat surveys of one structure, Building 1000, recorded no evidence of roosting bats and no further bat survey works are considered necessary.

An area of grassland to the south of the gymnasium is suspected of being of botanical interest, with orchid species occurring: the presence of orchid species indicates that the grassland is likely to be of greater interest. Further investigation of this area of grassland has been recommended. Again, any updating information that may require the assessment to be amended should be provided prior to determination.

Following submission of this additional information, we would expect that firmer details of all mitigation, compensation and enhancement measures be submitted. These should be sufficiently detailed (i.e. not recommendations but firm proposals that can be delivered) so that the LPA is able to secure their delivery by condition.

Following submission of this additional information, we would expect that firmer details of all mitigation, compensation and enhancement measures be submitted. These should be sufficiently detailed (i.e. not recommendations but firm proposals that can be delivered) so that the LPA is able to secure their delivery by condition.

A Biodiversity Enhancement Plan was subsequently submitted and this set out:

- 1. Pre-construction work includes the translocation of an area of grassland supporting orchids which cannot be protected in situ.*
- 2. Native tree planting is proposed as an enhancement measure for wider wildlife benefits targeting invertebrates that in turn provide value for foraging birds and bats.*
- 3. To provide a net increase in bat roosting habitats, bat boxes are proposed to be installed across trees upon the site's boundaries. New nesting opportunities will also be provided for birds, specifically swifts and house sparrows.*
- 4. Post construction management.*

The Council's Ecologist makes recommendations in relation to the transplant area in relation to orchids and this will be secured by condition. The future management regime for the transplant area will be secured through Landscaping conditions.

Overall it is concluded that subject to appropriate conditions including biodiversity enhancement measures, the on site ecological impacts are limited and can be appropriately mitigated.

Off Site

7.113 The site is located within 400m of the Chichester and Langstone Harbour SPA and Langstone Harbour SSSI, and within 700m of the Solent SAC. Natural England have been consulted in relation to potential impacts on the Nationally and Internationally designated sites. They conclude that:

Due to the distance of the site from the sensitive habitats, the type of development proposal and the existing surrounding development acting as a noise and visual buffer, it is Natural England's opinion that the proposal is not likely to have a significant impact on the protected sites and associated species and therefore we have no objection to the proposal in regards to this aspect.

7.114 It is recognised that the adjacent watercourse Langbrook and surface water receptors are an important ecological resource in their own rights and have the potential to act as a route to the protected environments of the Harbour. The Environment Agency raise no objections to the proposed development following the submission of a Flood Risk Assessment.

7.115 The Local Lead Flood Authority raise no objections although it is noted that they do not comment on the fluvial systems outside their remit.

7.116 The Councils Environmental Control Officer has commented in detail in relation to the proposals including in relation to potential pollution to watercourses and drainage systems. Conditions have been recommended in relation to contamination risks. A drainage condition in relation to Surface Water is also recommended.

(ix) Sustainable design

7.117 In relation to sustainable design the Planning Policy Consultation Response provides the following comments:

Non-residential development over 500 sq. m is expected to meet the BREEAM 'Very Good' standard, unless proven to be financially or technically unviable in line with Policy CS14 of the adopted Core Strategy. Policy E12 of the emerging HBLP 2036 sets out the BREEAM level to be achieved for different floorspace thresholds for non-residential development.

Proposals of 1,000 sq. m or more of non-residential development are expected to meet BREEAM 'Excellent'.

The applicant has submitted BREEAM Pre-assessments for both the new build Industrial units and the works to Building 1000, which outline the strategy for the proposals to achieve a minimum of a 'Very Good' rating in line with the requirements of Policy CS4. However, the new industrial floorspace would create more than 1,000 sq. m and would therefore be expected to meet the higher rating of 'Excellent'.

The pre-assessment indicates that the development has an anticipated score of 60.5% but could potentially achieve a score of 66.9% - which would fall slightly short of 70% needed to achieve an 'Excellent' rating. Whilst the future occupiers of this building are not yet known, the emerging Plan requirement to achieve an 'Excellent' rating must be afforded limited weight. It is therefore recommended that the applicant further explore credits for the new industrial accommodation to achieve the 'Excellent' rating.

Going forwards, the relevant assessment should be submitted at the interim (design stage) and final (post completion stage) and secured through appropriate conditions to demonstrate how the requirements of the policy would be met. Conditions would be

required to secure this.

7.118 The applicant has provided a further BREEAM rating document that concludes that:

Despite best endeavours the scheme cannot reach a BREEAM rating of Excellent in a sustainable manner. However high levels of sustainability will be included within the design as demonstrated by BREEAM minimum standards of Excellent being targeted.

The current adopted local policy requires a BREEAM Very Good rating for such type of developments therefore the scheme is compliant.

It is considered that the proposed development which includes the provision of a Very Good rating, PV units on the new buildings and other environmental enhancements through the Ecological mitigation and landscaping can be considered compliant with existing policy subject to the imposition of appropriate conditions.

(x) Other Environmental impacts

Air Quality

7.119 Impacts on air quality have been considered by the Councils Environmental Officer who has concluded that:

Ultimately, the 'headline' is that the proposed development is expected to yield a reduction in whole site trip generation relative to its consented landuse (at 100% occupancy). Conceptually, an adverse air quality impact of material significance cannot arise from a reduction in traffic unless there is a substantial shift in vehicle type, routing bias, or temporal distribution of the traffic generated.

For this reason, I do not require the amendment of the air quality report, and can accept its overall conclusion on a broad conceptual basis, subject to Hampshire County Highways being satisfied in the robustness of the junction capacity assessment & the impact shown being either non-adverse or of acceptably low magnitude.

Contamination

7.120 Given the historic uses on site and the sensitivity of the protected harbour environments detailed conditions are recommended in relation to contamination matters as requested by the Councils Environmental Officer.

Electric Charging Points

7.121 With regard to electric charging points, the existing site has 8 car parking spaces equipped with Tesla superchargers which will be retained. Emerging policy in the Havant Borough Local Plan 2036 Pre-Submission Draft ING3 requires EV charging points at a ratio of 10%. A condition to secure 24 charging points for the new industrial units is recommended. It is not considered that given the status of the emerging local plan with its limited weight to be afforded that EV points can be secured for the other new parking areas.

8 Conclusion

8.1 In conclusion, the principle of the development is supported by both adopted and

emerging policy. The impact of the development on the character and appearance of the area is considered acceptable in the context of the wider industrial context of the site and bearing in mind the siting of the new buildings.

- 8.2 The impacts on residential amenity have been considered and noise reports and HGV routing assessed. It is considered that additional impacts from the development would be limited and acceptable.
- 8.3 The application would enhance the business offer available at LTP providing modern and flexible accommodation for a range of potential occupants. This would provide additional employment opportunity at the site supporting the Borough's economy and supporting this critical part of the areas business offer in line with the Councils policies.
- 8.4 Highway impacts have been considered in detail with Hampshire County Council the Highways Authority. The sensitivity of the Langstone Road access and impacts on the highways network have been assessed in detail. It is considered that subject to conditions and the associated S106 Agreement, these impacts will be mitigated and permission can be recommended.
- 8.5 Flood Risk and Drainage issues have been assessed by the Statutory Consultees and subject to conditions are considered to have been suitably addressed.
- 8.6 The impacts on heritage assets have been considered in detail with the Councils Conservation Officer and amendments to the new buildings have been made. A detailed assessment of building 1000 has been considered in relation to its suitability for business use. On balance it is considered that the package of development addresses the heritage assets on site.
- 8.7 In relation to trees and landscaping, the proposals have been amended where possible to improve landscaping and mitigate for tree loss. Subject to conditions the development is considered acceptable.
- 8.8 Ecological impacts are addressed and mitigated as appropriate, conditions are recommended in relation to potential contamination issues. The proposals have been conditioned to meet adopted sustainability requirements with further enhancements in relation to EV charging for the parking associated with the new units and PV units to the roof. Finally, other environmental impacts are addressed as necessary.
- 8.9 Overall, the development is considered to be acceptable and will provide important additional business opportunities to LTP and the Borough.

9 RECOMMENDATION:

That the Head of Planning be authorised to **GRANT PERMISSION** for application APP/19/00703 subject to the S106 Agreement dated 22nd July 2020 and subject to the following conditions:

- 1 The development must be begun not later than three years beginning with the date of this permission.
Reason: To comply with the requirements of Section 91 of the Town and

Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

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

Plans

Site Location Plan Drawing No.0100 Rev C
Site Plan Drawing No. 0110 Rev F
Site Plan with Footpaths Drawing No. 0111 Rev A
Proposed Layout Plan Opt 02 Drawing No.0152 Rev N
Car Park Layouts Sheet 1 Drawing No. 0155 Rev E
Car Park Layouts Sheet 2 Drawing No. 0156 Rev E
Parking Access and Management Drawing No. 0158 Rev A
Proposed Ground Floor Plan (B1000) Drawing No. 4046A 200 Rev F
Units 01-05 Floor Plans Drawing No. 4046C 0200 Rev D
Units 01-05 Elevations and Typical Section Drawing No. 0205 Rev E
Units 06-09 Floor Plans Drawing No. 0210 Rev F
Units 06-09 Roof Plan Drawing No. 0211 Rev E
Units 06-09 Elevations and Typical Section Drawing No. 0215 Rev D
Units 10-12 Floor Plans Drawing No. 0220 Rev F
Units 10-12 Roof Plan Drawing No. 0221 Rev D
Units 10-12 Elevations and Typical Section Drawing No. 0225 Rev D
Sit Section and Elevation Analysis Drawing No. 0230
Proposed Elevations Drawing No. 300 Rev A
Drainage Strategy General Arrangement Sheet 1 of 2 Drawing No. 4400 Rev P1
Drainage Strategy General Arrangement Sheet 2 of 2 Drawing No. 4401 Rev P1
Summary of Existing Surface Water Drainage for Proposed Development Areas Drawing No. 4600 Rev P1
100 Year Modelled Flood Levels – Created 16 September 2019
Indicative Drainage Details Sheet 1 of 2 Drawing No. 400410 Rev P1
Indicative Drainage Details Sheet 2 of 2 Drawing No. 400411 Rev P1

Documents

Design and Access Statement July 2019
Design and Access Statement Addendum October 2019
Planning Statement Ref 18-02501 dated 5 July 2019
Transport Assessment 20428-04c 3rd July 2019
Framework Travel Plan SKP/20428-05e Framework TP 11th December 2019
Response to Consultees on transport and highways matters 23rd October 2019
RJM/20428-06e Response
Further Response to Hampshire County Council re Highways Matters 20428-07b 4th March 2020
Non Technical Summary (Highways) 20428-08a 7th April 2020
Phase 1 Habitat and Species Survey Project No P3133 Rev 01 28th June 2019
Bat Emergence Survey Report Project No.: P3133 28th June 2019
Biodiversity Enhancement Plan Project No: P3133 Rev 1 dated 22nd October 2019
Heritage Impact Assessment Ref: edp5537_r002b June 2019
Preliminary Geo-Environmental Risk Assessment Project No. 19-0687.01 Issue No.2 July 2019
Flood Risk Assessment and SUDS Strategy Ref 8/1982 Rev C 2nd July 2019
Drainage and Flood Risk Assessment Parts 2, 3 and 4
Clancy Consulting Letter Ref. 8/1982/LLFA dated 23rd September 2019

Clancy Consulting Letter Ref. 9/1982/FLOOD2 dated 7th October 2019
 Clancy Consulting Letter Ref. 8/1982/FLOOD dated 29th August 2019
 Calculation Package and Design Philosophy for Drainage Ref: 8/1982 Rev B 25th
 October 2019
 Manhole Schedule Area 1 Drawing No. 4415 Rev P1
 Manhole Schedule Area 2 Drawing No..4416 Rev P1
 Manhole Schedule Area 3 Drawing No. 4417 Rev P1
 Manhole Schedule Area 4 Drawing No. 4418 Rev P1
 BREEAM Pre-assessment (New Industrial) Ref: 5549-CBC-RGV-RP-Z-001-P02
 Rev 2 26th June 2019
 BREEAM Pre-Assessment (Building B1000) Ref: 5548-CBC-RGV-RP-Z-002-P02
 Rev. 2 26th June 2019
 BREEAM Rating Doc Ref. 5549 Design note – BREEAM rating Rev 2 23rd
 October 2019
 Air Quality Assessment Ref AQ107578R1 October 2019
 Acoustic Report – Preliminary Planning Compliance Review Report
 18980.PPCR.01 Rev D
 Arboricultural Method Statement Ref. 1087.bjh.Sept19
 Tree Removal Note 2nd August 2019
 Tree Protection Plans
 Tree Constraints Plans
 Rapleys Letter Ref HJOA/18-02501 (Parking/Access and Protected Trees etc)
 19th December 2019

The Following were considered in relation to the application:

Industrial Park Signboard Drawing No. SK (Signage likely to require
 Advertisement Consent)
 Artistic Impression Drawing No. 301
 Marketing Strategy Report Area 1, 2 and 3 Building 1000 Ref.ANH/cec

Reason: - To ensure provision of a satisfactory development.

- 3 No development shall take place until plans and particulars setting out a phased programme for implementation of the development have been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out in accordance with the approved phasing programme unless an alternative is first agreed in writing with the Local Planning Authority.
Reason: To ensure adequate parking is provided on site in advance of the first use of the proposed new flexible use industrial units and that adequate foul drainage capacity is available having due regard to policies CS15 and DM14 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.
- 4 No development shall take place on a phase of the development until details of existing and finished floor and site levels relative to previously agreed off-site datum point(s) for that phase have been submitted to and approved in writing by the Local Planning Authority. The development shall be undertaken in accordance with the approved details.
Reason: To ensure that the development has an acceptable impact on the character and appearance of the area having due regard to policies CS16 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.
- 5 No development shall take place on a phase of the development until all trees that are to be retained within or adjacent to the part of the site subject to that

phase have been enclosed with temporary protective fencing in accordance with BS:5837:2012 'Trees in relation to design, demolition and construction. Recommendations'. The fencing shall be retained throughout the period of works relative to that phase and no activity prohibited by BS:5837:2012 shall take place within such protective fencing during the construction period.

Reason: To safeguard the continued health and presence of such existing vegetation and protect the amenities of the locality and having due regard to policies CS11 and CS16 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

- 6 No development shall take place on a phase of the development until plans and particulars specifying the following matters relative to that phase have been submitted to and approved in writing by the Local Planning Authority (in consultation with Hampshire County Council Highways Authority):

- (i) A Construction Traffic Management Plan. This shall include construction traffic routes and their management and control, parking and turning provision to be made on site, measures to prevent mud being deposited on the highway, adequate provision for addressing any abnormal wear and tear to the highway, and a programme for construction.
- (ii) The provision to be made within the site for contractors' vehicle parking during site clearance and construction of the development;
- (iii) The provision to be made within the site for a material storage compound during site clearance and construction of the development.

Thereafter, throughout such site clearance and implementation of the relevant phase of development, the approved construction traffic management plan shall be complied with and the approved parking provision and storage compound shall be kept available and used only as such.

Reason: To safeguard the amenities of the locality and in the interests of highway safety and having due regard to policies CS16, CS20, DM10 and DM12 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

- 7 With the exception of demolition works, no development hereby permitted shall commence on a phase of the development until plans and particulars specifying the layout, depth and capacity of all foul and surface water drains and sewers proposed to serve the same, and details of any other proposed ancillary drainage works/plant (e.g. pumping stations) for that phase have been submitted to and approved in writing by the Local Planning Authority. The surface water drainage scheme for each phase shall specify the measures for ensuring that potential pollutants from the site do not impact the wider water environment. Unless agreed otherwise in writing by the Local Planning Authority, the relevant phase of the development hereby permitted shall not be brought into use prior to the completion of the implementation of all such drainage provision for that phase in full accordance with such plans and particulars as are thus approved by the Authority.

Reason: To safeguard the amenities of the locality and ensure that all such drainage provision is constructed to an appropriate standard and quality to reduce flood risk and protect the wider water environment having due regard to policies CS15, CS16 and DM10 of the Havant Borough Local Plan (Core

Strategy) 2011 and the National Planning Policy Framework.

- 8 The development hereby permitted shall be carried out in accordance with the Biodiversity Enhancement Plan (The Ecology Co-op, October 2019). In addition, prior to the commencement of developing the new industrial units full details of the translocation of the species-rich grassland containing orchid species and the long term management and maintenance of the translocation area shall be submitted to and approved in writing by the Local Planning. The translocation shall take place in accordance with timing provisions as may be approved as part of the details. The translocation process itself and subsequent management and maintenance of the translocation site shall thereafter take place in accordance with the approved management and maintenance details. The details of the translocation area and its management and maintenance shall also be shown on the detailed landscaping plan required in accordance with condition No.13.

Reason: In the interests of biodiversity and the protection of habitat having due regard to policies CS11 and DM8 of the Havant Borough Local Plan (Core Strategy) 2011 the Wildlife and Countryside Act 1981 (as amended) and the National Planning Policy Framework.

- 9 Prior to the commencement of any specific phase of development approved by this planning permission (other than demolition, site clearance, or any other date or stage in development as may be agreed in writing with the Local Planning Authority), an assessment of the nature and extent of contamination at the relevant part of the site, whether originating from within or outside the curtilage, shall be submitted to and approved in writing by the Local Planning Authority.

The assessment may comprise separate reports as appropriate, but shall be undertaken by competent persons and unless specifically excluded in writing by the Local Planning Authority, shall include;

1) An intrusive site investigation based on the proposals outlined within the Preliminary Geo-Environmental Risk Assessment Re'-19-0687.01 (section 6.0); to provide sufficient data and information to adequately identify & characterise any physical contamination on or affecting the site, and to inform an appropriate assessment of the risks to all identified receptors.

2) The results of an appropriate risk assessment based upon (1), and where unacceptable risks are identified, a Remediation Strategy that includes;

- appropriately considered remedial objectives,
- an appraisal of remedial &/or risk mitigation options, having due regard to sustainability, and;
- clearly defined proposals for mitigation of the identified risks, and;

3) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out any Remediation Strategy required under (2) are complete, identifying any requirements for longer-term monitoring of pollutant linkages, maintenance of engineered mitigation measures, and arrangements for contingency action.

All elements shall be adhered to unless agreed in writing by the Local Planning Authority.

Reason: Having due regard to policies CS11 and DM10 of the Havant Borough Adopted Core Strategy (2011) and DM17 of the Havant Borough Local Plan (Allocations) (2014) and the National Planning Framework, Contamination may be present at the site as a result of previous land uses (& / or activities) on site and in the vicinity, that could pose a risk groundwater & local surface waters (ecology), to the proposed buildings, and future occupiers of the site.

- 10 Prior to the commencement on a phase of the development (excluding demolition and temporary works), a Draft Design Stage Assessment demonstrating that the relevant part of the development will achieve at minimum 'Very Good' against the BREEAM Standard, shall be submitted to and agreed in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To ensure the development contributes to sustainable construction in accordance with policy CS4 of the Havant Borough Local Plan (Core Strategy) 2011.

- 11 Prior to the commencement of the new industrial units full details of the Electrical Vehicle (EV) Charging points, shall be submitted to and approved in writing by the Local Planning Authority. The details shall demonstrate that EV charging points are provided for the new car parking areas and that the development will accommodate 24 EV charging points. The details shall include the location of the EV charging points and a full specification of the materials to be used externally on the Charging points. Only the materials so approved shall be used, in accordance with any terms of such approval.

Reason: To ensure that the development provides appropriate facilities for Electric Vehicles in the interests of the environment, air quality and that the appearance of the development is satisfactory having due regard to policies CS16 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and Policy IN3 of the Pre-Submission Havant Borough Local Plan 2036 and the National Planning Policy Framework.

- 12 Prior to the commencement of any phase of the development measures relative to that phase for the protection of public sewers within 5 metres of any work being carried out shall be submitted to and approved in writing by the Local Planning Authority in consultation with Southern Water. The development shall thereafter be carried out in accordance with the approved measures.

Reason: To ensure the protection of drainage apparatus having due regard to policies CS15 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

- 13 With the exception of demolition and temporary works, no development hereby permitted shall be commenced on any phase until a more detailed soft landscaping scheme for all open parts of the relevant phase not proposed to be hardsurfaced has been submitted to and approved in writing by the Local Planning Authority.
Such scheme shall specify the proposed finished ground levels in relation to the existing levels, the distribution and species of ground cover to be planted, the positions, species and planting sizes of the trees and shrubs to be planted and/or retained, bulbs and any areas of turfing and seeding and timing provisions for completion of the implementation of all such landscaping works.
The details shall also specify the transplantation area of the species-rich grassland containing orchid species and the long term management and maintenance proposed.

The implementation of all such approved landscaping shall be completed in full accordance with such approved timing provisions. Any tree or shrub planted or retained as part of such approved landscaping scheme which dies or is otherwise removed within the first 5 years shall be replaced with another of the same species and size in the same position during the first available planting season.

Reason: To ensure the appearance of the development is satisfactory and having due regard to policies CS11, CS16 and DM8 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

- 14 With the exception of demolition and temporary works, no development hereby permitted shall commence on any phase until a specification of the materials to be used for the surfacing of all open parts of the site within that phase proposed to be hardsurfaced has been submitted to and approved in writing by the Local Planning Authority. The submitted details shall include:

fully annotated plans at sufficient scale that comprise the proposed range of coloured and textured surfacing treatments, which identify:

- hard surfacing material type / product reference and colour
- laying bond
- edging or kerb detail / type
- Further details on building material specification for the development requiring submission including material type, product reference and colour

The development hereby permitted shall not be brought into use until the implementation of all such hardsurfacing has been completed in full accordance with that specification.

Reason: In the interests of the amenities of the locality and having due regard to policies CS16, and DM8 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

- 15 Notwithstanding any description of materials in the application, with the exception of demolition and temporary works, no development shall take place until samples or a full specification of the materials to be used externally on the building(s) within that phase have been submitted to and approved in writing by the Local Planning Authority. Such details shall include the type, colour and texture of the materials.

Only the materials so approved shall be used, in accordance with any terms of such approval.

Reason: In the interests of the amenities of the locality and having due regard to policy CS16 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

- 16 Prior to the occupation of any relevant phase of the permitted development, any verification report for that phase required in accordance with condition 9 shall be submitted to and approved in writing by the Local Planning Authority.

The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan, and must demonstrate that site remediation criteria have been met. Where longer-term monitoring of pollutant linkages is identified as being necessary, the report shall clearly set out plans for monitoring, provision for maintenance, relevant triggers and contingency actions (a 'long-term monitoring and maintenance plan').

The long-term monitoring and maintenance plan shall be implemented as

approved.

Reason: Having due regard to policies CS11 and DM10 of the Havant Borough Adopted Core Strategy (2011) and DM17 of the Havant Borough Local Plan (Allocations) (2014), Contamination may be present at the site as a result of previous land uses (&/or activities) on site and in the vicinity, that could pose a risk groundwater & local surface waters (ecology), to the proposed buildings, and future occupiers of the site.

- 17 The new industrial units shall not be occupied and the new parking spaces in front of Bay 3 of Building 1000 shall not be used until:

- Details of the design of the proposed barriers; and
- A Management Plan for the proposed traffic barriers within the site;

have been submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented before any of the new industrial units are occupied, or the new parking spaces in front of Bay 3 of Building 1000 are used, whichever is the earlier, and retained in perpetuity.

The traffic barriers shall prevent the new industrial units and parking accessed to the west of the barriers being utilised by vehicles from Langstone Road between 07.30am and 09.00am.

Reason: In the interests of highway safety and operation and having due regard to policies CS20 and DM12 and the National Planning Policy Framework.

- 18 The new industrial units shall not be brought into use unless and until signage to direct HGV movements as depicted on DTA drawing 20428-05 HGV Routing restrictions has been erected in accordance with the details shown. The signage shall thereafter be retained and maintained unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that HGV movements are directed to limit access from Langstone Road in the interests of traffic flow and highway safety having due regard to policies CS20 and DM12 of the Havant Borough Local Plan (Core Strategy) and the National Planning Policy Framework.

- 19 Each phase of the development hereby permitted shall not be brought into use unless and until details of cycle storage, in the quantum and position illustrated on drawings 4046C-0110_F and 4046A-200_F, with the exception of those shown for unit 12 are submitted to and approved in writing by the Local Planning Authority.

In relation to unit 12, details of 12 long stay and 5 short stay cycle parking spaces shall be submitted to and approved in writing by the Local Planning Authority.

The approved cycle parking provision shall thereafter be provided prior to the relevant phase of the development being brought into use and thereafter maintained in accordance with the approved details.

Reason: To ensure the provision of sustainable transport options and having due regard to policy DM14 of the Havant Borough Local Plan (Core Strategy) 2011 Havant Borough Parking Standards SPD 2016 (as amended) and the National Planning Policy Framework.

- 20 The Norway Maple trees shown to be felled on the Tree Protection Plan as T41

and T42 and listed in the Arboricultural Method Statement Ref. 1087.bjh Sept 19 shall not be removed until full details and specifications of replacement tree planting for the Norway Maple trees to be felled has been submitted to and approved in writing by the Local Planning Authority. The approved replacement planting shall be carried out in the first planting season following approval of the details. Any trees or shrubs planted or retained in accordance with this condition which are removed, uprooted, destroyed, die or become severely damaged or become seriously diseased within 5 years of planting shall be replaced within the next planting season by trees or shrubs of similar size and species to those originally required to be planted.

Reason: To conserve and safeguard the visual amenities of the locality and having due regard to policies CS11 and CS16 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

- 21 Within 6 months of any phase of the development first becoming occupied, written documentary evidence proving that the relevant phase has achieved at minimum Very Good against the BREEAM Standard in the form of post construction assessment and certificate as issued by a legitimate BREEAM certification body shall be submitted to the Local Planning Authority for its approval.

Reason: To ensure the development contributes to sustainable construction in accordance with policy CS4 of the Havant Borough Local Plan (Core Strategy) 2011.

- 22 The car parking, servicing and other vehicular access arrangements shown on the approved plans to serve the development hereby permitted shall be made fully available for use prior to the new industrial units being first brought into use and shall be retained thereafter for their intended purpose, unless alternative arrangements are approved by the local planning authority in the context of a phasing plan pursuant to condition 3.

Reason: In the interests of highway safety and having due regard to policy DM14 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

- 23 The external sound level emitted from plant, machinery or equipment at the development shall be equal or lower than the representative background sound level, with noise levels assessed (if necessary) in accordance with BS4142:2014 at the nearest and/or most affected noise sensitive premises.

Reason: To protect the amenity of the nearest residential receptors having due regard to policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

- 24 No externally visible or audible plant, machinery or structures required for ventilation or filtration purposes shall be installed at the premises until and unless details of the external appearance and acoustic and odour prevention performance of the same have been submitted to and approved in writing by the Local Planning Authority.

Reason: To safeguard the amenities of the locality and occupiers of nearby property and having due regard to policies CS16 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

- 25 Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987, (as amended) and any Town and Country Planning (General Permitted Development) Order, the new industrial buildings hereby permitted

shall only be used as flexible B1(c), B2 and B8 uses; and for no other purposes within the Use Classes Order 1987 (as amended).

Reason: To accord with the terms of the application in the interests of amenity and having due regard to Policies CS16 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

26

Notwithstanding the provisions of the General Permitted Development Order (As Amended) no additional first floor mezzanine floorspace shall be created within the development hereby permitted.

Reason: To ensure that adequate car and cycle parking provision is provided on site having due regard to policy DM14 of the Havant Borough Local Plan (Core Strategy) 2011, Havant Borough Council Parking SPD 2016 (partly updated 2019) and the National Planning Policy Framework.