

Planning Application Response of Planning Policy / Urban Design

Application No:	APP/18/00224
Site Address:	Dunsbury Park, Fitzwygram Way, Havant, PO9 4EE
Development:	Approval of Reserved Matters in respect to Phase 1 Plot 3b of APP/15/00732 (new employment uses, hotel and access road) comprising construction of 3,528 sqm B1(c)/B2/B8 commercial premises for plot access, layout, scale & appearance and Condition B5 Other Matters criteria A to H inclusive
Case Officer:	Daphney Haywood
Comments by:	Jade Ellis
Date of Comments:	10 th May 2018

Policy Status:

The Local Plan (Core Strategy) and the Local Plan (Allocations) provide the development plan for the borough. The Local Plan Housing Statement (LPHS) is also a material consideration.

A Draft (Regulation 18) version of the [Havant Borough Local Plan 2036](#) was also subject to public consultation from 8 January to 16 February 2018.

Background:

The 2014 outline consent limited the proportion of B8 Storage and Distribution uses to no more than 20% of the total employment floorspace. The available evidence at the time indicated that B8 Storage and Distribution uses tend to generate less than half the job density of other employment floorspace (B1 and B2 uses). This has been subsequently varied by a section 73 planning permission APP/15/00732 to allow a greater amount of B8 floorspace (a total of 18,534 sqm) across the site and thereby enabling the Fat Face distribution centre to come forward for development on the site.

The emerging policy in the Draft Local Plan does not set a maximum proportion of B8 floorspace recognising increasing employment densities and trend towards more modern distribution facilities now comprising elements of B1, B2 and B8 uses. It does however, indicate the following criteria is relevant in permitting B8 storage and distribution operations:

g. The operations or use(s) will support an employment density of 70 sqm per person or less; or

h. The development proposals will provide a range of employment opportunities with different skill levels which balance with the number of warehouse staff.

The applicant has since applied to remove the B8 restriction on the outline consent (reference APP/17/01324) reflecting the Council's direction of travel in the Draft Local Plan – though this application has yet to be determined.

Principle of development:

Policy CS18 of the Core Strategy identifies Dunsbury Park as a key strategic employment site. The site is reaffirmed as a business gateway of local and sub-regional importance in the Draft Local Plan with the potential to deliver a substantial amount of new employment floorspace up to 2036 under Policy KS6.

The proposed unit would be speculatively developed by Portsmouth City Council (the landowner and developer) with no current secured occupier. It is assumed the application description is flexible to include B8 uses so that the plot could be marketed to a wide range of occupiers. This means that it is not possible to determine the employment density of the floorspace.

Nevertheless, the total amount of employment floorspace proposed would not exceed 18,534 sqm when combined with the permitted warehouse floorspace in the Fat Face distribution centre. The scheme is also in line with the requirements of the original outline planning permission (APP/12/00338) as varied through APP/15/00732. A policy objection would not therefore arise.

Efficient use of resources:

As the applicant has highlighted in the Design & Access Statement (DAS), condition B5 (d) of the outline planning permission for Dunsbury Park (APP/12/00338) requires a BREEAM level of Excellent to be achieved across the plots. The DAS also indicates a BREEAM pre-assessment has been undertaken and demonstrates that a “Very Good” rating is achievable, but as the proposals are being developed speculatively, it has not been possible to consider any tenant-related items at this pre-assessment stage. A BREEAM pre-assessment estimator has been submitted which indicates a ‘very good’ level would be achieved. This would clearly not comply with the condition. It should also be noted that the targeted score is some way short of the threshold for excellent.

The energy strategy set out in the Design and Access Statement follows the energy hierarchy, which is sensible and welcomed. However, it is unclear about the energy strategy with confusing wording in section 7.4 (“Whilst the ‘lean’ and ‘clean’ measures outlined above would provide the necessary improvements in energy efficiency to meet the relevant requirements of the Building Regulations (Part L2A), further energy savings would be achieved without the implementation of renewable or Low carbon technology. As such a number of technologies have been appraised”). On the basis that LZC energy is not proposed, it is unclear why an appraisal of technologies would have taken place. However, provision of LZC technologies may be needed in order to improve the overall BREEAM score.

The Design and Access Statement suggests that as the proposals are being developed speculatively and being designed to “shell and core” stage, it has not been possible to achieve a higher rating. In this respect, Appendix D of the [BREEAM UK New Construction Technical Manual](#) provides for non-fitted, speculative new buildings to be assessed using the scheme. It is acknowledged the solutions are either impractical or would result in credits lost. Nevertheless, to justify a deviation from the standard required in condition B5 (d), we would expect a concise feasibility study to be submitted going through each issue where full credits are not being achieved justifying why it would not be feasible (rather than viable) to do so. This is in line with the approach that was taken forward with the previous reserved matters application at Dunsbury Park. This justification should also highlight the energy strategy

Summary

No policy objection is raised in proposed in relation to Class B8 use. However, in terms of the condition B5(d), there would be a need to assess whether a deviation from the condition is justified once the applicant has provided further information.