

Planning Statement

Proposed Food Store

Land at Manor Road, Hayling Island

June 2017

Turley

Contents

1.	Introduction	3
2.	Site and Surroundings	4
3.	The Proposed Development	6
4.	Planning Policy Framework	10
5.	Planning Considerations	13
6.	The Planning Balance	22
Appendix 1: Planning Policy Review		24
Appendix 2: Havant Borough Council Pre-application Response		31

Client

Lidl UK GmbH

Our reference

LIDW3001

June 2017

1. Introduction

1.1 This Planning Statement has been prepared by Turley, on behalf of Lidl UK GmbH ('Lidl'), in support of a full planning application for the erection of a Class A1 discount retail food store at Land at Manor Road (A3023), Hayling Island.

1.2 The application proposal is described as follows:

"Erection of a food retail store (Class A1) with associated access, car parking, servicing and landscaping"

1.3 The application site is located outside of the urban area of Hayling Island. However, this statement demonstrates that when the site's context is considered along with the benefits the proposed store will bring, the planning balance falls firmly in favour of the proposed development. This Planning Statement also addresses relevant material considerations associated with the proposed development. Therefore, it should be read in conjunction with other documents and drawings submitted in support of this application.

Report Structure

1.4 The remainder of this Statement is structured as follows:

- Section 2 – Site and Surroundings;
- Section 3 – The Proposed Development;
- Section 4 – Planning Policy Framework;
- Section 5 – Planning Considerations; and
- Section 6 – The Planning Balance.

2. Site and Surroundings

- 2.1 A full contextual analysis of the site and its surroundings can be found within the submitted Design and Access Statement. This section seeks to provide a summary to assist with the understanding and assessment of the proposed development.

The Application Site

- 2.2 In response to anticipated demand, Lidl has been searching for a suitable site to develop a food store on Hayling Island for a number of years. The company has explored numerous site options on the Island but none have been identified as being suitable or available, a matter explored further within the submitted Retail Assessment. The application site offers a rare opportunity to bring forward a discount food store on the Island in a location which is adjacent the main urban area.
- 2.3 The application site is located on the southern part of Hayling Island on Manor Road (A3023) near its junction with Church Road. It is the southern half of Hayling which is most populated, containing the majority of services and facilities including those for tourists and visitors.
- 2.4 The site is approximately 1.16 ha in size, generally level and comprises a field currently used for grazing (Grade 3a Agricultural Land). Vehicular access is currently from Manor Road.
- 2.5 Trees and woodland line the eastern, southern and western boundaries. The northern boundary consists of a post and wire fence, hedgerow and a small number of trees. There is a TPO within the south east corner of the site.
- 2.6 The site falls outside of, but adjacent to the 'urban area' of Hayling Island, as defined on the adopted Havant Borough Council Proposals Map. It is designated as 'Uncertain Site for Brent Geese and Waders' and is located within Flood Risk Zones 1, 2 and 3.

Surroundings

- 2.7 To the north of the site is Manor Road, from which access is proposed, and beyond this is agricultural land and associated buildings and a small number of detached properties. The A3023 is the main route to the mainland leading to a single road bridge onto and off the Island which is often congested.
- 2.8 To the east is a belt of trees (protected by a group TPO) and Church Road, which links the site to Mengham/Gable Head district centre, the main retail centre on the Island, some 800m to the south. Beyond Church Road are residential properties located within the defined Urban Area of Hayling Island.
- 2.9 To the south of the site is a mix of residential properties (lining Church Road and within the defined Urban Area), a dense tree belt and agricultural land. Beyond this is 'The Oven Camp Site'.
- 2.10 To the west of the site is woodland and beyond this is Manor Road. Further to the west is agricultural land and a small number of residential properties.

- 2.11 The woodland belt to the south and west is protected by a group TPO.
- 2.12 There are bus stops located to the east of the site adjacent to Mill Rythe School and to the west adjacent The Oven Campsite. These offer frequent services to other areas of the Island (including the main District Centre) and further afield to the mainland. A pedestrian footpath runs along the north of the site linking it to Church Road.

Planning History

- 2.13 An online planning history search has not identified any relevant planning history for the application site.

3. The Proposed Development

- 3.1 This planning application seeks consent for a discount food store offering a quality range of affordable produce within a contemporary designed building with high sustainability credentials.

Lidl Retail Model

- 3.2 Lidl began trading in the UK in 1994 and has since grown to over 650 stores.
- 3.3 The Lidl retail model is centred on simplicity and maximum efficiency at every stage of the business, from supplier to customer, enabling the company to sell high quality own brand products at the lowest prices. Lidl is classified as a “deep discount” retailer and concentrates on selling a limited range of primarily own brand goods (around 90% of all products in store) at extremely competitive prices. As recognised by the Competition Commission, the Lidl model and retail offer is distinctive and differs from mainstream convenience retailers such as Tesco, Asda, Sainsbury’s and Morrisons.
- 3.4 A Lidl store typically stocks 1,800 lines of product. The range of goods sold is significantly smaller than that offered by other retailers, such as Morrisons, Tesco, Asda and Sainsbury’s who can retail over 35,000 lines.
- 3.5 Non-food items are limited to around 20% of floorspace in store. The non-food offer is mainly focused on household cleaning and health and beauty products. Lidl stores receive a twice weekly delivery of non-food ‘specials’. These items are provided on a ‘when it’s gone, it’s gone’ basis. Owing to the limited and constantly changing offer, the potential for impact upon other retailers is negligible.
- 3.6 Lidl stores also differ from other convenience retailers by not offering any of the following products or services:
- Butchers;
 - Fresh fish counter;
 - Delicatessen/cheese counter;
 - Hot food counter;
 - Pharmacy;
 - Dry-cleaning service;
 - Post Office services;
 - Café/restaurant; or
 - Cigarettes/tobacco.
- 3.7 As noted, Lidl differs from mainstream retailers by limiting product ranges and focussing on price and quality. The larger food retailers have been through a process of

diversification over the past decade. Many offer the above services as part of a 'one stop' destination for their customers. Lidl has always operated as a complementary retailer, with a significant proportion of customers also choosing to visit other retailers to fulfil their shopping needs.

Shorter Trading Hours

- 3.8 The standard opening hours for Lidl stores are also more limited than the main convenience retailers and smaller independent retailers. Generally Lidl stores open for a core period between 07:00 – 22:00 Monday to Saturday and Bank Holidays, and 6 hours between 10:00 – 16:00 on Sundays.
- 3.9 These standard opening hours do not compete to any significant degree with other retailers, in particular smaller convenience retailers, many of whom offer different products and services and stay open for longer periods, particularly on Sundays.

Store Format

- 3.10 Lidl has a distinct store format that is integral to the success of its business model. In late 2015, Lidl launched an innovative new store concept. The new concept Lidl store includes:
- state-of-the-art, glass front design to maximise natural daylight;
 - revamped wine cellar section;
 - customer toilets and baby changing facilities;
 - longer tills; and
 - self-checkouts to give added convenience.
- 3.11 The standard format has been purposefully designed in order to provide a safe and accessible store environment for mobility impaired customers, the elderly and those with small children.

Local Catchment

- 3.12 Lidl stores serve a relatively compact catchment area and are intended to provide a local shopping facility. In this case, the store is intended to serve the residents of Hayling Island. The locational strategy of Lidl is to serve an area that broadly equates to a 5 minute drive time. Due to its limited offer, people do not tend to travel long distances to shop at Lidl.

Employment Opportunities

- 3.13 The proposed store will employ up to 40 full and part-time staff. Lidl has a policy of employing local people from all backgrounds to work in their stores. This allows a short commute for staff.
- 3.14 Lidl offers many different career paths and opportunities, including managerial and administrative positions, store assistants and cashiers. Lidl also runs comprehensive management development and training programmes, enhancing the skills of staff and

maximising staff retention. As of March 2017, Lidl adopted the new Living Wage for all of its workers, making it the first supermarket in Britain to do so.

Sustainability

3.15 Lidl implements a variety of measures to minimise the environmental impact of its stores and contribute towards sustainability objectives, including:

- Lidl leads the sector in terms of recycling and waste-to-landfill reduction by recycling all paper/cardboard and plastic waste produced by its stores. This means over 90% of all waste produced in stores is recycled;
- Utilising a manual dock leveller for deliveries, reducing noise emissions and energy use;
- All stores are fitted with a 'Building Management System' incorporating movement sensors, Lux meters and thermostatic controls. This ensures that the back of house areas are only lit when not in use, that artificial lighting is only used when required and that the temperatures of the various areas within store are maintained at the correct levels. Energy efficient LED lighting is used and within the sales areas it is cut back to one third power before and after trading hours;
- Water consumption is carefully monitored and flow control devices and water meters are fitted in all stores; and
- Car park lighting is designed in accordance with Lidl's 'Dark Sky' policy, with light fittings carefully specified and cowling fitted in order to keep light spill beyond the site boundary to a minimum. Lux and timer controls are also fitted.

Design and Site Layout

3.16 The proposed store extends to 2,186 sq. m. gross internal area (GIA), providing 1,340 sq.m. of retail sales floorspace.

3.17 In order to maximise efficiency as a deep discounter, Lidl has a standardised approach to store design and site layout. Amending these can impact on the construction process, operation and usage which would undermine the viability of the deep discounter model.

3.18 The store is designed to maximise both usable sales space and customer parking. The sales area is rectangular with an entrance at one end and servicing at the other. A storage warehouse is located to the rear of the sales area and is serviced by a HGV accessible delivery bay. Welfare facilities for staff are provided.

3.19 Large areas of glazing are proposed on the eastern elevation. A small section of the glazing wraps around onto the northern elevation. The northern, southern and western elevations mainly comprise white painted render with a low level grey plinth and metallic silver Alucobond rainscreen cladding.

Boundary Treatment and Landscaping

3.20 The proposal will retain all existing trees and as much of the existing hedgerow as possible. Additional planting will supplement that which is retained.

Access and Parking

- 3.21 A single vehicular access to Manor Road will be created which is designed to account for customer, staff and delivery vehicles.
- 3.22 A pedestrian access is also proposed from Manor Road.
- 3.23 The store will provide 126 customer car parking spaces, 10 of which are for disabled users and 8 for parent and child.
- 3.24 Cycle parking will be provided in the form of Sheffield Stands, a total of 11 short-stay and 8 long-stay spaces are provided.
- 3.25 The site is accessible via existing bus routes.

Servicing

- 3.26 Goods deliveries will be made via the delivery bay to the west of the store. The delivery bay will be accessed via a HGV grade vehicle ramp and delivery vehicles will turn within the site and leave in a forward gear. The delivery bay will be shielded by an acoustic fence to minimise potential disturbance.
- 3.27 Lidl is mindful of the need to minimise any disturbance to neighbouring residents. To assist in achieving this, each store usually has only two or three dedicated deliveries per day. This provides all the necessary products for the store, including frozen and chilled goods. All waste is removed by these delivery vehicles as part of their return journey to the distribution centre.
- 3.28 During deliveries, it is company policy that vehicle engines are switched off to reduce noise and disturbance. New stores also feature graded ramps in delivery bays and manual dock levellers, negating the need for noisy scissor or tail lifts. The total unloading time for deliveries is approximately one hour.

4. Planning Policy Framework

- 4.1 This Section provides an overview of the planning policy framework relevant to the determination of the planning application. A more detailed review of the Borough's planning policies can be found within Appendix 1.

National Planning Policy Framework

- 4.2 The National Planning Policy Framework (NPPF) was published on 27 March 2012 and forms the planning framework for England.
- 4.3 A 'Presumption in Favour of Sustainable Development' is central to the NPPF. Paragraph 14 states that:

"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking."

- 4.4 For decision-taking this means approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted.

Havant Borough Council Development Plan

- 4.5 The Development Plan for Havant Borough Council comprises the Local Plan (Core Strategy (2011) and Allocations (2014)) and the Hampshire Minerals and Waste Plan (2013).
- 4.6 The adopted Proposals Map indicates that the site is:
- within an area of flood risk (both Zone 2 and 3);
 - designated as an uncertain site for Brent Geese and Waders; and
 - outside of but adjacent to the urban area (CS17-AL2).

Havant Borough Local Plan (Core Strategy) (2011-2026)

- 4.7 The Core Strategy was adopted in March 2011, covering a plan period to 2026.
- 4.8 With reference to Hayling Island the plan notes that:
- 25% of the Island's population is aged over 65;
 - there are limited employment opportunities with many people commuting to the mainland;
 - tourism is important; and
 - access on and off the island is challenging.
- 4.9 The spatial strategy seeks to concentrate development within the defined urban areas.
- 4.10 Support is given to developments which provide employment opportunities and raise skill levels and improve access to goods and services.
- 4.11 The main retail centre on Hayling Island is Mengham/Gable Head and it is noted that many local residents have limited opportunities to travel off the island to shop. A centres first approach is applied to retail development.

The Havant Borough Local Plan (Allocations) (2014)

- 4.12 The Local Plan Allocations document was adopted in July 2014.
- 4.13 Land outside the defined urban area on Hayling Island is 'non-urban' rather than being classed as an 'undeveloped gap'. Supporting text notes that proposals for development in the non-urban areas need to be considered on the basis of the local plan policies and the NPPF policies on rural areas.
- 4.14 The plan recognises that many residents on Hayling Island have limited opportunities to travel off the island to shop.
- 4.15 Planning permission for development on uncertain sites for Brent Geese and/or waders outside of the statutory designated areas will be granted, where appropriate surveys are undertaken and it is determined that the site has no importance.

Emerging Local Plan 2036

- 4.16 The Council published a Local Development Scheme in January 2017 setting out the timetable for the emerging Local Plan which will replace both the Core Strategy and Allocations documents.
- 4.17 The LDS notes that there are a number of challenges facing Hayling Island including its single permanent access to the mainland. A scrutiny panel has been established to fully explore the infrastructure issues facing the island. During pre-application discussions access to services and facilities (including retail) was identified as an issue to be addressed to ensure that the Island becomes more self-sufficient.

Town Centres, Retail and Leisure Study (2009)

- 4.18 Nathaniel Lichfield and Partners produced a Town Centres, Retail and Leisure Study for Havant Borough Council which was published in March 2009.
- 4.19 Tesco (Havant) is the main food shop destination for 38% of Hayling Island residents.
- 4.20 Mengham/Gable Head District Centre was developed in the 1960s and 70s to meet the needs of residents and to accommodate tourist trade in the peak holiday season. The reliance some Islanders have on the centre due to limited opportunities to travel to the mainland is noted. The study identifies that there are limited opportunities to accommodate significant retail development in the centre due to physical constraints imposed by the close proximity of surrounding residential properties.

5. Planning Considerations

- 5.1 This section addresses the key planning considerations raised by the proposed development and begins by reviewing the principle of developing a food store at the application site.

Principle of Development

- 5.2 This planning application seeks consent for a discount food store on a site located outside but adjacent to the defined urban area of Hayling Island. In strict planning policy terms the site is considered to be 'non-urban' and a location where development is restricted to that consistent with policies for the countryside, as set out within national policy (Policy CS17). The Development Plan is clear that land outside of the urban area of Hayling Island should be treated as non-urban as opposed to a 'gap' between settlements. Supporting text for Policy AL2 goes on to note that development of non-urban land should be considered in relation to development plan policies and the NPPF policies on rural areas.
- 5.3 The Local Development Scheme notes that there are a number of infrastructure challenges facing Hayling Island and that a scrutiny panel has been established to fully explore this further. These challenges have been discussed at a pre-application meeting (see response in Appendix 2) and planning officers provided an overview of the preparation of an Infrastructure Delivery Plan which will support the emerging Local Plan. This will consider various infrastructure requirements including measures to make Hayling Island more self-sufficient through means such as better access to service and facilities (including retail). Support was given to a food store on Hayling Island for the infrastructure benefits which would be realised to strengthen self-sufficiency and sustainability.
- 5.4 Although the application site is categorised as 'non-urban', when its context is considered in more detail it is clear that this is not an isolated rural site. The site adjoins the defined urban area with residential properties of Church Road to its south and east. The site is well contained by woodland and Manor Road. The site relates more to the urban area than that of the open countryside of Hayling Island which extends northwards, beyond Manor Road. Development of the site should be viewed as an extension to the existing urban area rather than development in an isolated location. The sequential site assessment has not identified any suitable and available sequentially preferable sites within or closer to the main retail centre. This reflects the findings of the authority's Retail Study (2009) which notes that there are physical constraints to the delivery of significant retail development within the main district centre of Hayling Island.
- 5.5 The proposed development offers a number of significant benefits to Hayling Island which will support ambitions to make it more self-sufficient and sustainable:

Retail Offer

- 5.6 The proposed development will enhance the retail offer of Hayling Island by providing a discount food store, a format only found on the mainland. As explained (see also the submitted Retail Assessment), due to the discount format and operation of the proposed store, it will not compete with existing retailers on the Island and users of the store are likely to undertake linked trips to other local retailers to complete their required shopping.
- 5.7 The Council's evidence base notes that a large proportion of residents travel off the Island to undertake their main food shop. But, as recognised within the Development Plan, some residents have limited opportunities to travel off the Island and are reliant on the facilities and services available. To get a better understanding of where residents undertake their main food shop Lidl conducted their own survey of local residents. The results show that of the 2,299 respondents, 81% undertake their main food shop on the mainland, 14% rely on retailers on the Island and the remaining 5% use the internet. By developing a discount food store on the application site Hayling Island will become more self-sufficient reducing the need for residents to travel to the mainland and providing those unable to travel off the Island access to a new retail format. Expenditure will be retained and the important tourism economy will be supported through the provision of a new facility which can be utilised by visitors.
- 5.8 In summary, the application site offers a rare opportunity to bring forward a discount food store which will enhance the retail offer of Hayling Island for residents and tourists, reducing reliance on mainland stores and retaining expenditure, ultimately allowing the Island to be more self-sufficient.

Reducing the need to travel

- 5.9 The proposed foodstore will reduce the need for residents to travel off of the Island to undertake their food shop. The latest Retail Study (2009) noted that 38% of residents on Hayling Island undertake their main food shop at the Tesco supermarket in Havant. The Transport Assessment submitted with this application reflects upon the large number of people who travel off the Island to undertake their food shopping. Reducing the number of people who need to travel to the mainland will be beneficial for Island's roads, particularly in reducing pressure on the regularly congested bridge to the mainland and Langstone interchange. In turn this will have associated benefits such as reducing emissions.
- 5.10 Policy CS20 encourages development which improves access to goods, services and employment. A foodstore in this location will assist in achieving the aspirations of this policy. This is particularly the case where the site is accessible by foot, bicycle and bus by the majority of the Island's residents.
- 5.11 More detailed transport matters are considered in further detail below.

Creating Local Employment Opportunities

- 5.12 Policy CS1 is supportive of development which enhances the life chances of young adults, especially via access to employment. Furthermore, Policy CS3 supports proposals which raise skill levels.

- 5.13 As a company Lidl employs over 19,000 people and is committed to the development of each and every one of its employees. The company operates various training programmes to develop skills and enable career progression. It became the first British supermarket to adopt the Living Wage, further demonstrating the importance it places on supporting and retaining staff.
- 5.14 Once constructed the proposed store will make a positive contribution to local job creation on Hayling Island through the employment of approximately 40 full and part time staff. Alongside the creation of in store roles, a number of jobs will be created in servicing the store (for example delivery drivers) and within its supply chain. Moreover, jobs will be created during the construction phase.
- 5.15 The anticipated job creation should be viewed as a significant positive impact particularly where employment opportunities on Hayling Island are recognised as being limited and often seasonal in nature.

Summary of Principle

- 5.16 The site is classed as 'non-urban' within the development plan. However, it has been demonstrated that it is not an isolated rural site and that it relates well to the urban area to which it adjoins. A sequential site assessment has not identified any preferable sites. Of particular importance to the consideration of principle are the infrastructure challenges faced by the Island and the ambition to make it more self-sufficient, including by way of enhanced services and facilities. In this regard the principle of development was supported by the Local Planning Authority during pre-application discussions.
- 5.17 We have identified a number of positive benefits which can be realised through the delivery of the Lidl food store including:
- Enhanced retail offer for residents and tourists;
 - Retention of spending on the Island;
 - Reducing the need to travel by locating a discount food store in an accessible location; and
 - Creating quality employment opportunities for local people.
- 5.18 When these benefits are combined with the opportunity to create a more self-sufficient and sustainable Island, the positive impact of the development outweighs the loss of a non-urban site. The planning balance falls firmly in favour of the principle of development. Therefore, the planning application should be viewed positively subject to relevant material considerations which are outlined below.

Material Considerations

Retail Impact

5.19 The location of the application site is classed as out-of-centre in retail terms and in accordance with the development plan and national policy, a retail impact assessment and sequential site assessment have been undertaken. The full results of this exercise can be found within the submitted Retail Assessment and can be summarised briefly as:

- The health checks undertaken conclude that the main retail centre on Hayling Island and surrounding local centres are performing well;
- The sequential site assessment has established that there are no sequentially preferable sites which are considered to be suitable or available. The application site is considered to be the most sequentially preferable site situated close to the Hayling Island community; and
- The impact assessment has demonstrated that the anticipated trading effects of the proposed store are not considered to be at a level that will lead to a significant adverse impact upon the vitality and viability of the Island's district and local centres. Moreover, the store will help to retain spending on the island which is currently lost to the mainland.

5.20 In accordance with the NPPF and Policies CS4 and AL3 it has been demonstrated that the proposed discount food store will not negatively impact upon the vitality or viability of existing retail centres.

Flood Risk

5.21 A Flood Risk Assessment and SuDS Report has been prepared by Hemsley Orrell Partnership. To inform the assessment and ensure that it is robust, pre-application discussions have been held with the Environment Agency.

5.22 The report confirms that the site is located across Flood Zones 1, 2 and 3 and that it is at high risk from both fluvial and ground water flooding. The main method of mitigation will be through raising finished floor levels to 4.6m AOD, 530mm higher than the design flood level agreed with the Environment Agency. External hardstanding will be at 4.3m AOD so that it too is above the design flood level. Flood Zone compensation is included within the west of the site so that flood risk to neighbouring and downstream properties is not adversely affected by the development.

5.23 The assessment considers that the sequential test has been passed and because it is a 'Less Vulnerable Development' it is compliant with Flood Zone 3a and an Exception Test is not required.

5.24 Surface water runoff will be managed through the use of Sustainable Urban Drainage Systems (SuDS) to limit peak flow to 5l/s. Flows above this rate will be managed via on-site attenuation in the permeable sub-base which will release into the adjoining watercourse. Surface water drainage has been designed to accommodate a 1 in 100 year storm event with a 20% allowance for climate change. SuDS will not be adopted but maintained by the owner or managing company of the development site

- 5.25 Measures will be put in place to enable water quality treatment including a permeable sub-base material which will provide extensive filtration and bypass separator for hydrocarbon removal.
- 5.26 The Flood Risk Assessment concludes that through appropriate mitigation the risk of flooding can be reduced to acceptable levels. Increased risk to surrounding properties will be avoided via the use of appropriate drainage and Flood Zone compensation. With regards to flood risk and drainage, the proposed development conforms to the NPPF and Policy CS15.

Transport

- 5.27 In accordance with Policy DM12, RPS have completed a Transport Assessment of the proposed store and the findings of this are summarised below.

Traffic and Access

- 5.28 Approximately 80% of residents currently travel to the mainland to undertake their food shopping. The evening peak trips for the proposed store are calculated at 135 and the Saturday peak at 180, however, only 16% of these will be new trips generated by the development, the majority (69%) will be transferred trips. These transferred trips will come from trips currently being made to the mainland and therefore it is anticipated that as a result of the development trip numbers on the A3023 will decline. The Transport Assessment calculates this reduction to be 93 vehicle trips during the weekday evening and 124 vehicle trips during peak hour on Saturdays.
- 5.29 Assessments indicate that there are no issues with capacity or queuing at the roundabout to the east and that junctions operate well within capacity. Similar findings are made for the proposed access junction with Manor Road.
- 5.30 The site access has been designed to ensure that it is suitable for customers, staff and delivery vehicles so that all can enter and leave in a forward gear.
- 5.31 The proposed development will have a positive impact upon the existing highway network by reducing trips to food stores on the mainland.

Pedestrian, Cycle and Public Transport

- 5.32 The majority of the most populated area of Hayling Island is within two miles of the site, a distance which is considered to be normal for walking by the DMRB. Therefore, the majority of residents on Hayling Island could reach the store on foot.
- 5.33 The Transport Assessment notes that the topography of the island is flat which does not act as an impediment to cycling and the site is close to suggested and established cycle routes.
- 5.34 As noted, the site benefits from being a relatively short distance from existing bus stops which connect the site to other areas of the Island and the mainland.
- 5.35 The site is considered to be in an accessible location where walking, cycling and public transport are feasible options.

Parking

- 5.36 The Transport Assessment undertakes a review of the proposed car park capacity. It notes that Hampshire County Council seek 1 space per 14 sqm for food retail schemes but that it is recognised that demand should be assessed on a case-by-case basis.
- 5.37 The assessment calculates a peak car park accumulation of 38 cars which is well within the 126 car park spaces proposed. The additional spaces will allow the store to cope with peaks in demand, for example during the Christmas period.
- 5.38 Appropriate short and long stay cycle parking provision has been made.
- 5.39 It is considered that appropriate provision has been made for car parking.

Transport Conclusion

- 5.40 The Transport Assessment concludes that the majority of trips to the proposed store are already present on the highway network, with many of these journeying to the mainland to undertake food shopping. Therefore, the proposals will reduce journey times for local residents and reduce the number of vehicles passing through the busy A27/Landstone Road interchange. The proposed store is in an accessible location where sustainable modes of transport offer a viable alternative to the car.
- 5.41 The NPPF is clear that proposed developments should only be refused on transport grounds where the residual cumulative impact of development is severe. It has been shown that the proposed store will have a positive impact on the highways network and support the aims of policies DM11 and CS20, including improving access to goods, services and employment.

Ecology and Trees

- 5.42 A Preliminary Ecological Appraisal has been completed by The Ecology Partnership.
- 5.43 The site is designated as being 'uncertain' in terms of its suitability for Brent Geese and waders species. An assessment of its potential suitability has been undertaken in accordance with policy DM23. The results demonstrate that the site is not suitable for supporting these species. Reasons for this include the limited vegetation available for birds to feed on, the unsettling conditions the grazing use creates (including access by humans), surrounding woodland which creates a barrier to bird flight paths, a lack of wetland and disturbance from Manor Road. No evidence has been identified to indicate that the site is used by these species.
- 5.44 It is considered that the impact on Natura 2000 and Ramsar sites will be de minimis.
- 5.45 The site is of a low ecological value but has potential to provide foraging habitat. It is recommended that the northern hedgerow is retained along with boundary features. This advice has been followed within the proposed design.
- 5.46 A Tree Survey and Arboricultural Impact Assessment (AIA) have been undertaken by RPS. All trees are to be retained and additional trees planted, as detailed within the submitted plans. The AIA details measures which will be taken to protect trees during construction.

- 5.47 The proposed development supports the aims of policies CS11 and DM8.

Design

- 5.48 Lidl takes a standardised approach to the format of their stores and this forms an essential element of their highly efficient operation which enables them to trade as a discount retailer. However, in approaching the application site the orientation and siting of the store seeks to minimise impact on the neighbouring properties, whilst retaining all existing trees. Additional tree planting and landscaping forms part of the proposed development as detailed within the submitted Soft Landscape Proposals plan.
- 5.49 The application site is currently agricultural land and the development will change its character. Retention of existing boundary trees and woodland, as recommended in pre-application advice, will minimise the visual impact of the store when viewed from the east, south and west. The more open boundary to the north will give the store a presence on Manor Road. The proposed store adopts the latest store format and contemporary design with large areas of glazing, providing an attractive frontage to the store when viewed from this location. The existing hedgerow will be retained as far as possible.
- 5.50 As explained, the application site relates more to the urban area of Hayling than that of the more rural, open landscape to the north (Central Hayling Plain Character Area). Along with the containment provided by the site's existing boundaries, this will minimise the impact of the development on wider landscape character.

Sustainability

- 5.51 The Design and Access Statement details sustainable measures which will be incorporated into the design of the building, including:
- Providing 10% of the stores energy requirements from renewable or low carbon energy sources;
 - The use of highly efficient LED lighting, incorporates a mix of movement detectors and lux sensors;
 - The installation of a Building Management System to control mechanical plant and monitor the electrical and water use; and
 - Achieve a decrease of between 8% and 20% in water use compared to the national average at 2005.
- 5.52 Alongside the sustainability measures adopted in the design, the development itself will have a beneficial impact on the wider sustainability of Hayling Island by making it more self-sufficient and reduce the number of transport movements to the mainland for food shopping.
- 5.53 The store will be designed to meet BREEAM 'Very Good', the level required by Policy CS14.

Amenity

- 5.54 The key amenity consideration is the noise impact of the proposed development upon nearby properties, principally generated from deliveries, car movements and external plant.
- 5.55 A Noise Impact Assessment (NIA) has been produced by Acoustic Consultants Ltd and is submitted in support of the application. Monitoring was undertaken around the site to establish existing background noise levels.
- 5.56 The report identifies the residential properties off Manor Road, to the north west of the proposed plant/delivery bay, as being the most sensitive location. Other residential properties are shielded from the plant/delivery bay via the proposed store or are at a further distance.

Plant

- 5.57 The NIA details the proposed plant (Dry Coolers, Heat Pumps and VRF Plant) and its location and layout. The plant will be located at ground floor within a compound adjacent to the delivery bay to the west of the store.
- 5.58 The impact on the most sensitive receivers has been modelled and has been assessed on a worst case basis, this being night-time plant operation. It is concluded that the plant rating noise level will result in a British Standard 4142:2014 assessment 'difference' - 1dB at the nearest noise-sensitive receiver during the night. The proposed plant will have a low impact on noise-sensitive receivers. It is considered that plant noise will fall below the Lowest Observed Adverse Effect Level (LOAEL) and therefore does not conflict with the aims of the NPPF.

Car Parking

- 5.59 Noise levels in the car park will be no higher than the current levels of road traffic on Manor Road and Church Road.

Deliveries

- 5.60 The delivery bay is located to the west of the store and delivery vehicles will enter the site via Manor Road. The store will usually receive only two to three dedicated deliveries per day, which will minimise disturbance to residents. Engines will be turned off during the unloading of goods which will take approximately one hour.
- 5.61 The NIA bases its assessment on known delivery noise recorded at various Lidl stores over a number of years. For the proposed store mitigation measures are required for delivery noise when background noise is at its lowest (11pm to 7am) and these have been designed into the scheme. This includes a 3m acoustic barrier to the west of the delivery bay which is specified within the NIA.
- 5.62 With regards to the unloading of deliveries and taking into consideration the context of the site, the report concludes that the noise impact of unloading will fall below the Lowest Observed Adverse Effect Level (LOAEL).
- 5.63 The arrival and departure of delivery vehicles at the site is considered to be acceptable 24 hours a day with the noise impact falling below the No Observed Adverse Effect

Level (NOAEL). Therefore, delivery vehicles will not have any impact on sensitive receptors.

Amenity Impact Summary

- 5.64 In assessing the proposed plant and typical delivery operation of a Lidl store (with mitigation) the NIA concludes that the noise impact of the plant and deliveries on the noise-sensitive receivers around the site to fall below the Lowest Observed Adverse Effect Level (LOAEL). The plant and delivery noise is considered to be acceptable and in line with the NPPF and Policy DM10.

6. The Planning Balance

- 6.1 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. This requires the planning system to perform a number of roles:
- An economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
 - A social role – creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being;
 - An environmental role – contributing to protecting and enhancing our natural, built and historic environment. This includes minimising waste and pollution.
- 6.2 In decision making the NPPF states that proposals which conflict with an up-to-date development plan should be refused unless other material considerations indicate otherwise.
- 6.3 The application site is located in the non-urban area of Hayling Island and is contrary to the development plan which seeks to concentrate development within the urban area. However, enhancing infrastructure to make the Island more self-sufficient and sustainable is a key challenge for the Council and the emerging Local Plan. The infrastructure requirements are being explored by Havant Borough Council but one challenge recognised is improving access to services and facilities, including retail. Due to a lack of large format food retailers reliance is placed on the mainland for food shopping with circa 80% of residents travelling off the Island. This creates a number of issues which undermine the sustainability of the Island including the impact of increased journeys and associated congestion and emissions.
- 6.4 Lidl has undertaken an extensive search for a suitable and available location for a new discount food store. As demonstrated in the sequential site assessment, there are no other suitable or available sites closer to existing retail centres. The application site relates well to the urban area and is within an accessible location. It is therefore not an isolated rural site and should not be treated as such.
- 6.5 In determining the planning application significant weight should be placed upon the need to improve infrastructure to enable the Island to be more self-sufficient and sustainable. Weight should also be placed upon the benefits which will be created by the proposed food store which are reflective of the NPPF's definition of sustainable development:
- Economic – creating employment opportunities for local residents, retaining expenditure to the benefit of the Island and supporting the tourism industry;

- Social – enhancing the retail offer for residents and tourists and reducing the need to travel to the mainland; and
- Environmental – reducing traffic and associated emissions, delivering an energy efficient building, retaining trees and managing flood risk.

6.6 The loss of non-urban agricultural land needs to be weighed against the benefits and infrastructure enhancement the proposed food store will bring, particularly with regards to the sustainability and self-sufficiency of Hayling Island. When these elements are considered the planning balance falls firmly in favour of the proposed development. Analysis of material considerations demonstrate that the proposals are acceptable in all regards and it is respectfully requested that planning permission is granted.

Appendix 1: Planning Policy Review

National Planning Policy Framework

The National Planning Policy Framework (NPPF) was published on 27 March 2012 and forms the planning framework for England.

A 'Presumption in Favour of Sustainable Development' is central to the NPPF. **Paragraph 14** of the NPPF states that:

“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.”

Paragraph 14 of the NPPF requires that for decision-taking this means:

- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted.

At **Paragraph 17**, twelve “planning principles” are set out that are intended to underpin both plan making and decision taking. In this case, the following (paraphrased) are of most relevance:

- Planning should proactively drive and support sustainable development to deliver objectively identified needs for new development, taking account of market signals and business community requirements;
- A high quality of design should be secured;
- Account should be taken of the different character and roles of different areas;
- Development should conserve and enhance the natural environment;
- The use of Previously Developed Land should be encouraged, provided that it is not of high environmental value; and
- Development should be located sustainably from a transport perspective.

National policy applying to proposals involving retail development is set out at **Paragraphs 23-27** of the NPPF.

Paragraph 24 of the NPPF confirms that Local Authorities should apply a 'sequential test' to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. Such proposals are required to be located in town centres, then edge-of-centre locations, and only if suitable sites are not available should out-of-centre sites be considered. The NPPF advises that in considering edge and out-of-centre sites, preference should be given to sites that are accessible and well connected to the town centre.

Town centres are defined in the NPPF as city, town, district and local centres, but exclude small parades of shops of purely neighbourhood significance. The relevant area is to be defined on the Local Authority proposals map, including the Primary Shopping Area (PSA) and areas predominantly occupied by main town centre uses within or adjacent to the PSA.

Paragraph 26 of the NPPF confirms that when assessing retail proposals outside town centres, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold. If there is no threshold, as is the case with the adopted Core Strategy, the NPPF confirms that the default threshold is 2,500 sq. m.

Where impact assessments are required, policy relating to retail impact has been simplified in the NPPF to reference two criteria only:

- The impact on existing, committed or planned public and private investment in a centre, or centres, in the catchment area; and
- The impact on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to 5 years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.

The NPPF promotes sustainable transport and decisions should be taken based on: whether the opportunities for sustainable transport modes have been taken up; whether safe and sustainable access can be achieved for all people; and whether improvements can be undertaken that cost effectively limit the significant impacts of development. Travel Plans are recognised as performing a key role in exploiting the use of sustainable transport modes.

Paragraph 32 is clear that development should only be refused or prevented on transport grounds where the residual impacts of development are severe.

The NPPF emphasises that good design is a key aspect of sustainable development, is indivisible from good planning and should contribute positively to making places better for people.

Paragraph 103 seeks to ensure flood risk is not increased elsewhere by a development proposal. Local Planning Authorities should only consider development appropriate in areas at risk of flooding where the proposal is informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test. This should demonstrate that within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location and the proposed development is appropriately flood resilient and resistant, and that any residual risk can be safely managed, and it gives priority to the use of sustainable drainage systems.

Paragraph 118 calls for Local Planning Authorities to conserve and enhance biodiversity. The policy states that planning permission should be refused if a proposed development would result in significant harm to the natural environment which cannot be avoided (through the use of an alternative site with less harmful impacts), mitigated or compensated for (as a last resort).

Havant Borough Council Development Plan

The Havant Borough Council Development Plan comprises the Local Plan (Core Strategy (2011) and Allocations (2014) documents) and the Hampshire Minerals and Waste Plan (2013).

The adopted Proposals Map indicates that the site:

- is within an area of flood risk (both Zone 2 and 3);
- is designated as an uncertain site for Brent Geese and Waders (Site Code 47); and
- adjoins the 'Concentration and Distribution of Development within the Urban Areas' (CS17-AL2) and 'Regeneration of the Borough' (CS6).

Havant Borough Local Plan (Core Strategy) (2011-2026)

The Core Strategy was adopted in March 2011, covering a plan period to 2026. In contextualising the Borough the plan notes:

- unemployment levels have historically been higher than the rest of Hampshire;
- there are high levels of commuting in and out of the borough with lower skilled residents commuting out and higher skilled people commuting in; and
- with specific reference to Hayling Island it notes that:
 - 25% of the Island's population is aged over 65;
 - there are limited employment opportunities with many people commuting to the mainland;
 - tourism is important; and
 - access on and off the island is challenging.

Policy CS1 (Health and Wellbeing) supports development which improves the education and life chances for young adults especially by facilitating access into employment; and those which address barriers to employment for economically inactive people.

Policy CS3 (Skills and Employability) states that planning permission will be granted for development proposals that raise skill levels and increase employability. Supporting text notes that raising the skills levels of the existing and potential workforce of the borough is a key economic driver for promoting Havant Borough's economy. Furthermore, support is given to proposals that raise the skill levels and employability of young people and help them into work, education or training.

Policy CS4 (Town, District and Local Centres) identifies the boroughs main town centres as being Havant and Waterlooville. Mengham/Gable Head is identified as a district centre and as the principle shopping area on the island which also accommodates tourist trade in the peak season. Furthermore, it is noted that many local residents have limited opportunities to travel off the island to shop. Both Rails Lane and West Town are identified as local centres. Supporting text notes that proposals for retail floorspace outside designated centres will need to demonstrate in a robust and transparent manner the sequential approach to site selection, an impact assessment and all other relevant tests set out in current government policies.

Policy CS11 (Protecting and Enhancing the Special Environment and Heritage of Havant Borough) seeks to protect and where possible enhance statutory and non-statutory designated landscape, habitats and features of biological, hydrological or geological interest. Protection is given to wildlife habitats and wildlife corridors to prevent the fragmentation of existing habitats and to allow species (including Brent Geese) to respond to the impacts of climate change by making provision for habitat adaption.

Policy CS8 (Community Safety) supports developments that engrain community safety into the development process; provide well-lit footpaths, cycleways and roads (provided it does not adversely affect designated habitats or the landscape); and maximises opportunities for natural surveillance through good design.

Policy CS14 (Efficient Use of Resources) requires non-residential development over 500sqm to meet BREEAM 'very good', unless proven to be financially or technically unviable.

Policy CS15 (Flood and Coastal Erosion Risk) states that development in areas at risk of flooding will only be permitted where:

- "1. It meets the sequential and exception test (where required) in relation to PPS25.*
- 2. The site is located in a low hazard area as defined in the Strategic Flood Risk Assessment.*
- 3. A site-specific flood risk assessment demonstrates that the development will be safe, including the access, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.*
- 4. The scheme incorporates flood protection, flood resilience and resistance measures appropriate to the character and biodiversity of the area and the specific requirements of the site.*
- 5. Appropriate flood warning and evacuation plans are in place.*
- 6. New site drainage systems are designed taking account of events which exceed the normal design standard."*

All new development is required to ensure that there is no net increase in surface water runoff, with a priority given to SuDS.

Policy CS16 (High Quality Design) states planning permission will be granted for development that is designed to a high standard which helps to create places where people want to live, work and relax.

The policy further notes that development proposals should respond to and respect local context, create a high quality public realm, be inclusive and accessible for all users and mitigate any negative environmental impacts through sustainable design and construction methods, resource efficiencies, particularly water and the provision of facilities for waste recycling.

Policy CS17 (Concentration and Distribution of Development within the Urban Areas) notes that development in the non-urban areas will only be permitted where it is consistent with the policies for the countryside set out in national policy.

Policy CS20 (Transport and Access Strategy) is supportive of development that does not increase congestion and promotes the better use of existing transport networks. Development should also improve accessibility to goods, services and employment. Transport management measures should be implemented to ensure safe and efficient operation of the strategic and local road network. Supporting text notes that Hayling Island is home to more than 17,000 people but has a limited range of facilities, resulting in congestion and pollution along the only road onto and off the island.

Policy DM8 (Conservation, Protection and Enhancement of Existing Natural Features) seeks to protect and enhance local habitats and landscape distinctiveness.

Policy DM10 (Pollution) addresses development which would give rise to pollution of water, air or soil thorough means including noise, smell, dust, light and vibration. It sets out criteria which are to be met. This includes protecting the health and safety of users and neighbours; and keeping external lighting to a minimum.

Policy DM11 (Planning for More Sustainable Transport) seeks to ensure that every opportunity is taken to increase integration of sustainable travel modes and availability of non-motorised modes by appropriate measures.

Policy DM12 (Mitigating the Impacts of Travel) requires new developments to mitigate their travel impact, including the environmental impacts of travel (such as noise, air and visual pollution) and impacts on amenity, health and climate change. A transport assessment and travel plan should be submitted alongside any planning application on proposals for major development or where a proposal is likely to have significant transport implications.

Policy DM14 (Car and Cycle Parking on Development (Excluding Residential)) requires parking for cars, motor cycles and cycles in accordance with the relevant standards.

The Havant Borough Local Plan (Allocations) (2014)

The Local Plan Allocations document was adopted in July 2014.

Policy AL1 (Presumption in Favour of Sustainable Development) is reflective of the NPPF and notes that the Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Policy AL2 (Urban Area Boundaries and Undeveloped Gaps between Settlements)

confirms that the Borough's undeveloped gaps are between the urban boundaries of Waterlooville, Leigh Park, Havant, Emsworth; together with the undeveloped gaps between them and neighbouring boundaries with Portsmouth, Winchester, East Hampshire and Chichester. Land outside the defined urban area on Hayling Island is 'non-urban' rather than undeveloped gap. Supporting text notes that proposals for development in the nonurban areas need to be considered on the basis of the local plan policies and also the NPPF policies on rural areas.

AL3 (Town, District and Local Centres) establishes a centres first approach to retail development to support vitality and viability.

Section 6 addresses designations for Hayling Island and it again recognises that many residents have limited opportunities to travel off the Island to shop.

Policy DM23 (Sites for Brent Geese and Waders) permits planning permission for development on uncertain sites for Brent Geese and/or waders outside of the statutory designated areas, where appropriate surveys are undertaken and it is determined that the site has no importance.

Parking Supplementary Planning Document

The Parking SPD was adopted in July 2016 and sets the following requirements for retail (A1 food) proposals:

- 1 car parking space per 14sqm of floor space;
- 1 long stay cycle space per 6 staff or 1 per 300 sqm GEA whichever is greater; and
- 1 short stay cycle space per 200 sqm GEA.

Disabled parking is to equate 5% of the total provision.

Travel Plans are required for retail schemes in excess of 1,000 sqm.

Emerging Local Plan 2036

The Council published a Local Development Scheme in January 2017 setting out the timetable for the emerging Local Plan which will replace both the Core Strategy and Allocations documents.

The LDS notes that there are a number of challenges facing Hayling Island including its single permanent access to the mainland. A scrutiny panel has been established to fully explore the infrastructure issues facing the island.

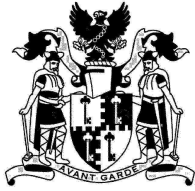
Town Centres, Retail and Leisure Study (2009)

Nathaniel Lichfield and Partners produced a Town Centres, Retail and Leisure Study for Havant Borough Council which was published in March 2009.

The retail study states that on Hayling Island Tesco, Havant received the highest number of responses with 38% of residents citing this destination as the location of their main food shop. 25% also cited Havant Town Centre as being the main destination for their non-food shopping.

Mengham/Gable Head District Centre was developed in the 1960s and 70s to meet the needs of residents and to accommodate tourist trade in the peak holiday season. The reliance some Islanders have on the centre due to limited opportunities to travel to the mainland is noted. The study identifies that there are limited opportunities to accommodate significant retail development in the centre due to physical constraints imposed by the close proximity of surrounding residential properties.

Appendix 2: Havant Borough Council Pre-application Response



Havant
BOROUGH COUNCIL

Public Service Plaza
Civic Centre Road
Havant
Hampshire PO9 2AX

T 023 9247 4174
F 023 9248 0263
www.havant.gov.uk

Mr C Ambler
Southampton Property Office
Lidl UK gmbH
Foxes Park
Brownhill Way
Nursling, Southampton
SO16 0AW

Our Ref: GEN/17/00276
Direct Line: (023) 02392 446263
Ask For: Mr L Oliver
Email: planning.development@havant.gov.uk

18 May 2017

Site Location: Proposed food store Lidl, Hayling Island
Re: Pre-application for Lidl application on Hayling Island

Dear Sir,

I am writing to you further to your enquiry received on the 10 March 2017 regarding the above address.

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) Infrastructure, access and Highway Implications
- (iii) Impact on the character and appearance of the area
- (iv) Impact on the amenities of neighbouring properties
- (vi) Flooding and Drainage
- (vii) The Effect of Development on Ecology
- (viii) Community Infrastructure Levy

(i) Principle of development

The site is located on the junction of Manor Road and Church Road, in the central part of Hayling Island. It comprises a green field and is "Non- Urban" as defined on the HBLP policies map policy (AL2). The site is also designated as having Uncertain Importance for Brent Geese and Waders and is in Flood Zones 2 and 3.

Para 2.10 of the HBLP (Allocations) states that proposals for development in the non-urban areas need to be considered on the basis of the local plan policies and also the NPPF policies on rural areas.

Policy CS17 seeks to concentrate development in the urban areas. It states that development in the non-urban areas will only be permitted if it is consistent with the policies for the countryside set out in national policy.

The NPPF states that local plans should:

1. Allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre and
2. Set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres

The supporting text to Policy AL3 of the HBLP (Allocations) states that main town centre uses should be located in town, district and local centres. Information submitted in the Retail Paper as part of this pre-application enquiry considers other sites available within the designated centres on Hayling Island, but concludes that none are suitable. Although the site is located directly adjacent to the urban area, it is some distance from the nearest District Centre at Mengham/Gable Head, making it an out of centre proposal. As such, the sequential approach, as promoted by the NPPF, applies.

Although a centre location would be preferable, the Retail Paper considers other sites within the District Centre but discounts these for reasons including availability and size. This information justifies a sequential approach to the proposed location of the store outside the urban area.

(ii) Infrastructure, access and Highway Implications

The infrastructure concerns of Hayling residents are well documented, particularly the problems associated with a single access on and off the island and congestion at the Langstone roundabout. There are limited food shopping opportunities on the island and the proposal for an out of centre location has to be weighed against the benefits which would be derived from having a larger food store on the island; reducing the need to travel.

The Council is currently producing an Infrastructure Delivery Plan to support the Havant Borough Local Plan 2034. The plan will consider a range of infrastructure improvements, including measures which will help make the island become more self sufficient rather than relying on improved access to facilities on the mainland. One of these measures is better access to services and facilities, including retail. The infrastructure benefits which would be gained from a food store on Hayling Island, despite the lack of town, district or local centre locations, is supported.

Mill Rythe School is located to the east of the site. Over recent years, there have been a number of issues associated with parking at the school during morning drop off and afternoon collection. The car park associated with the proposed store would provide an opportunity for short stay school parking to help alleviate the current congestion. It is suggested that measures to provide such an opportunity would be welcomed.

Highway Implications

As has been highlighted above the concerns of residents regarding the impact of development of Hayling Island on the highway network. Hampshire County Council as Highway Authority, offers it's own pre-application advice service, and as such they have only provided limited feedback on this pre-application. This has advised that the development would be of a scale that applicant would need to provide a full Transport Assessment, which you have submitted and that they clearly have not commented on.

Furthermore they have advised that a Travel Plan would also need to be submitted, which should set out clear aims and objectives, and an action plan of measures to encourage sustainable transport choices to and from the site. The Travel Plan would need to meet the criteria set out in the Hampshire County Council Guidance on Development-related Travel Plans (2009). The Highway Authority have advised that if the applicant wishes to discuss the detailed scope of the Transport Assessment please see the link below providing details of the Highway Authorities Pre-Application Highways Advice service.

<http://www3.hants.gov.uk/highways-development-planning.htm>

The application would require a clear and proactive commitment to encouraging sustainable transport, through the travel plan. Provision for secure cycle storage for both staff and customers is important. Sustainable transport / shared cycle-footways shall be hard surfaced, well lit and a minimum 3m width to allow cyclists to safely pass mobility scooters and pushchairs at any point along routes. Cycle storage for staff and customers will require adequate space for manoeuvring without causing obstruction to pedestrians or vehicles.

Adequate natural surveillance of cycle storage is required for security benefit. Given the site is some distance from a large proportion of Hayling settlement areas, due consideration should be given to providing rapid-charging facilities for mobility scooters and electric vehicles. Does the site have adequate provision for and sufficient, convenient pedestrian access to bus stops for example.

Given the above, the Local Planning Authority strongly advise you to undertake a pre-application with the Highway Authority and liaise directly with them, prior to submitting an application, in order to be able to understand the impact of the development on the highway network. Without the views of the Highway Authority, the Local Planning Authority are not fully able to support the development and could have concerns regarding the impact on the safety and free flow of the network, particularly on the adjacent roundabout junction.

(iii) Impact on the character and appearance of the area

The proposed site sits within the northern edge of the existing settlement area in close proximity to Mill Rythe. The site has a notably agricultural landscape context of mixed fields with well established, mature vegetated boundaries. An application would need to sufficiently appraise the landscape and visual impact of the proposals upon the surrounding landscape and seascape, which shall include reference to appropriate reference documents including:

<https://www.havant.gov.uk/gaps-between-settlements-and-landscape-studies/havant-borough-townscape-landscape-and-seascape>.

The retention and enhancement of the existing mature perimeter hedgerows would be of paramount importance to the local landscape character. An application would need to comprehensively demonstrate protection of existing vegetation, with appropriate landscape enhancement and management measures to enhance the screen density and age-species diversity for long-term benefit.

The extent of retained perimeter vegetation requires accurate representation on the submitted plans and should be clearly distinct from areas of proposed soft landscape. Any proposals to remove vegetation (including standing, deceased trees) would require appropriate habitat mitigation - perhaps including appropriate native planting, bird / bat nesting boxes and deadwood habitat piles for benefit of invertebrates etc.

The submitted plans do not stipulate proposed building heights - information on height, elevations and material finishes will be a particularly important consideration in terms of landscape character and visual impact on the surrounding countryside. Therefore the development needs to have a high quality specification, given its sensitive location on the main road onto the island.

The submitted plans do not demonstrate any soft landscape proposals except for screening trees to the south of the site to mitigate the loss of existing deceased tree. Where tree planting is proposed, native species of local provenance are encouraged. In addition consideration must be given to the internal layout of the car parking, which should be broken up with landscaping. Furthermore a lighting scheme would need to be submitted to ensure that limited light spillage occurs from the development.

The development must also consider how would the site surface water be managed. Would the site have a comprehensive SUDS strategy that includes potential for biodiversity benefit e.g. permeable paving and swales?

In terms of this part of the consideration should a full application be submitted, we would expect to see the following plans; Soft landscaping proposal (including planting species, size, density and tree pit detailing) with subsequent management plan, hard landscaping proposals, drainage strategy, elevations and building material palette.

(iv) Impact on the amenities of neighbouring properties

Given the layout of the proposal the development is not considered to have a significant adverse impact on the amenities of neighbouring properties. However this consideration may change depending on what the submitted size, scale, massing, and layout of the development.

(vi) Flooding and Drainage

The site is located in Flood Zone 3a/b as defined by the National Planning Policy Framework (NPPF) as having a high probability of flooding from rivers or the sea. It is a requirement of the NPPF that any planning application submitted for development within Flood Zone 3 is accompanied by a Flood Risk Assessment (FRA). The Environment Agency, have provided a detailed response, which has been attached at appendix 1. In summary concerns have been raised regarding the workability of the solution proposed for flood storage compensation scheme, amongst the other matters detailed in the response. It is imperative that the issues raised by the Environment Agency are addressed in any planning submission, in order for the Local Planning Authority to be able to move this application forward.

(vii) The Effect of Development on Ecology

The submission includes a Preliminary Ecological Appraisal (The Ecology Partnership, October 2016). The site comprises a horse-grazed pasture with boundary vegetation comprising woodland plus mature hedgerows with trees. It is not considered to be of particular ecological value, with all habitats being well-represented in the immediate landscape. Our Ecologist is broadly in agreement with the conclusions of the assessment and would not raise any overriding concerns in respect to ecological matters on this site.

Any future application should be accompanied by an investigation of data within the Solent Waders & Brent Goose Strategy (SWBGS). This site is not likely to be attractive to any SPA bird species and therefore it would be a relatively straightforward exercise to look at any pre-existing survey data (there is some) and bolster the position that no further survey work is justified. The character of the proposed development would mean that there is essentially no potential for recreational impacts to nearby designated sites.

Any application should be accompanied by full details of any additional survey works completed (e.g. tree assessments for roosting bats where necessary) and a fully-detailed ecological mitigation and enhancement strategy. This should include details of vegetation impacts and compensatory plantings, proposed wildflower areas, features such as bat/bird boxes where used as well as a detailed lighting strategy which avoids excessive illumination of key boundary features.

(viii) Community Infrastructure Levy

The Havant Borough CIL Charging Schedule sets out the following rates for retail development:

Retail

Town centre	£0
Edge of centre > 280 sq m	£80
Out of centre < 280 sq m	£40

The out of centre rate may apply, depending on the size of the proposed store.

Conclusion

In conclusion it is considered that the principle of development is, through the submission of the retail paper, sequentially supportive. However the impact on the highway network, including the infrastructure concerns of Hayling residents, needs to be addressed in dialogue with the Highway Authority. Furthermore the issues raised by the Environment Agency, in combination with further information regarding the impact on the character and appearance of the area and ecology needs to be addressed in any future application.

Please note that the above comments are the opinion of an individual Planning Officer and are in no way binding upon the Council when determining an application for planning permission and nor will they prejudice the outcome of any application submitted.

This advice also only relates to planning matters, and does not relate to any other application that may be required under the Building Regulations or under any other Act, Regulation, Byelaw or Order where the Council's approval may be needed. For further guidance as to the need for consent under the Building Regulations please phone 023 9244 6571.

Yours faithfully

Mr L Oliver
Principal Planner
Our Ref: GEN/17/00276

Mr Lewis Oliver
Havant Borough Council
Civic Offices Civic Centre Road
Havant
Hampshire
PO9 2AX

Our ref: HA/2017/119372/01-L01
Your ref: GEN/17/00276
Date: 17 May 2017

Dear Mr Oliver

PRE-APPLICATION FOR LIDL APPLICATION ON HAYLING ISLAND

MANOR ROAD, HAYLING ISLAND, HAVANT, HAMPSHIRE

Thank you for consulting the Environment Agency on the above enquiry, which was received on 27 April 2017. We are keen to help ensure that new development is as sustainable as possible and therefore appreciate the opportunity to comment on development proposals at this early stage.

The Environment Agency now charges for our detailed planning advice in response to planning enquiries that we receive from our customers. We will still provide a free initial service in the form of a Preliminary Opinion, which outlines our position and highlights any environmental issues we may be concerned with as a statutory consultee. Please find our response to this enquiry below:

Preliminary Opinion

The development raises some environmental concerns/issues and further work will need to be undertaken to show how these issues can be satisfactorily addressed to ensure no adverse environmental impacts.

Flood Zone 3

The site is located in Flood Zone 3a/b as defined by the National Planning Policy Framework (NPPF) as having a high probability of flooding from rivers or the sea. It is a requirement of the NPPF that any planning application submitted for development within Flood Zone 3 is accompanied by a Flood Risk Assessment (FRA).

We have concerns about the workability of the solution proposed for flood storage compensation.

Specifically there are concerns about:

1. the constriction point around the side of the building
2. the risk posed to adjacent properties due to the large displacement caused by the volume of raised ground
3. The workability of the 150mm diameter outfall pipe
4. the close proximity of the large volume of water near the building foundations

Flood compensation areas need to be on a level for level basis and alter the natural gradient of the ground to extend flood zone 3 rather than excavate a depression that

flood water will spill into and discharge to the lower elevations via a 150mm diameter outfall pipe.

Due to the large compensation volume requirement, raising the site elevation to the extent proposed in the FRA is not usually seen within an area of Flood Zone 3 and fluvial flood risk. It is advisable to retain the existing ground levels as much as possible in order to minimise the volume of storage required.

The flood compensation storage area constitutes a land locked scenario because it relies on a 150mm discharge pipe to drain fully. This is not acceptable due to the likely hood of blockage and lack of guaranteed future maintenance for the buildings lifetime.

Instead of the 150mm diameter outfall pipe, we would suggest a reduction of the northern bank of the river to allow flow between the river and the compensation area. However, it must be proven with detailed modelling that the compensation area functions correctly for events at least up to the 1 in 100 year plus 105% climate change event and the surrounding areas are not put at further risk. The swale and compensation area must be freely draining and conform with C697 SuDS Manual (2015).

The proper functioning of flood compensation storage areas and swales are further compromised by the flat gradient which will tend to 'silt up' quicker than those with at least the minimum gradient as per C697 SuDS Manual (2015). Further, discharge of the surface water into the area used for flood compensation is not acceptable as this could lead to a loss of volume for the storage of the fluvial flood volume. Its use as the discharge of surface water from the site would further exacerbate the deterioration of the flood compensation area and silting up of the only outfall for this flood compensation area.

It is not within the EA's remit to provide detailed engineering solutions but we can advise on potential solutions. In this case we would suggest using the car park and potentially also the area to the south of the building as a flood compensation area. The area used should be in hydraulic connection with the flood zone boundary but extend beyond its edge. The area should provide a constant gradient towards the lower elevations of the site. Designs and mitigation measures should show that any flood depths greater than 0.3m do not allow vehicles to float off site.

The final solution submitted for consultation with the EA will need greater proof of the workability of the solution and show that the development does not have a detrimental impact on the surround areas.

Surface Water

Following amendments to the Development Management Procedure Order (DMPO) in April 2015, we are no longer a statutory consultee for surface water drainage. Therefore, we will not be providing advice or comment on the surface water aspects of planning proposals.

Water Framework Directive (WFD)

There should be no deterioration in the water quality of any designated Water Framework Directive (WFD) waterbodies that may be impacted by your proposed development. We recommend the developer/applicant considers opportunities to incorporate improvements to help deliver the objectives of the Water Framework Directive. For further information on the WFD please see our website:

<http://webarchive.nationalarchives.gov.uk/20140328084622/http://www.environment-agency.gov.uk/research/planning/33362.aspx>

Biodiversity

In accordance with the National Planning Policy Framework (NPPF), any development proposal should avoid significant harm to biodiversity and seek to protect and enhance it. Opportunities to incorporate biodiversity in and around the development will be encouraged. We recommend that the applicant/agent refers to 'Building a Better Environment' available from:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289894/LI_T_2745_c8ed3d.pdf

Culverting

If a new culvert is being proposed, the Environment Agency may oppose culverting because it involves the destruction of river channel and bankside habitat. It is damaging to the ecological integrity of the river channel and its corridor and acts as a barrier to the movement of wildlife, including fish.

If the proposal will impact an existing culvert the Environment Agency may oppose planning consent for development either over, or within 8 metres of an existing culvert. Wherever possible, existing culverts should be removed and the river channel and bankside habitat reinstated to restore the ecological continuity of the river channel and its corridor.

Further information can be found online at:

<http://evidence.environment-agency.gov.uk/FCERM/en/FluvialDesignGuide/Chapter8.aspx?pagenum=6>

Foul Drainage

When drawing up wastewater treatment proposals for any development, the first presumption is to provide a system of foul drainage discharging into a public sewer to be treated at a public sewage treatment works (those provided and operated by the water and sewerage companies). This should be done in consultation with the sewerage company of the area prior to the submission of a formal planning application.

If connection to a public sewage treatment plant is not feasible, a package sewage treatment plant may be considered.

Guidance is available online at:

<https://www.gov.uk/government/publications/sewage-treatment-and-disposal-where-there-is-no-foul-sewer-ppg4>

Pollution Prevention

We recommend you incorporate pollution prevention measures to protect ground and surface water. We have produced a range of guidance notes which can be viewed at:

<https://www.gov.uk/government/collections/pollution-prevention-guidance-ppg>

Environmental Permits

This development may require an Environmental Permit for certain activities. The Environmental Permitting Regulations (England and Wales) 2010, cover water

discharge activities, groundwater activities, radioactive substances, waste, mining waste and installations. Please see our website for further information on: <https://www.gov.uk/environmental-permit-check-if-you-need-one>.

For guidance on developments requiring planning permission and an environmental permit please see <https://www.gov.uk/government/publications/developments-requiring-planning-permission-and-environmental-permits>.

Please be aware environmental permits are separate to the planning process and are not guaranteed.

Further Advice from the Environment Agency

Following receipt of the above Preliminary Opinion, if the developer/applicant would like any further detailed advice in relation to their proposal, we would be happy to provide this subject to a charge. We currently charge £84 an hour, per person's time.

As part of this service, a dedicated project manager will coordinate the advice from different teams within the Environment Agency. Our service will include bespoke technical and planning advice if you request this.

This will allow the developer/applicant to have greater clarity on the assessments needed to accompany the planning application and certainty about whether the development is acceptable before a formal application is submitted. Please contact the Sustainable Places team to discuss this further at:

PlanningSSD@environment-agency.gov.uk

Disclaimer

Please note that the view expressed in this letter by the Environment Agency is in response to the enquiry only and does not represent our final view in relation to any future planning application made in relation to this site.

We reserve the right to change our position in relation to any such application.

As part of this preliminary response we have not technically reviewed any documents. This opinion is based on the information submitted and current planning policy and guidance.

Yours sincerely

Mr Jon Maskell
Planning Advisor, Environment Agency

Direct e-mail PlanningSSD@environment-agency.gov.uk

Turley Office

2 Charlotte Place, Southampton, SO14 0TB

T 02380 724 888

Turley