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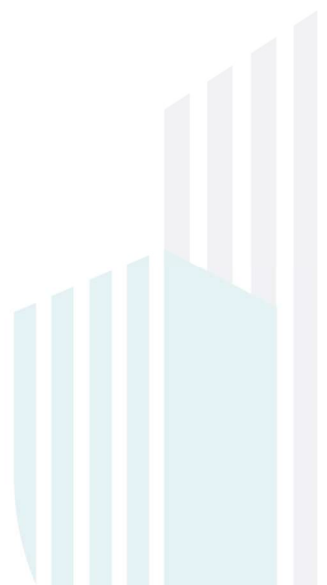
Units 12a/b Solent Retail Park, Havant

Planning Statement

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1 Introduction

- 1.1 This Planning Statement has been prepared by Urban Agile on behalf of Hargreaves Properties Ltd and supports a planning application submitted under s73 of the Town and Country Planning Act 1990 (as amended) at Units 12a/12b Solent Retail Park, Havant (former ICTS Limited site). The planning application seeks permission to vary condition no. 11 of planning permission ref. APP/16/00161 granted on 18th April 2016.

The Application Site

- 1.2 Unit 12a and 12b Solent Retail Park are located to the south of Solent Road on the edges of the town centre at Havant. They are contained within a relatively recently built showroom building that is divided into two units. The eastern unit is occupied by DWF and Grass Direct, whilst the larger western unit is currently vacant, having previously been occupied by Evans Cycles. The vacant unit provides floorspace of approximately 629 sq. m at ground floor level. The entire development provided 948 sq. m and is served by customer car parking for 19 vehicles.
- 1.3 Solent Retail Park is located to the north of the site and comprises larger retail warehouse units with current occupiers including Halfords, Home Bargains, Next, M&S, Pets at Home and Sports Direct. To the east of the application site there is a Tesco Extra store and petrol filling station, whilst to the west there are a number of cottages to Brockhampton Lane and various other showrooms and trade counter units. The A27 Havant bypass is to the south of the site.

Planning History

- 1.4 The original planning permission for the application site was granted in April 2016 (ref. APP/16/00161). This permission was for the redevelopment of the former ICTS Limited site to provide up to 948 sq. m of floorspace for flexible uses including Classes A1, B1a, B1c, B2 and trade counter use, together with associated access, car parking and landscaping. A non-material amendment to this permission was approved in August 2016 to enable elevational changes (ref. AP/16/00764).
- 1.5 Condition no. 11 of planning permission APP/16/00161 controls the permitted retail use and states as follows:

'Use Class A1 floorspace within this development shall only be used for the sale of DIY products (including materials and accessories) and home improvement, gardening and outdoor activities, furniture including hard and soft furnishings and fabrics, carpets and floor coverings, motor vehicles and cycles, electrical goods, office equipment and supplies; in each case to include associated products and ancillary items and accessories, unless otherwise agreed with the Local Planning Authority.'

The Proposal

- 1.6 The purpose of this application is to assist the re-letting of the vacant unit at the application site which has been unoccupied since March 2022. The prospective new tenant is the Salvation Army which operates larger-format charity stores, selling second-hand goods. These goods predominantly fall within the current terms of condition no. 11 and include furniture, furnishings, electrical goods and associated products. These items would be expected to account for 65% of sales floorspace. However, the Salvation Army also sells a range of other second-hand goods including clothing, books, toys and other miscellaneous items. It does not sell food goods or other convenience items.
- 1.7 It is therefore proposed to vary condition no. 11 to enable 35% of the floorspace to be used for the sale of other types of non-food goods and to reflect amendments to the Use Classes Order since the time of the original planning permission. The proposed wording of condition no. 11 is as follows:
- ‘Use Class E(a) floorspace within this development shall primarily be used for the sale of DIY products (including materials and accessories) and home improvement, gardening and outdoor activities, furniture including hard and soft furnishings and fabrics, carpets and floor coverings, motor vehicles and cycles, electrical goods, office equipment and supplies; in each case to include associated products and ancillary items and accessories. No more than 35% of the Use Class E(a) floorspace shall be used for the sale of other types of non-food goods, unless otherwise agreed with the Local Planning Authority.’*

Structure of this Statement

- 1.8 The remaining sections of this Planning Statement are structured as follows:
- Section 2 sets out relevant national and local planning policy;
 - Section 3 considers the principle of the proposed development; and
 - Section 4 provides a summary of our findings and conclusions.

2 Relevant Planning Policy

- 2.1 In this section we summarise the planning policy that is relevant to the consideration of the proposed development. This includes the National Planning Policy Framework (NPPF) and the development plan for Havant which currently comprises the Local Plan Core Strategy of 2011 and the Site Allocations Plan of 2014.

National Planning Policy

- 2.2 The NPPF (2023) sets out the Government's planning policy guidance for England, central to which is the objective of achieving sustainable development. Paragraph 8 outlines three overarching objectives – economic, social and environmental – which are independent but need to be pursued mutually. Planning should help to build a strong and competitive economy by ensuring that sufficient and suitable land is available.
- 2.3 Chapter 7 of the NPPF addresses the vitality of town centres. Paragraph 91 states that local planning authorities should apply a Sequential Test to planning applications for main town centre uses that are not in an existing centre or are not in accordance with an up-to-date Local Plan. Applications for main town centre uses should be located in town centres, then in edge-of-centre locations and, only if suitable sites are not available, should out-of-centre sites be considered.
- 2.4 Paragraph 92 says that when considering edge-of-centre and out-of-centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities are urged to demonstrate flexibility on issues such as format and scale.
- 2.5 Paragraph 94 of the NPPF states that when assessing applications for retail and leisure development outside of town centres which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set threshold. Where there is no locally set threshold then the default threshold is 2,500 sq. m.

Local Planning Policy

- 2.6 The development plan for Havant currently comprises the adopted Core Strategy and Site Allocations Plan. The following policies from the adopted components of the Local Plan are relevant to the proposed development:
- Policy CS4 (Town, District and Local Centres) – this policy identifies the hierarchy of centres within the Borough, with Havant and Waterlooville both designated as town centres at the top of the hierarchy. The supporting text at paragraph 3.39 states that applications for town centre uses outside of designated centres will need to comply with current government policies.
 - Policy CS6 (Regeneration of Borough) – states that planning permission will be granted for development which positively contributes by type of use and design and by its comprehensive approach to the social, economic and/or physical regeneration of the whole Borough.

- Policy CS17 (Concentration and Distribution of Development within Urban Areas) – development will be permitted that makes the most effective use of land in the Borough, including by concentrating new redevelopment within urban areas and prioritising development on previously developed land, including underused land and buildings.

3 Principle of the Proposed Development

- 3.1 In this section, we demonstrate that the proposed development accords with the relevant provisions of the NPPF, together with the development plan for Havant and is therefore acceptable in principle.
- 3.2 At the outset we note that this application is made pursuant to s73 of the 1990 Act and that the principle of retail development at the application site has already been accepted. This application solely relates to the variation of a condition that seeks to control the permitted retail use.

Retail and Town Centre Issues

- 3.3 The application site is located on the very edge of Havant Town Centre, with the town centre boundary running immediately to the north and east of the application site. We note that the main part of Solent Retail Park is included within the town centre but that the application site is excluded, albeit that it falls within the same ownership and management. The site has been in retail use for a number of years, being currently occupied by a flooring store and with a vacant unit that was previously occupied by Evans Cycles. The purpose of this application is to assist the re-letting of the vacant unit which has been unoccupied for more than 2 years.
- 3.4 The proposed tenant is the Salvation Army which will use most of the retail floorspace for the sale of bulky second-hand goods (i.e. furniture, furnishings and electricals) and associated items in accordance with the existing permission. However, it will also use a smaller amount of floorspace for the sale of other non-food goods such as clothing, toys and miscellaneous items. Whilst the principle of retail use at the application site has already been established we have, for completeness, undertaken an up-to-date sequential assessment that accords with paragraph 91 of the NPPF.
- 3.5 Given the very close proximity and excellent links between the application site and Havant Town Centre, the sequential assessment has been focussed on that centre. We note that Phases 1 and 2 of Solent Retail Park are established town centre locations for the sale of comparison and non-bulky goods and are located immediately opposite the application site.
- 3.6 Sequentially preferable sites have been considered in terms of their availability and suitability. As established by case law (including the Supreme Court judgment in Tesco Stores Ltd v Dundee City Council), the suitability of alternative sites must be considered in terms of the development to which the proposal relates and not any alternative scheme.
- 3.7 This proposal relates to a retail use that will predominantly involve the sale of bulky goods and an existing development that comprises two retail units with adjacent surface car parking. It is therefore important that alternative sites provide large, flexible sales areas for the display of such items and that they are served by dedicated car parking to enable customers to transfer and transport bulky goods. Given that the purpose of this proposal is to assist the re-letting of a vacant unit and to satisfy current tenant demand, alternative sites should be available now or within the next six months.
- 3.8 Appendix 1 of this Statement provides details of alternative sites within Havant Town Centre that are currently available or expected to become available shortly. These sites have been

identified from listings on commercial property websites including LoopNet and Rightmove Commercial. Local agents such as Flude list properties on these websites.

- 3.9 As shown at Appendix 1, only one available site within the town centre provides more floorspace than the application site (which provides a total of 948 sq. m). This is the former Wilko store at Meridian Shopping Centre which provides floorspace of just under 2,000 sq. m. This is clearly significantly larger than the existing retail floorspace at the application site and would be unsuitable for the identified occupier requirement. This site would also be unsuitable for the sale of bulky goods because such goods would need to be transferred to car parking on other levels that must be accessed via stairs or lifts.
- 3.10 The next largest unit within the town centre is also at Meridian Shopping Centre but provides floorspace of only 538 sq. m, which equates to 57% of the total floorspace at the application site. It is also almost 100 sq. m smaller than the vacant unit at the application site. Access to this site would also mean it is poorly suited to the sale of second-hand bulky goods such as furniture and electrical goods that will need to be transported by customers. As shown at Appendix 1, all other available sites are significantly smaller and include modern offices and food/drink units. These sites are unsuitable for various reasons including their size, configuration and access.
- 3.11 We therefore consider that there are no available and suitable sites capable of accommodating the requirements of the Salvation Army and that the sequential test set out within the NPPF has been satisfied, insofar as it is relevant to this planning application for the variation of an existing planning condition. The application site is in very well-related to Havant Town Centre and is the most sequentially preferable location for the proposed use.
- 3.12 In terms of retail impacts, we note that Havant does not have an adopted local threshold for impact assessment and the default threshold of 2,500 sq. m set out within the NPPF therefore applies. The existing floorspace at the application site falls well below this threshold and the proposed variation of condition would only allow 35% of this floorspace to be used for the sale of other non-food goods. The site will continue to be pre-dominantly used for the sale of bulky goods and associated items, as is currently permitted.
- 3.13 As such, there is no policy requirement for an impact assessment. Nevertheless, we note that the proposed retail of other non-food goods from the application site will be secondary to the sale of bulky goods currently permitted and that, given the nature of the Salvation Army's operations, these will be donated second-hand goods with no consistent stock. The scope for overlap with the main retail offer of Havant Town Centre is therefore very limited. It is clear that the proposal will not have any significant adverse impacts on the town centre or any other defined centre.
- 3.14 In these circumstances, it has been demonstrated that the proposal will accord with Policy CS4 of the Havant Core Strategy and the provisions of the NPPF.

Other Considerations

- 3.15 The application site forms part of site BD16 which is allocated for employment uses under Policy HB2 of the Allocations Local Plan. This policy pre-dates the current development at the application site. However, we note that the officer report associated with planning permission ref. APP/16/00161 recognised that the provision of showrooms and trade counter uses was

identified as a suitable use within BD16 where they cannot be accommodated in Havant Town Centre. The same conclusions apply in respect of the current application whereby the proposed variation will ensure that the majority of the existing floorspace will be used for the sale of bulky goods and associated items.

- 3.16 We also note that the former Evans Cycles unit has been vacant for more than 2 years and that the proposal will assist the re-letting of the unit, with associated economic benefits. This will support the objectives of Policies CS6 and CS17 of the Core Strategy which encourage the regeneration of the Borough and the re-use of vacant land and buildings.
- 3.17 It is not considered that the proposed variation of condition raises any other issues, including in respect of highways or access. The proposed retail use will be very similar in character to that currently permitted and we are not aware of any issues associated with the operation of the existing access or parking facilities.

Summary

- 3.18 In summary, the proposed variation of condition is acceptable in principle. It will continue to control the permitted retail use and it has been demonstrated that the application site, which is very well-related to Havant Town Centre, is the most appropriate location for the proposed use. The proposal will enable a prominent unit to be re-occupied after being vacant for more than 2 years, will deliver economic benefits and support the activities of a major UK charity.

4 Summary and Conclusions

- 4.1 This Planning Statement has been prepared to support a planning application for the variation of condition no. 11 of planning permission APP/16/00161 to enable 35% of the retail floorspace at Units 12 a/b Solent Retail Park to be used for the sale other non-food goods. The purpose of the application is to assist the re-letting of the former Evans Cycles unit that has been unoccupied since March 2022. The prospective tenant is the Salvation Army which will operate a large charity shop from the site selling furniture, furnishings, electrical goods, associated goods and a range of other items.
- 4.2 In order to accommodate this requirement, it is proposed that condition no. 11 of the existing planning permission is varied as follows:
- ‘Use Class E(a) floorspace within this development shall primarily be used for the sale of DIY products (including materials and accessories) and home improvement, gardening and outdoor activities, furniture including hard and soft furnishings and fabrics, carpets and floor coverings, motor vehicles and cycles, electrical goods, office equipment and supplies; in each case to include associated products and ancillary items and accessories. No more than 35% of the Use Class E(a) floorspace shall be used for the sale of other types of non-food goods, unless otherwise agreed with the Local Planning Authority.’*
- 4.3 This Planning Statement has demonstrated that the proposed development will accord with relevant local and national planning policies. A sequential assessment has been carried out and this has found there are no available and suitable alternatives to the application site. The application site is in established retail use, is well-related to Havant Town Centre and the proposed retail operations cannot be easily accommodated in other sequentially preferable locations. There is no policy requirement for an impact assessment though it is evident that, given the scale and nature of the proposed variation, it would not result in any significant adverse impacts on any defined centres.
- 4.4 We further note that the proposed variation of condition will help to bring a unit that has been vacant for over 2 years back into active use and make a positive economic contribution whilst supporting the activities of a charitable organisation. The application will therefore accord with the requirements of the NPPF and Policies CS4, CS6 and CS17 of the Havant Core Strategy.
- 4.5 We therefore consider that this proposal meets all relevant requirements of local and national planning policy, and we commend this planning application to the Council.

Appendix 1

Schedule of Sequential Sites

Site	Existing Use	Floorspace	Comments on Suitability
Units SU6-8 Meridian Shopping Centre	Retail	1,998 sq. m	The former Wilko store is the largest available unit within the town centre and is being marketed by Flude. Arranged over two floors it provides significantly more floorspace than the application site and could not easily be subdivided. There is no direct access to the car parking on the upper floors making the transfer of bulky goods very difficult. This site is therefore considered to be unsuitable.
Units SU27/28 Meridian Shopping Centre	Retail	538 sq. m	This unit is located on the first floor of the shopping centre with stair/lift access. It provides less than 60% of floorspace of the application site and its position is unsuitable for the sale and transfer of bulky goods such as furniture and large electricals.
24 Park Road South	Offices	478 sq. m	Modern, detached office building arranged over three floors. Site is served by parking for 20 vehicles (with tandem parking spaces) however floorspace is significantly smaller than the application site and its configuration is unsuitable. Conversion of high-quality offices is also unlikely to be viable or feasible.
Langstone House, Solent Road	Offices	465 sq. m	Newly refurbished offices split into various smaller suites over two levels. Unsuitable for proposed use due to size and character of the premises.
Compass House, Meridian Shopping Centre	Offices	354 sq. m	A first and second floor office suite at the junction of Elm Lane and North Street that is significantly smaller than the application site and will therefore be unsuitable.
58 West Street	Restaurant	184 sq. m	Ground floor restaurant with first floor flat. Unsuitable due to size, configuration and lack of car parking.
14 Park Road South	Offices	148 sq. m	Marketed by Hellier Langston this property comprises offices over ground and first floor. It is unsuitable due to its size, configuration and lack of parking.
7c West Street	Retail	142 sq. m	Small unit in pedestrianised section of West Street. Unsuitable for the proposed use due to size and location.
8-10 East Street	Offices	99 sq. m	Office suites to first and second floor being marketed by Tullys. Contained within traditional building and unsuitable due to size, configuration etc.
Unit SU21b Meridian Shopping Centre	Retail	60 sq. m	Small, ground floor unit that is unsuitable on the basis of its small size and position.
7 Park Road North	Café	56 sq. m	Former lodge building that is unsuitable due to both size and type of property.

