



Lewis Oliver
Principal Planning Officer
Planning Services
Havant Borough Council
Public Services Plaza, Civic Centre Road
Havant
PO9 2AX

26th January 2021

Dear Mr Oliver,

Planning Application APP/20/01221 – Land to the west of B&Q, Purbrook Way, Havant

I write in relation to the above planning application and in response to the follow-up Retail Audit (RA) prepared by Stantec, dated 20th December 2021 (received 12th January 2022).

As you are aware, Stantec have now confirmed that they agree with our Sequential Test Assessment (including SPL Rebuttal dated 26th October 2021) and that, importantly, Unit 1 (Dukes Walk, Waterloooville PO7 7HS) (the former Waitrose Unit) cannot be considered suitable for the application proposals, or a flexible form of them.

However, following that advice, Officers have requested further narrative on whether demolition of the former Waitrose unit and construction of a new foodstore (upon the same site) would have any bearing on the conclusions of the sequential test. It would not. We say that for the following reasons:

- The former Waitrose Unit is not being marketed as a 'development' opportunity – rather Columbia Threadneedle (as the Council themselves recognise) are exploring options to surrender the existing lease (which runs until 23rd January 2026).
- It is our understanding that the freehold interest of the site is not available. However, even if it were, it would demand a premium. The site comprises an established anchor foodstore within Dukes Walk, Waterloooville and of a far larger footprint than that proposed through the application proposals. In viability terms, the cost of purchasing the freehold interest would surpass that of the application site (an undeveloped site without the benefit of planning permission etc).
- The existing Dukes Walk Car Park remains fundamental to other retailers. It would likely be excluded from any redevelopment proposal.
- The site area of the former Waitrose is c.0.38 hectares – significantly less than that of the application site.
- Similar to the current arrangement of the former Waitrose unit, any redevelopment proposal for foodstore purposes (of the scale proposed through planning application Ref. APP/21/01221), would also have to adopt a split-level design format.
- In the absence of comprehensive redevelopment proposals, it would be illogical and indeed unviable, for the applicants to purchase the freehold interest of the former Waitrose unit and pursue a redevelopment proposal of largely a similar design to the existing (unoccupied) unit.

- Even if redevelopment was a realistic option (it is not), the site would not be available within a reasonable period of time owing to several factors. These include, but are not limited to, the matter of surrendering the lease, agreeing heads of terms, board approval, contractual obligations, preparing and submitting a redevelopment proposal etc).
- In pure planning terms, redevelopment of the former Waitrose unit needs to be looked at in a comprehensive manner with the long-term development aspirations of Duke Walk.

Further and, arguably of greater importance, any redevelopment scheme for the former Waitrose would introduce a level of flexibility, when compared to the application proposals, that falls far outside the ambit of the sequential test and established within the relevant caselaw.

As such, there can be no credible argument that redevelopment of the former Waitrose site would influence the conclusions of the Stantec Rebuttal in any way. It would not be suitable for the broad type and format of the proposed land use, allowing for appropriate flexibility in respect of format and scale and considering the commercial realities of the applicants' business model. Neither is it considered commercially realistic that an LAD operator would purchase the freehold of the Waitrose site and pursue a redevelopment proposal.

Accordingly, consistent with the advice received by Stantec, the sequential test is passed.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'A Thornton'.

Alastair Thornton

Director