
Employment-led Redevelopment

Planning Statement

Langstone Park, Langstone

Prepared by Barton Willmore LLP
on behalf of XLB Property Ltd

February 2022

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CONTENTS

1.0	INTRODUCTION	4
2.0	FORMAT OF APPLICATION	10
3.0	SITE LOCATION AND CONTEXT	13
4.0	PROPOSED DEVELOPMENT	16
5.0	PLANNING POLICY CONTEXT	19
6.0	PLANNING ASSESSMENT	28
7.0	SUMMARY AND CONCLUSIONS.....	40

APPENDICES

APPENDIX 1: SITE LOCATION PLAN

APPENDIX 2: ILLUSTRATIVE MASTERPLAN

1.0 INTRODUCTION

- 1.1 This Planning Statement is submitted to Havant Borough Council ("HBC") in support of an outline planning application by XLB Property Ltd ("XLB") ('the Applicant') for a proposed employment-led redevelopment of land at Langstone Park, 2B Langstone Road, Havant, PO9 1SA (the "Application Site" or "Site").
- 1.2 The Site extends to c.13.8ha and comprises land currently occupied by a series of campus-style buildings (dating back to the 1960s), within predominantly commercial use (Class E(g)/B2/B8) alongside associated infrastructure including extensive areas of surface level parking. The extent of the Application Site is defined in red on the submitted Site Location Plan (enclosed as **Appendix 1**).

Background

- 1.3 Langstone Park is currently the largest concentration of commercial floorspace within the Borough¹ and is regarded as a '*key employment area*' within the emerging Havant Borough Local Plan. Draft Policy KP6² supports the '*comprehensive redevelopment*' of the Site to provide new or converted employment development with supporting uses and infrastructure. The supporting text recognises the issue of '*dated facilities and lack of appeal to occupiers*' which has led to a decreasing occupancy rate (the Park is currently c.40% vacant). The existing buildings are also highly inefficient and require significant investment to bring them up to standard³ which, in the face of falling occupancy rates, is not an attractive proposition to investors.
- 1.4 In December 2020 the Site was acquired by new owners who are keen to reinvigorate the Site so that it is once again able to fulfil its potential and secure its long-term future as a key employment area within the Borough. Recognising the Site's potential, the new owners have already committed to delivering what is referred to as 'Phase 1' which involves the erection of 11,290 sqm new flexible employment floorspace in the south-western corner of the Site (approved under Ref: APP/21/00405). A contractor has now been appointed and construction is currently scheduled to commence in early 2022.

¹ Paragraph 3.111, Havant Submission Local Plan (updated June 2021)

² As amended by Changes for the Inspector to consider as part of the Examination (CD27-CD27d)

The Planning Application

- 1.5 The extent of the Site is identified on the Site Location Plan (Drawing Ref: 11392-PL008) enclosed at **Appendix 1**.
- 1.6 The Application seeks Outline Planning Permission for the demolition of existing buildings and infrastructure on the Site and development of up to 52,000 sqm new employment floorspace (amounting to 63,290 sqm site-wide in combination with Phase 1) and associated works. The Description of Development is as follows:
- "Phased demolition of existing buildings and the erection of new flexible use employment floorspace (Use Classes E(g)(i)-(iii)/B2/B8) and ancillary uses (Use Classes E(b), E(d) and E(f)); and associated works. All matters reserved except Access".*
- 1.7 The Application is submitted with all matters reserved for future determination save for means of Access into and across the Site. Subsequent reserved matters applications will therefore be required to be submitted to the Council to gain approval for the detailed design of the proposals which will include appearance, layout, scale and landscaping. It is anticipated that future reserved matters applications will be submitted on a phased basis. This application is supported by a set of Parameters Plans and Design and Access Statement and Principles Document (DASPD) which sets out the key components of the scheme and the design principles. Future reserved matters applications will need to accord with these key principles.
- 1.8 The Indicative Masterplan (Drawing Ref: 11392-PL005) submitted as part of this Application demonstrates how a scheme could be designed to meet development management policy objectives. Vehicular access is detailed and utilises the existing access points into the Site from the east and west. Further detail relating to means of access and proposed measures to restrict access from the east is set out within the supporting Transport Assessment (**D.1**) submitted as part of this Application.

³ Evidenced by the Buildings Conditions Report (2020), prepared by Hollis and submitted with the Application (**P.1**).

Engagement

- 1.9 The Proposed Development has been the subject of extensive pre-application discussions with senior officers at HBC (via a Planning Performance Agreement), key stakeholders and the local community. Statutory consultees such as Hampshire County Council and National Highways have also been extensively engaged.
- 1.10 In order to ensure that the community and relevant stakeholders had sufficient opportunity to find out about the proposals, a consultation website was launched on 26 November 2021. This contained key information on the proposals, including detailed images, and encouraged visitors to submit feedback.
- 1.11 Overall, 71% of the feedback received was supportive of the principle of the proposals to regenerate the Site. Further details of the consultation responses is set out within the Statement of Community Involvement **(0.1)**, submitted with the application.
- 1.12 As part of the engagement process, a virtual meeting took place on Wednesday 5th January 2022 between members of the XLB project team and representatives of two community groups: the Langstone Residents' Association and the Langstone Village Association. This was a generally positive meeting and details of the issues discussed is set out within the Statement of Community Involvement **(0.1)**.

Scheme Objectives and Benefits

- 1.13 Once complete, the Proposed Masterplan Development (including Phase 1) is expected to deliver the following significant benefits to the Site and wider locality:
- Delivery of modern, high-quality and highly sustainable development in an accessible location and utilising previously developed land.
 - Replacement of existing buildings nearing the end of their functional life and facing a downward trajectory in terms of demand/occupation with modern, purpose-built, flexible employment floorspace within a key employment area. This will ensure that the Site continues to meaningfully contribute towards the Council's stock of employment land.

- The potential to support between 837 and 1,793 gross FTE on-site jobs (dependant on end occupiers), which could support between 1,088 and 2,332 gross indirect jobs (in addition to jobs created during phases of construction estimated at 120 jobs per month). This would generate a direct GVA of between £44.0m and £133.7m and an indirect GVA of between £57.4m and £123.0m.
- An estimated contribution of between £1.7m and £3.1m per annum in business rates, to the funding of local public services.
- A significant enhancement in the overall energy performance of the Site through the replacement of the existing highly dated and inefficient (gas heating) system with energy efficient, all electric heat pumps. This has the potential to reduce carbon emissions by c.80%. Aspirations to maximise sustainability throughout all aspects of the Development are embedded at the outline stage and will provide a new benchmark for the Borough.
- Delivery of improvements within the Site to enhance pedestrian and cycle accessibility and permeability.

Submission Material

- 1.14 This Planning Statement forms part of a series of documents that are submitted in support of and as part of the planning application, as set out in Table 1.1. For ease of reference the documents have been catalogued.

Table 1.1 Planning Application Documents

Doc Ref	Document	Reference/Date	Author
-	Planning Application Form	22 February 2022	Barton Willmore
A.1	Covering Letter	22 February 2022	Barton Willmore
A.2	Planning Statement (this document)	February 2022	Barton Willmore
B.1	Site Location Plan	11392-PL008	PRC
B.2	Parameter Plans - Access	11392-PL002	PRC
B.3	Parameter Plans – Development Plots	11392-PL004	PRC
B.4	Parameter Plans – Building Height	11392-PL003	PRC
B.5	Parameter Plans – Indicative Phasing	11392-PL001	PRC
B.6	Landscape Framework Strategy	11392-PL006	PRC

Doc Ref	Document	Reference/Date	Author
B.7	Landscape General Arrangement (Sheets 1-4)	11392-PL011	PRC
B.8	Indicative Masterplan	11392-PL005	PRC
B.9	Indicative Site Sections	11392-PL007	PRC
C.1	DAS and Principles Document (DASPD)	February 2022	PRC
D.1	Transport Assessment	February 2022	Motion
D.2	Framework Travel Plan	December 2021	Motion
E.1	Economic Benefits Statement	February 2022	Barton Willmore
F.1	Sustainability and Energy Statement	February 2022	Envision
G.1	Flood Risk Assessment and Drainage Strategy	December 2021	BMP
H.1	Arboricultural Impact Assessment	January 2022	SJS
I.1	Preliminary Ecological Appraisal	February 2022	Phlorum
I.2	Biodiversity Net Gain Report	February 2022	Phlorum
J.1	Air Quality Assessment	February 2022	Phlorum
K.1	Odour Technical Note	December 2021	Phlorum
L.1	Noise Assessment	December 2021	Spectrum
M.1	Land Quality Assessment	February 2022	BMP
N.1	Heritage Statement	February 2022	EDP
O.1	Statement of Community Involvement	January 2022	BECG
P.1	Existing Buildings Conditions Statement (Summary Report)	November 2020	Hollis
Q.1	Utilities Statement	December 2021	BMP

- 1.15 A separate formal request for an EIA Screening Opinion has been submitted to the Council. This concludes that the proposals are not considered to constitute EIA development.

Statement Contents

- 1.16 The structure of this Statement is as follows:

- **Section 2** outlines the format of the Application.

- **Section 3** describes the Site and the main features in the surrounding area and provides a summary of the relevant planning history for the Site.
- **Section 4** outlines the relevant planning policy context of the Site and the Proposed Development.
- **Section 5** sets out a planning assessment of the Proposed Development including overall compliance with adopted Development Plan Policy and other material considerations.
- **Section 6** provides an overall summary and our conclusions on the appropriateness of the Proposed Development and its acceptability in planning terms.

2.0 FORMAT OF APPLICATION

Background

- 2.1 This is an Outline Application with all matters reserve expect Access. The Site Location Plan confirms the area for which Outline Planning Permission is sought which excludes land subject to planning permission Ref: APP/21/00405. A condition will be invited which requires all subsequent Reserved Matters applications to be submitted within the parameters set by the Parameter Plans **(B.2-B.5)** and in accordance with the DASPD **(C.1)**, which form part of the consideration of the Application.

The Proposal

- 2.2 The form of the application and the level of information required to support the Application has been the subject of discussion with senior officers at HBC. Following these discussions, it has been agreed that the outline application approach supported by Parameter Plans and Design Principles is appropriate. The Application therefore provides sufficient information for the decision maker to assess the effect of the Proposed Development; understand and assess the level of design quality; and the principles which any Reserved Matters applications will need to stringently follow.
- 2.3 For clarity, the application framework and appropriateness of this approach is summarised below.

Application Framework

- 2.4 The application takes the form of an Outline Planning Application, with access and a set of Parameter Plans and Design Principles submitted for approval. All other matters, namely layout, scale, appearance, and landscaping are reserved for future approval.
- 2.5 The submitted Parameter Plans define the principles of development sought within the planning application and cover the following:
- Application Site Boundary (Drawing Ref: 11392-PL008) **(B.1)**;
 - Means of Access (Drawing Ref: 11392-PL002) **(B.2)**;

- Development Plots (Drawing Ref: 11392-PL004) **(B.3)**;
 - Building Heights Drawing (Ref: 11392-PL003) **(B.4)**; and
 - Indicative Phasing (Drawing Ref: 11392-PL001) **(B.5)**.
- 2.6 A Landscape Framework Strategy (Drawing Ref: 11392-PL006 **(B.6)** and Section 6.0 within the DASPD **(C.1)**) has also been submitted which provides a framework for detailed landscaping proposals to adhere to.
- 2.7 The DASPD details the major elements of land use and the design rationale for the development. Once approved, these will provide a basis for future Reserved Matters submissions.

The Approach

- 2.8 The outline planning approach is considered appropriate as it addresses a number of key issues:
- **Provide flexibility:** the detailed design of the Proposed Development is likely to be subject to change to reflect market conditions, to accommodate improved building techniques and/or occupier requirements. The outline application allows flexibility to address these potential changes whilst adhering to the principles of development established under the Parameter Plans and Design Principles (set out within the DASPD). Importantly it also enables development and the submission of subsequent reserved matters to come forward in phases over a longer-term period (i.e. 10 years).
 - **Minor amendments:** the outline approach allows for minor changes within the Design Principles to be addressed and the scheme finalised for Reserved Matters submissions without the expense and delay of a fresh full planning application.
 - **Certainty:** the outline approach establishes the 'principle' of the development but allows sufficient flexibility through the submission of reserved matters for the applicant to make minor amendments to the scheme. Importantly it allows HBC to remain in control of the scheme design through the usual development control process (i.e. the ability to refuse Reserved Matters applications if they are considered unacceptable and/or not in compliance with conditions set at the outline permission stage).

2.9 The approach therefore has the following benefits:

- Provides a planning permission with commercial clarity/certainty at an early stage but with essential flexibility.
- Provides an opportunity to respond to market conditions and/or occupier demand by delivering a flexibility of uses through a number of development Phases.
- Provides the Applicant with confidence that the principle of the scheme has been established to allow for further investment in detailed design stages.
- Provides a basis for HBC management and control of subsequent design processes and a clear and legal basis for protection of design quality. The local authority retains control of the scheme design and acceptability of the application proposals throughout the development control process.

The Submission

2.10 Key to the delivery and success of such an approach is ensuring sufficient information is available within the planning application to assess design quality and the effective use of conditions to control this and other requirements through Reserved Matters.

2.11 Fundamental elements of this process are the Design Principles (within the DASPD) and Parameter Plans that form the determination 'drawings' for the planning application. The DASPD also demonstrates how the parameters and principles will deliver design quality and an appropriate form of development.

2.12 These documents outline the parameters of the Proposed Development (e.g. land use, form and scale, quanta etc.) and where necessary and appropriate, provide additional detail on design issues.

3.0 SITE LOCATION AND CONTEXT

The Site

- 3.1 The boundary of the Site is identified in red on the Site Location Plan, included in **Appendix 1**. The Site falls within the existing Langstone Park ("the Park") which is located to the south of Havant Town Centre separated by the Havant Bypass (A27), and to the north of Hayling Island on the western side of Langstone Road (A3023). Langstone Road provides the main access to the A27 and Havant Town Centre to the north, and also to Hayling Island.
- 3.2 The Park itself is bound to the south and west by commercial development; to the north by boundary vegetation and the A27 Havant Bypass (beyond which is Havant Town Centre); and to the east by a generous landscape buffer, beyond which is a pub and hotel and a residential area.
- 3.3 The Park, as existing, can broadly be divided into three areas, as follows:
- The northern section, which incorporates Building 1000 and parking;
 - The central section, which contains office buildings, a data centre and acts as the amenity core for the park (including a nursery); and
 - The southern section, which is predominantly parking, with plant to the far west.
- 3.4 The Park is accessed from Langstone Road to the east and Brookside Road to the west. Both accesses are joined by interior service roads. The Park is not subject to any land use designations or allocations within the adopted Local Plan and lies within Flood Zone 1. The existing buildings on the Site are considered collectively as non-designated heritage assets and there are trees subject to TPOs around the Site boundaries to the north-west and south-east.
- 3.5 The Site is shown on the adopted Havant Borough Core Strategy Proposals Map as falling within a Safeguarding Area as defined by the Hampshire Minerals and Waste Plan (HMWP). However, this was based on the HMWP (2007) which was subsequently replaced by the current HMWP adopted in 2013. The current adopted position shows that the Site does not fall within a safeguarding area. In accordance

with s.38(5) of the Planning and Compulsory Purchase Act 2004⁴ the inconsistency should be resolved in favour of the HWMP. Notwithstanding that the Site itself does not fall within a safeguarding area, we note that there are safeguarding areas in relative proximity to the west and south.

- 3.6 The 'Phase 1' site which is subject to planning permission Ref: APP/21/00405 (an amendment to the original permission Ref: APP/19/00703) is located within the south-western portion of the Site. This land sits outside the Outline Application area but clearly forms part of the overall Masterplan for the Site (and is shown on the Indicative Masterplan, enclosed in Appendix 2).

Surrounding Area

- 3.7 As noted above, the Park is surrounded by a wide range of land uses. To the north of the Park lies Havant Town Centre, specifically the Tesco Superstore, Solent Road Retail Park and other associated development. To the south and west lies commercial development of a similar scale to the Park, with development up to the Park's boundary. To the east, lies a pub and a hotel and residential uses.

Relevant Planning History

- 3.8 On 22 July 2020, planning permission (Ref: APP/19/00703) was granted for '*part-demolition of Building 1000 and associated works; the erection of new flexible use industrial units; and a new parking layout with associated works to layout and access and felling of two trees subject to a Tree Preservation Order (Norway Maples)*' (the "Original Phase 1 Permission").
- 3.9 This permission has been implemented and the partial demolition of Building 1000 has been completed. A subsequent S73 application (Ref: APP/21/00405) was granted on 25 August 2021 (the "Phase 1 Permission"). This secured the reconfiguration of new employment units in the south-western corner of the Site and a modest reduction in floorspace (from 13,476 sqm GEA to 11,290 sqm GEA). The Applicant is currently in the process of seeking the discharge of pre-commencement conditions attached to the Phase 1 Permission to enable

⁴ Section 38(5) states that "*If to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan*"

construction to commence in early 2022. The wider Masterplan for the Site has been developed having regard to, and incorporates, the Phase 1 Permission.

4.0 PROPOSED DEVELOPMENT

Background

- 4.1 Having been originally developed in the 1960s and to a bespoke specification linked to IBM's operations at that time, the Site today is tired and increasingly unsuitable for modern operator requirements. This is manifested by increasing vacancies and low marketing prospects, despite best endeavours. As a result, the Site, in its current condition, is considered to be on a downward trajectory in occupancy terms. The extent to which the Site will continue to make a meaningful contribution to the local economy (bearing in mind its significance as a key employment area) is therefore uncertain.
- 4.2 The Proposed Development provides a unique opportunity to address the challenges facing the existing site and to start a new chapter in the Site's history, aimed at securing its long-term attractiveness and success befitting its status as a key employment area, and the largest concentration of employment floorspace in the Borough.
- 4.3 The Proposed Development is described in greater detail in the DASPD submitted with the Application. To summarise, the key aspects of the Proposed Development are set out below.

The Proposals

- 4.4 Outline planning permission is sought for up to 52,000 sqm GEA flexible Class E(g)(i)-(iii) and/or B2 and /or B8 floorspace, of which no more than 3,000 sqm GEA will offices (Class E(g)(i)) and no more than 450 sqm GEA will be supporting amenity uses (Class E(b)/E(d)/E(f)). The Indicative Masterplan shows how this could be arranged across a number of buildings, ranging in size so as to appeal to different occupier requirements.
- 4.5 The Site has been divided into Indicative Development Plots (Drawing Ref: 11392-PL004) within which we have identified a maximum 'capacity' to accommodate new employment floorspace. This is set out in more detailed within the DASPD **(C.1)**, but also summarised below:
- Plot A – up to 9,000 sqm GEA;

- Plot B – up to 3,000 sqm GEA (including 450 sqm amenity uses)
 - Plot C – up to 40,000 sqm GEA
- 4.6 The height of new buildings is not expected to extend beyond 2-storeys, with a maximum height of 15.8m (above ground level) across Plots A and C. A reduced maximum height of 12m is proposed over Plot B to enable a transition between the surrounding area and the centre of the Park and to provide layering and visual interest to the roofscape. This relationship is illustrated on the indicative Site Sections (Drawing Ref: 11392-PL007) **(B.4)**.
- 4.7 Access into and across the Site is proposed in detail. The Site will continue to be accessed via Brookside Road to the west and Langstone Road to the east, as per the existing arrangement. The existing Penner Road access to the south will be retained but will not be used for vehicular access/egress except in the case of an emergency as per the existing arrangement. The Langstone Road access will continue to be subject to restrictions, controlled by a proposed new barrier and ANPR system. Full details of the proposed access arrangement and control measures is set out in the Transport Assessment submitted with the Application.
- 4.8 Within the Site, a new Primary Access Route is proposed (as shown on Drawing Ref: 11392-PL002) **(B.2)** which is intended to enable full circulation of the Site internally for all service vehicles, general users and pedestrians/cyclists. This route will connect with the main site accesses and existing pedestrian/cycle links to the wider area. The primary access route will comprise a 7.3m minimum width road along with a pedestrian footpath/cycle link and soft landscape areas. A series of secondary access routes, located off the Primary Access Route, will provide access to car parking and service yards serving the various buildings.
- 4.9 A series of new footways/cycle routes, separated from vehicular traffic, are proposed to enhance permeability across the Site. In addition, enhancements are proposed to the existing public footpath in the north-eastern corner of the Site and along the eastern boundary to facilitate and encourage pedestrian and cycle movement across this part of the Site. There is also considered potential to replace existing pedestrian/cycle signage in the surrounding area to improve wayfinding.
- 4.10 Whilst details of landscaping are reserved for later approval, a Strategic Landscape Framework (Drawing Ref: 11392-PL006 **(B.6)** and Section 6.0 of the DASPD **(C.1)**) has been submitted in order to establish the core principles for future reserved

matters applications to accord with. This identifies three Character Areas which correspond to proposed activities within the Site and are described in more detail in the DASPD and also shown indicatively on the Landscape General Arrangement drawings (Drawing Ref: 11392-PL011) **(B.7)**.

- 4.11 As set out within the Arboricultural Impact Assessment **(H.1)** submitted with the application, the proposals are expected to result in the removal of 60 trees and 9 tree groups (although a number of these have already been identified for removal under the Phase 1 Permission (Ref: APP/21/00405). The Strategic Landscape Framework commits to incorporating a significant number of new trees, significantly in excess of the number to be removed. All existing trees with Tree Preservation Orders (TPOs) are to be retained.
- 4.12 The Application is accompanied by an Illustrative Masterplan **(B.8)** for the Site to demonstrate that an appropriate layout can be achieved. The Appearance and Scale of the proposed buildings will be fixed at reserved matters stage. The accompanying DASPD **(C.1)** demonstrates the suitability of delivering the scale of development proposed on the site, having regard to neighbouring uses and development management considerations.

Ten Year Planning Permission

- 4.13 There is an indicative phasing strategy **(B.5)** which seeks to deliver the comprehensive redevelopment of the Site in a phased approach aimed at minimising disruption to, and with the potential to re-home, existing occupiers (some of which are on leases which extend up to 2030). This is intended to maintain as much of the existing employment on the site as possible. As such, it is anticipated that the Site will be developed over a 10-year period and this application therefore seeks a 10-year planning permission to enable the phasing of development over this period.
- 4.14 The Town and Country Planning Act 1990 (as amended) Section 91 sets out legislation for the general condition limiting the duration of a granted planning permission can be implemented (normally three years). Section 91 (1) (b) is clear that local planning authorities can grant planning permission for longer periods if the authority consider it appropriate having regard to the provisions of the Development Plan and to any other material considerations. In this instance and having regard to the important contribution the Site makes to the local economy, this is considered appropriate.

5.0 PLANNING POLICY CONTEXT

5.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act, planning applications are to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the Site comprises:

- Havant Borough Core Strategy (March 2011);
- Havant Borough Local Plan (Allocations) (July 2014); and
- Hampshire Waste and Minerals Plan (October 2013).

5.2 The National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance (PPG) is also a material consideration in the determination of planning applications.

National Planning Policy Framework (NPPF) (July 2021)

5.3 The NPPF was most recently updated in July 2021 and sets out the Governments objectives for achieving sustainable development. The NPPF outlines a series of considerations against which development would need to be assessed.

Achieving sustainable development

5.4 At the heart of the NPPF is a presumption in favour of sustainable development. For decision-taking, this means approving development proposals that accord with the development plan without delay (paragraph 11) unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole.

Building a strong, competitive economy

5.5 Paragraph 81 encourages decisions to help create the conditions in which businesses can invest, expand and adapt and '*significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*'.

5.6 Paragraph 83 additionally encourages decisions to recognise and address the specific locational requirements of different sectors. This includes making provision

for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

Promoting healthy and safe communities

- 5.7 Paragraph 92 encourages the creation of healthy, inclusive and safe places which promote social interaction; are safe and accessible; and enable and support healthy lifestyles.

Promoting sustainable transport

- 5.8 Paragraph 104 encourages transport issues to be considered from the earliest stages of development proposals so that the potential impacts on transport networks can be addressed; opportunities from existing or proposed transport infrastructure are realised; opportunities to promote walking, cycling and public transport are identified and pursued; the environmental impacts of traffic and transport infrastructure can be identified assessed and taken into account; and patterns of movement, parking and other considerations are integral to the design of schemes, contributing to making high quality places.
- 5.9 Paragraph 105 encourages significant development to be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 5.10 Paragraph 111 states that '*development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe*'.

Making effective use of land

- 5.11 Paragraph 119 encourages decisions which promote the effective use of land and Paragraph 120 calls for substantial weight to be given to the value of using suitable brownfield land within settlements to meet identified needs. Decisions should also promote and support the development of under-utilised land and buildings (Paragraph 120).

Achieving well-designed places

- 5.12 The Government attaches great importance to the design of the built environment. The creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve, and good design is a key aspect of sustainable development.
- 5.13 Paragraph 130 encourages decisions to ensure that developments will: function well and add to the overall quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history; establish or maintain a strong sense of place; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development; and create places that are safe, inclusive and accessible which promote health and well-being.

Meeting the challenge of climate change, flooding and coastal change

- 5.14 Paragraph 152 calls for the planning system to support the transition to a low carbon future in a changing climate. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources; and support renewable and low carbon energy and associated infrastructure.
- 5.15 Paragraph 169 requires all major developments to incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.

Conserving and enhancing the historic environment

- 5.16 Paragraph 189 recognises that heritage assets range from sites and buildings of local historic value to those of highest significance. In determining applications, Applicants are required to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance (Paragraph 194).
- 5.17 Paragraph 203 requires the effect of an application on the significance of a non-designated heritage asset to be taken into account in determining the application.

In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Planning Practice Guidance

- 5.18 The Planning Practice Guidance ("PPG") was originally published in March 2014 and is periodically updated. The PPG provides additional guidance to support the NPPF.

The Development Plan

Havant Borough Core Strategy (2011)

- 5.19 The Core Strategy was adopted in March 2011 and sets out the planning framework for the Borough up to 2026. It contains strategic policies and detailed development management policies against which individual planning applications are to be determined.
- 5.20 The Core Strategy's overview of Havant recognises the contribution of the business areas to the south of the town centre, which includes Langstone Park.
- 5.21 **Policy CS2** (Employment) seeks to deliver 162,000 sqm of new employment floorspace between 2006 and 2026. Proposals for the provision of new employment floorspace will be supported which *inter alia* prioritise the use of previously developed land; safeguard existing employment sites and allocations; and provide job, generate wealth or produce an economic output on existing employment sites that are not fit for purpose. This is supported by **Policy DM2** which seeks to safeguard existing employment sites from development proposals for non-employment uses.
- 5.22 **Policy CS3** (Skills and Employability) supports proposals that *inter alia* raise skill levels and increase employability; tackle skill shortages in existing and potential business clusters and sectors particularly advanced manufacturing and marine businesses; and promote skills provision in emerging growth sectors.
- 5.23 **Policy CS11** (Protecting and Enhancing the Special Environment and Heritage of Havant Borough) seeks to ensure that proposals protect and where possible enhance statutory and non-statutory designations within the Borough.

- 5.24 **Policy CS13** (Green Infrastructure) supports proposals which incorporate improvements to existing green infrastructure through the restoration, enhancement or creation of additional resources.
- 5.25 **Policy CS14** (Efficient Use of Resources) supports proposals which maximise on-site renewable energy production and resource efficiency and, in the case of non-residential development over 500 sqm, meets BREEAM 'Very Good' standard.
- 5.26 **Policy CS15** (Flood and Coastal Erosion Risk) requires all developments to ensure that there is no net increase in surface water run-off and in line with the NPPF (paragraph 169) priority should be given to incorporating Sustainable Drainage Systems (SuDS) to manage surface water drainage, unless it is proven that this would be appropriate.
- 5.27 **Policy CS16** (High Quality Design) requires proposals to be designed to a high standard which *inter alia* draws on inspiration from and respect the local context; produces a positive relationship between buildings, streets and spaces; contributes to improvements to the public realm; mitigates negative environmental impacts; and adapts to the changing needs of user and climate change.
- 5.28 **Policy CS17** (Concentration and Distribution of Development within Urban Areas) supports proposals which make the most effective use of land by concentrating development within existing urban areas (including Havant) and prioritises development on previously development land, including underused land.
- 5.29 **Policy CS20** (Transport and Access Strategy) supports proposals which will not increase congestion and promotes better use of existing transport networks. Proposals which improve accessibility to employment and promotes equality in the transport system will also be supported. Policy CS20 is supported by Policies **DM11** (Planning for More Sustainable Travel) and **DM12** (Mitigating the Impacts of Travel). **Policy DM14** requires parking for cars, motorcycles and bicycles to be provided in accordance with the relevant standards (as set out within the Parking SPD, updated September 2019).
- 5.30 **Policy DM8** (Conservation, Protection and Enhancement of Existing Natural Features) requires proposals to protect and enhance local habitats and natural features of nature conservation and/or amenity importance.

- 5.31 **Policy DM10** seeks to protect the health and safety of existing and future uses or a site and the amenity of neighbour occupiers and residents from pollution (including noise, air, light and water). Development will only be permitted in cases where all relevant criteria listed under Policy DM10 is met.

Havant Borough Local Plan (Allocations) (2014)

- 5.32 The Local Plan (Allocations) document was adopted in July 2014 and provide details of land allocations necessary to deliver the objectives of the Core Strategy. It also includes a number of additional development management policies aimed to ensure that the Local Plan (incorporating the Core Strategy) is fully compliant with the NPPF.
- 5.33 **Policy AL1** (Presumption in favour of Sustainable Development) reiterates the presumption in favour set out within the NPPF.
- 5.34 **Policy AL2** (Urban Area Boundaries and Undeveloped Gaps between Settlements) defines the extent urban area boundaries, with reference to the adopted Policies Map.
- 5.35 **Policy DM17** (Contaminated Land) requires an appropriate investigation of potential risks to be undertaken by the developer, for any identified risks to be mitigated and any necessary remediation measures undertaken to protect human health, groundwater and the wider environment.
- 5.36 **Policy DM18** (Protecting New Development from Pollution) reiterates Core Strategy **Policy DM10** and will only support proposals where the projected levels of air, noise, vibration, light, water or other pollution do not have a significant negative affect on the amenity of future occupiers or users of the proposed development.
- 5.37 **Policy DM20** (Historic Assets) requires applications which affect heritage assets to provide a Heritage Statement which describes the significance of the asset and its setting and sets out the impact of the development and any necessary mitigation, proportionate to the impact and the significance of the heritage asset.

Supplementary Planning Documents (SPDs)

Parking SPD (updated September 2019)

- 5.38 The Parking SPD sets out the Council's off-street parking standards relating to new development. The standards of relevance to the Proposed Development are considered in more detail in the Transport Assessment submitted with the Application.

Emerging Local Plan

- 5.39 The Council are in the advanced stages of preparing a new Local Plan, although there is currently uncertainty as to whether the Plan will proceed to adoption. The Havant Borough Local Plan was submitted for examination on 12 February 2021 and initial (Stage 1) hearings took place in July 2021.
- 5.40 The Inspectors Interim Findings Report⁵ recommends that the Council withdraw the Local Plan from the examination process in order to undertake further work considered necessary (largely relating to housing allocations). The Council are currently in discussions with the Inspectorate on the potential to enable the Plan to progress with a commitment to undertake an immediate review. Against this backdrop, the weight to be attached to emerging policies is limited.

Havant Borough Local Plan Submission Version (February 2021, updated June 2019)

- 5.41 The Havant Borough Local Plan was originally submitted for examination on 12 February 2021. Alongside the Submission Version, the Council submitted 'Changes for the Inspector to Consider as part of the Examination' dated 12 February 2021. Further Changes for the Inspector to Consider as part of the Examination have subsequently been submitted, the most recent dated 16 September 2021⁶. Our review of emerging policies draws on the changes proposed and not the Submission Version (as amended). On the basis that the future of the emerging Plan is uncertain, only limited weight may be applied to emerging policies in any event.
- 5.42 As part of the Vision for Havant, the Local Plan seeks to ensure that people have access to high quality new employment, education and training opportunities to

⁵ Examination Library CR18

boost economic growth and address the skills gap. This will be achieved through new and refurbished business development which will consolidate and reinforce the Borough's reputation as a centre for high technology and advanced manufacturing and as an excellent place to start a new business. It is also envisaged that Langstone Technology Park will continue with further commercial development, reinforcing its position as a key employment hub (our emphasis).

- 5.43 Draft **Policy DR1** (Delivering Sustainable Development in Havant Borough) makes provision for c.96,965 net additional sqm of employment floorspace in the Borough between 2016 and 2037 and highlights the Council's commitment to planning positively and collaboratively to achieve high quality, sustainable development which meets the Borough's needs.
- 5.44 Draft **Policy DR2** (Regeneration) supports the development and intensification of brownfield sites to provide as much of the Borough's development needs as possible.
- 5.45 The Site is recognised as a Key Project which is subject to draft **Policy KP6** (Langstone Technology Park). This recognises that the Park is currently the largest concentration of commercial floorspace in the Borough and a key employment area. It is also acknowledged however, that occupancy levels at the Site are declining due to emerging competition, dated facilities and lack of appeal to occupiers.
- 5.46 Further growth, through provision of new business employment on the Site, is recognised for its potential to boost the Borough's prosperity. Draft Policy KP9 therefore supports 'comprehensive redevelopment providing new or converted employment development with supporting uses and infrastructure', subject to development management considerations (our emphasis).
- 5.47 Draft **Policy KP6** also requires development on the Site is also required to *inter alia*:
- provide for a range of employment opportunities and support the needs of emerging sectors;
 - provide complementary non-employment uses;
 - retain and enhance pedestrian and cycle routes through the Site;

⁶ Examination Library CD27d

- ensure suitable access to the Site; and
 - provide sufficient parking, including during the phase redevelopment of the Site.
- 5.48 Part h. of Policy KP6 refers to the need for opportunities to be explored for the prior extraction of minerals to the satisfaction of Hampshire County Council. However, as noted at paragraph 3.5, the Site is not located within a safeguarding area (as shown on the adopted HWMP (2013) policies map). This part of draft policy is not therefore consistent with the adopted HMWP (2013) and should not be given any weight in the determination of this application.
- 5.49 Other draft policies considered of relevance to the Proposed Development include the following:
- **Policy IN1** (Effective Provision of Infrastructure);
 - **Policy IN3** (Transport and Planning);
 - **Policy IN4** (Access onto Classified Roads);
 - **Policy E1** (High Quality Design);
 - **Policy E2** (Health and Wellbeing);
 - **Policy E12** (Efficient Use of Resources and Low Carbon Design);
 - **Policy E13** (Historic Environment and Heritage Assets);
 - **Policy E14** (The Local Ecological Network);
 - **Policy E18** (Trees, Hedgerows and Woodland);
 - **Policy E20** (Drainage Infrastructure in New Development);
 - **Policy E22** (Amenity and Pollution);
 - **Policy E23** (Air Quality);
 - **Policy E24** (Contamination); and
 - **Policy C1** (Protection of Existing Employment Areas)

Policy Conclusions

- 5.50 Arising from the above review, whilst the emerging Local Plan has stalled, there is a clear recognition (which builds on the adopted Core Strategy) of the important contribution the Site has to offer to the local economy. Whilst the adopted Core Strategy does not preclude the redevelopment of the Site (subject to development management considerations), the Council's emerging policy recognises the increasingly challenged future of the existing Site and in seeking to support its on-going success, expressly supports comprehensive redevelopment which responds appropriate to its context and is sufficiently served by necessary infrastructure. These issues are considered in further detail in Section 6.

6.0 PLANNING ASSESSMENT

- 6.1 This Section assesses the Proposed Development against the planning policy context and issues identified in Section 5. It draws upon the extensive analysis that has been undertaken as part of this Planning Application and is set out in the Application supporting documents. Reference is made to the findings of technical reports submitted in support of the Planning Application where necessary to avoid unnecessary repetition.

Principle of Development

- 6.2 The Site is not subject to any specific land use designations within the adopted Core Strategy. However, the Site lies within the urban area (as defined by Policies CS17 and AL2) and constitutes previously developed land which is prioritised for the provision of new employment space under Policy CS2.
- 6.3 Policy CS2 also expressly seeks to provide jobs, generate wealth or produce an economic output on existing employment sites that are not fit for purpose. Whilst the Application Site is considered fit for economic purposes, in its current condition, it is not capable of fulfilling or maximising its potential. There is therefore a clear opportunity to enhance its economic output through comprehensive redevelopment which would clearly align with the objectives of Policy CS2.
- 6.4 The Site's potential to enhance its long-term contribution to the local economy is clearly recognised within the emerging Local Plan which identifies the Site as a Key Project which is subject to draft Policy KP6. This supports the comprehensive redevelopment of the Site subject to development management considerations and compliance with the set of listed criteria (considered further below). Whilst the emerging Local Plan can only be afforded limited weight at this stage, draft Policy KP6 provides a reasonable indication of the direction of policy and with which the proposals are fully aligned.

Economic Benefits

- 6.5 The Proposed Development will deliver significant economic benefits in the form of new employment opportunities (both operational and during the construction phase) and associated increases in productivity and GVA; in addition to securing the long-term future and success of a key employment area within the Borough.

Employment Generation

- 6.6 As set out within the Economic Benefits Statement **(E.1)** submitted with the Application, the existing occupied floorspace, if fully operational, could support c.1,160 FTE jobs on-site. However, based on the buildings' aging condition and taking into consideration Agent's advice, this is not considered a sustainable proposition without intervention. Instead, the more likely reality of the situation is that of a downward trajectory in occupancy terms with on-site employment numbers expected to fall in parallel.
- 6.7 The Proposed Development offers a much more stable, long-term proposition which has potential to support between 837 and 1,793 gross FTE on-site jobs (dependant on end occupiers). The lower end of the range is attributed to B8 floorspace, and whilst flexibility over use is sought across the Site, it is unlikely that new floorspace will come forward solely in B8 use. The level of estimated on-site employment could additionally support between 1,088 and 2,332 gross indirect jobs.
- 6.8 There will also be additional jobs created during the construction phase (expected to span a 10-year period). Direct construction jobs are estimated at 120 jobs per month over the construction period. This in turn has potential to support a further 117 indirect jobs.

Economic Output (GVA)

- 6.9 The level of employment estimated to be supported by the Proposed Development will generate significant GVA, as summarised below.
- Direct employment: £44.0m - £133.7m per annum
 - Indirect employment: £57.4m - £123.0 per annum
 - Direct Construction: £62.8m over the construction period
 - Indirect Construction: £61.0m over the construction period

High Quality and Sustainable Design

- 6.10 The Proposed Development offers the potential to replace the existing tired and inefficient buildings with a high-quality, modern and attractive employment floorspace which is better suited to current occupier standards and requirements. Not only would this help to create the conditions in which businesses can invest,

expand and adapt (in line with the NPPF Paragraph 81), it also offers the potential to significantly reduce carbon emissions through the wholesale replacement of the existing highly dated and inefficient (gas heating) system with energy efficient, all electric heat pumps. This has the potential to reduce carbon emissions by c.80%.

- 6.11 Through the application of a site-wide Sustainability Strategy (as detailed in the supporting Sustainability and Energy Statement **(F.1)**) the Proposed Development will achieve the highest standards including BREEAM 'Excellent' and Wellbeing standards. This would exceed the requirements of adopted Policy CS14 (which require at least BREEAM 'Very Good') but fully accord with draft Policy E12. To emphasise the substantial improvement this would deliver, the existing buildings on the Site would achieve no higher than a 'Pass' under BREEAM's In Use assessment criteria.
- 6.12 Whilst details of Appearance, Scale and Layout are reserved for later approval, the DASPD **(C.1)** outlines the proposed approach to securing a high-quality and well-designed development. An Indicative Masterplan **(B.8)** has also been submitted as part of the Application which demonstrates how the Proposed Development could come forward in a manner which respects the Site's context and maximises opportunities for its successful integration with the surrounding area. This is reflected in the design principles set out within the DASPD **(C.1)** with which future reserved matters applications will be required to accord with.

Heritage Considerations

- 6.13 The heritage status of the existing buildings on the Site as 'non-designated' heritage assets means they are a material consideration for Planning Applications under Paragraph 203 of the NPPF and Local Plan Policy DM20. In accordance with the NPPF, a Heritage Statement **(N.1)** has been prepared and submitted with the Application which establishes the heritage significance of the buildings and assesses the potential impacts upon that significance.
- 6.14 On the basis that the existing buildings are proposed to be entirely demolished, it is accepted that this would result in the complete loss of the heritage asset and its significance. However, Paragraph 203 of the NPPF identifies the balance to be taken with regards to the significance of the asset, in this case, a non-designated asset of only local interest.

- 6.15 Whilst the loss of the non-designated heritage asset may be unfortunate, the positive determination of this Application would not contravene or contradict any relevant planning policies and it is for the discretion of the decision maker to undertake a balance in relation to the scale of the loss and significance of the asset set against the aspirations of local planning policy.
- 6.16 The heritage impact clearly falls to be considered against the wider planning and economic circumstances of the proposals. This should be taken in context with the needs of the Site to deliver the wider aspirations of the emerging Havant Borough Local Plan in delivering key employment and business space for the next plan period. The proposals being brought forward are intended to provide high-quality, purpose-built and sustainable employment space befitting the next chapter in the Site's history. This will safeguard the future success of the Park by attracting new occupiers to the Park which will, in turn, protect and generate employment within the Borough by providing space that meets occupiers' aspirations and requirements (including sustainability credentials). This is a role which the existing buildings, despite their localised heritage value, are unfortunately no longer able to fulfil.
- 6.17 The emerging Local Plan identifies the site as comprising a key project and its comprehensive redevelopment is supported under draft Policy KP6. The Proposed Development forms part of a wholesale regeneration and investment strategy at the Park to realise future use and growth. Clearly, these represent important public benefits as identified by the Council and are considered to outweigh the loss of the existing buildings and their heritage value.

Highway Matters

- 6.18 The Transport Assessment (**D.1**) submitted in support of the Proposed Development establishes that the Site is spatially well located to encourage people travelling to and from the Site to make journeys by sustainable modes. The Proposed Development therefore presents an opportunity to provide new employment floorspace in a location that offers a genuine choice of transport modes and therefore offers reasonable potential to reduce reliance upon the private car.

Traffic Generation and Impact

- 6.19 The Transport Assessment demonstrates that the Proposed Development would result in a similar volume of vehicle movements as the existing Site (with the

original Phase 1 Permission) which was found to be acceptable to the Local Highways Authority in the determination of that application (Ref: APP/19/00703).

- 6.20 Compared to the existing site (assuming full occupancy), the Proposed Development would be expected to result in relatively small changes in traffic generation with a reduction in trips forecast in the PM peak. It is also relevant to note that the assessment has been undertaken based on Class E(g)(ii) trip rates⁷ which are more onerous in terms of traffic generation than Class E(g)(iii), B2 and B8 uses. The actual traffic generation is therefore likely to be lower. On this basis, the proposals are considered to accord with the objectives of Local Plan Policy CS20. A Travel Plan **(D.2)** would also be actively implemented and managed to assist staff in taking full advantage of non-car modes of travel to the Site.

Access Arrangements and Restrictions

- 6.21 Access to the Site is currently taken from Langstone Road to the east and Brookside Road, leading to Harts Farm Way to the west. These roads were designed to a good standard to serve the existing Park and already cater safely for large and articulated vehicles. The Proposed Development will utilise these same access points.
- 6.22 The Phase 1 Permission (Ref: APP/21/00405) includes a condition (Condition 17) which restricts access to the Site from Langstone Road during the hours of 07:30 and 09:00. A separate condition (Condition 18) requires improved signage to direct HGV movements in order to minimise the risk of u-turning vehicles in the junction of Langbrook Close. These provisions are to remain in place as part of the Proposed Development.
- 6.23 In order to manage access into the Site, existing barriers will be retained to the north and south of the Brookside Road entrance roundabout with a new barrier to be introduced to the Langstone Road access to the west of the existing bridge. The barriers will be equipped with an ANPR system that will be used to manage access to, from and through the Site. The use of an ANPR system to manage access to the car park also provides the flexibility to align car park space availability with completion of units during the phased construction of the Proposed Development.

Pedestrian and Cycle Access

⁷ With the exception of 3,000 sqm which has been assessed on the basis of Class E(g)(i) office use.

- 6.24 Within the Site, a network of footways and cycle routes will be provided and identified in order to deliver safe access and movement for these modes (as shown on Drawing Ref: 11392-PL002 **(B.2)**). It is also proposed that enhancements are made adjacent to the existing public right of way (51) including the provision of a 3m wide surfaced shared footway / cycleway. Cyclists will also be permitted to cycle along the private access road to reach Langstone Road. This will fill the current gap in the existing cycle network and benefit both users of the Site and the wider public.

Parking Strategy

- 6.25 In accordance with the Council's Parking Standards SPD (2016), car parking will generally be provided at a level of 1 space per 45 sqm of gross floor area for the employment uses. A limited area of employment floor space which is designed solely for use for B8 purposes will have car parking provided at 1 space per 90 sqm of gross floor area and 3,000 sqm GEA will have car parking provided at a space of 1 per 30 sqm. Electric car charging (EVC) will be provided at a rate of 10% and a further 20% (as a minimum) will be passive equipment to support further electric charging provision in the future.
- 6.26 HGV parking will be provided adjacent to loading bays. These will be spaced to allow additional HGV parking between them as necessary.
- 6.27 Cycle parking spaces will be provided in accordance with HBC parking standards having regard to the activities of the occupier of each unit within the Proposed Development. Spaces will be located in lit areas where they can benefit from natural surveillance and provided in covered shelters. Details of the location and design of cycle parking provision will be provided as part of future reserved matters applications.
- 6.28 Recognising that the Site is likely to be developed in phases, an indicative parking phasing plan is included in the Transport Assessment **(D.1)** (Section 4.20), which provides an indication as to how parking levels will be managed across the Site to maintain sufficient provision at any one time and limit the potential for overspill onto surrounding roads. The details of parking provision for each phase of development could be secured by Condition (similar to the approach adopted on the Phase 1 Permission).

Air Quality

- 6.29 An Air Quality Assessment (AQA) **(J.1)** has been submitted in support of the Proposed Development. This explains that the Site is not located within an AQMA and that local pollutant monitoring data suggests that pollutant concentrations in the local area are generally good. However, in accordance with draft Policy KP6, an AQA has been undertaken to assess the potential impacts of the construction phase of the Proposed Development and potential operational impacts linked to traffic generation.
- 6.30 Whilst the construction phase is expected to give rise to emissions which could cause dust soiling effects on adjacent uses, these effects can be reduced to a negligible extent through the implementation of appropriate mitigation measures (detailed in Appendix C of the AQA) which can be secured by Condition.
- 6.31 The operation of the Proposed Development is not expected to introduce new, sensitive receptors into an area of existing poor air quality, nor is it anticipated to significantly impact on local air quality. This is on the basis of a commitment to implementing a range of air quality mitigation measures including a Travel Plan, the provision of secure cycle storage spaces, electric vehicle charging units and Air Source Heat Pumps for heating and hot water generation; amongst other measures.
- 6.32 The Proposed Development is therefore expected to comply with all relevant local and national air quality policy.

Amenity Considerations

- 6.33 In accordance with Local Plan Policies DM10 and DM18 the Proposed Development has sought to minimise the potential for negative effects on the amenity of future occupiers and neighbouring occupiers in proximity to the Site.

Noise

- 6.34 The Application is accompanied by a Noise Assessment **(L.1)** which demonstrates that the predicted rating level from the night-time scenario results in a noise rating level that is at, or below the representative background sound level at nearby residential locations for the period. Therefore, the potential noise impact is

considered to be suitably low and in accordance with guidelines previously used by Havant Borough Council.

- 6.35 In the daytime scenario the predicted noise rating level results in a potentially adverse impact. However, readily available noise control measures are set out (in Section 9) which demonstrate that any adverse impacts can be effectively mitigated to ensure low noise impact for noise sensitive receptors in the vicinity. Such measures include the closing of loading bay doors and external sound wall insulation, both of which are capable of being secured by Condition if deemed necessary.

Odour

- 6.36 An Odour Statement **(K.1)** has also been submitted which indicates that at worst, the Proposed Development may present a slight adverse impact on local sensitive receptors. This is based on an assumption that a medium sized odour source might locate in new buildings located on the eastern boundary (i.e. in closest proximity to residential dwellings on Brookmead Way).
- 6.37 However, there are potential mitigation measure which could be implemented to minimise the residual risk (including those detailed within the DASDPD). With a strategy for appropriate mitigation, the proposals will not therefore lead to any significant negative effects on amenity.

Lighting

- 6.38 The DASPD **(C.1)** provides an outline Lighting Strategy for future reserved matters applications to adhere to. This includes measures to protect neighbouring residential uses from potential light pollution within the Site.

Construction Management

- 6.39 The DASPD **(C.1)** also commits to the preparation of a Construction Management Plan for each phase of development, to be agreed with HBC prior to the commencement of each phase. This can be secured by Condition and will ensure that the amenity of neighbouring residents is protected during construction.

Flood Risk/Drainage

- 6.40 A combined Flood Risk Assessment and Drainage Strategy **(G.1)** has been prepared and submitted as part of the Application. This confirms that the Site is largely located within Flood Zone 1. Whilst the eastern boundary of the Site, along the Mill Stream, is identified as being potentially prone to flooding (and within Flood Zone 3), raised earthworks exist between the nearest Development Plot (Plot B) which offers protection from flooding. The proposed development is classed as less vulnerable usage and it is located in Flood Zone 1 which meets the sequential test. An exception test is not required.
- 6.41 Surface water will be designed to cater for storm events up to 1 in 100 year plus 40% climate change. To ensure that the development will discharge surface water at the proposed rates, a vortex flow control unit (Hydrobrake) will be used for each area to limit flows leaving the development. This is consistent with approved strategy for Phase 1.
- 6.42 In accordance with the NPPF and Local Plan Policy CS15 the use of SuDS features are incorporated within the indicative drainage strategy. It is proposed that surface water discharge will be attenuated via a combination of permeable car park bays and cellular storage. The use of oil interceptors are also proposed, to ensure that the water quality will be raised prior to being discharged off site.
- 6.43 A full drainage strategy (underpinned by detailed drainage modelling) will be submitted in support of future reserved matters applications and this can be secured by Condition.

Trees / Landscaping

- 6.44 The outline proposals seek to deliver a high-quality design set with a generous landscape setting as illustrated on the Landscape Framework Strategy (Drawing Ref: 11392-PL006), with the core principles explained within the DASPD. Overall, this seeks to build on the Site's existing landscape character and commits to delivering a significant overall enhancement in terms of the quantum of trees and planting across the Site. New external amenity areas are also proposed as part of the Landscape Strategy which is consistent with the objectives of Local Plan Policy CS13

- 6.45 The Application is supported by an Arboricultural Impact Assessment **(H.1)** which identifies the removal of 60 trees and 9 tree groups, albeit 23 of these trees (and 2 tree groups) have already been approved for removal as part of the Phase 1 Permission (Ref: APP/21/00405). There are also three trees (T83, T84 and T87) which are identified for removal on the basis that they are considered unsustainable and not as a direct result of the Proposed Development.
- 6.46 There is a single tree of significance, the silver maple (T46) which is proposed for removal. Whilst this would result in some loss of amenity value, the AIA notes that as new tree planting matures, the loss can be adequately mitigated.

Ecology

- 6.47 In accordance with Local Plan Policies CS11 and DM8, the Application is supported by a Preliminary Ecological Appraisal (PEA) **(I.1)** which confirms that the Site is not subject to any statutory or non-statutory designations.
- 6.48 It is noted that whilst there are habitats of value within the Site, due to the extent of the Proposed Development and the retained woodland and grassland, it is considered that any potential populations of badger, dormice, water voles, otters, stag beetles and hedgehogs will not be affected. A precautionary approach to site clearance in respect to breeding birds and reptiles is recommended, in order to minimise any potential adverse impacts on this species group. This can be secured by Condition.
- 6.49 The PEA identifies a range of ecological enhancement measures which will be incorporated as part of the detailed design for each phase including bird and bat boxes; the installation of wildlife friendly pathways; and compensatory planting. These measures can be secured by way of Condition.
- 6.50 In accordance with Policy DM8 and draft Policy E14, a detailed Biodiversity Net Gain (BNG) calculation⁸ **(I.2)** has been undertaken which demonstrates the potential to deliver the following net gains in biodiversity across the Site
- 0.22% net gain of habitat areas; and
 - 100% net gain of terrestrial linear features.

⁸ Using the Biodiversity Metric 3.0 published by Natural England.

- 6.51 In respect of aquatic linear features, the BNG shows a neutral impact (i.e. no loss but also no gain). The calculation excludes potential increases in fauna which would be supported by proposed enhancement measures detailed above and so overall, the proposals will deliver a positive benefit in ecological terms.
- 6.52 There is a commitment to delivering net gain in biodiversity across the Site and the Post Development Landscape Plan included within Appendix B of the BNG Report shows one way that this may be achieved based on the indicative Masterplan layout.
- 6.53 However, it is envisaged that each phase will need to demonstrate how it will contribute to the overall delivery of net gain across the Site, based on the detailed design of that phase. Each phase will need to be considered and assessed cumulatively in terms of its contribution to net gain across the Site as a whole.

Contamination

- 6.54 In accordance with Local Plan Policy DM17, the proposals are supported by a Land Quality Assessment (LQA) **(M.1)** which provides a summary of the existing ground conditions across the Site, drawing on detailed site investigation analysis undertaken in support of the Phase 1 Permission. This confirms that as development plots proceed to the detailed stage individual, site specific, investigations will be undertaken to ascertain building specific design parameters, identify any previously unidentified contamination and / or areas of the site previously inaccessible due to the position of existing buildings. Such investigations can be secured by way of Condition.

S106 Requirements

- 6.55 It is anticipated that at the very least a S106 will be required to include a mechanism which secures the same S106 items linked to the Phase 1 Permission (S106 Agreement dated 22 July 2020) which are relied upon by the Proposed Development. This will ensure delivery in the (unlikely) event that the Phase 1 Permission is not progressed. This approach has been discussed and agreed with Hampshire County Council as Highways Authority.

Assessment Summary

- 6.56 Based on the above Planning Assessment, the Proposed Development is considered to accord with the Development Plan and the NPPF.
- 6.57 The Proposed Development will deliver significant economic (and associated social) benefits through the revitalisation of a key employment site in a way which will maximise its potential and ensure its long-term future to the direct benefit of the Borough and its population.
- 6.58 It will also deliver significant environmental benefits, most notably through the replacement of the existing, dated systems on Site with highly sustainable alternatives which has potential to reduce carbon emissions by c.80%. This would be transformative in terms of the Site's future carbon emissions and is therefore a significant public benefit which should weight in favour of the proposals. There will also be an overall enhancement in ecological terms compared to the Site as existing.

7.0 SUMMARY AND CONCLUSIONS

- 7.1 This Planning Statement has been prepared by Barton Willmore on behalf of XLB Property Ltd, to assess the planning matters arising from an Application for Outline Planning Permission for the comprehensive redevelopment of Langstone Park.
- 7.2 The Application proposes an employment-led scheme comprising up to 52,000 sqm GEA new employment floorspace and supporting infrastructure. Taken together with Phase 1, this would equate to a total of 63,290 sqm GEA floorspace across the Langstone Park Site as a whole. The Proposed Development (alongside Phase 1) seeks to secure the comprehensive regeneration of a key employment area which will substantially enhance its economic contribution and environmental performance to the direct benefit of the Borough and its population.
- 7.3 Whilst the Site is not currently subject to any site-specific policies or allocations under the adopted Development Plan, it is clearly recognised in the emerging Local Plan as a key employment area which requires intervention. Notwithstanding the limited weight to be attributed to the emerging Local Plan (and irrespective of the outcome of on-going discussions with the Inspectorate), the current (and acknowledged) issues facing Langstone Park will not change. It therefore remains that without appropriate intervention, as advocated by draft Policy KP6, a continual decline in occupancy levels on the Site. The Proposed Development will deliver on the aspirations of the emerging Local Plan and safeguard the long-term, sustainable future of the Site, befitting of its status as a key employment area.
- 7.4 The Proposed Development has been the subject of extensive pre-application discussions with senior officers at HBC (via a Planning Performance Agreement), key stakeholders and the local community. Statutory consultees such as Hampshire County Council and National Highways have also been extensively engaged and the views of the public have also been sought via an online public consultation event. Through these discussions, the Proposed Development has been finalised where appropriate to meet a wide variety of diverse objectives and interests.
- 7.5 This Planning Statement and accompanying technical reports have demonstrated the Proposed Development's compliance with Development Plan policy and other material considerations.

- 7.6 It has been demonstrated that the Proposed Development fully accords with the Council's emerging strategy for the Site which will ensure its long-term and sustainable contribution to the local economy. Overall the Proposed Development has potential to support between 837 and 1,793 gross FTE on-site jobs (dependant on end occupiers), which could support between 1,088 and 2,332 gross indirect jobs (in addition to jobs created during phases of construction estimated at 120 direct jobs and 117 indirect jobs). This would generate a direct GVA of between £44.0m and £133.7m and an indirect GVA of between £57.4m and £123.0m. When compared to the downward trajectory of outputs associated with the Site in its current condition, this is considered to be a significant benefit of the scheme.
- 7.7 The proposed comprehensive redevelopment of the Site also provides a unique opportunity to deliver a wholesale replacement of the existing, dated centralised heating system with energy efficient, all electric heat pumps. This has the potential to reduce carbon emissions by c.80%. Alongside this, a variety of other interrelated measures are proposed as part of the site-wide sustainability strategy which seeks to optimise the Site's performance in sustainability terms. Again, when compared to the Site's current performance, this will be transformative and is considered a significant public benefit.
- 7.8 In combination, the significant benefits associated with the comprehensive redevelopment of the Site (which could not be realised through re-furnishment) are considered to outweigh the loss of the existing buildings and their heritage value. There is therefore not considered to be any conflict with the Development Plan or NPPF in this respect.
- 7.9 The accompanying technical reports demonstrate that the Proposed Development will not bring about any significant adverse impacts. Where potential impacts are identified, appropriate mitigation and/or enhancement measures are proposed. The potential for any highways impacts is also capable of being controlled through the use of appropriately worded conditions to control access into the Site off Langstone Road and to ensure a suitable level of parking is provided during the phase redevelopment of the Site and upon completion, alongside measures to encourage the use of more sustainable modes of travel.
- 7.10 Against this backdrop of compliance with compliance with the Development Plan, National Guidance and other material considerations, we conclude that in the

absence of harm and considering the significant tangible benefits arising from the proposal, the Application should be granted Planning Permission.

APPENDIX 1
SITE LOCATION PLAN

APPENDIX 2

INDICATIVE MASTERPLAN