

Sequential Test Analysis – Proposed Lidl Foodstore, Havant

Site 1:	Units 4 and 5, Solent Retail Park, Havant	
Sequential Status	In-Centre (Havant)/Primary Frontage (Policy AL3.3).	 
Current Use(s)	Vacant purpose-built retail units (formally occupied by Next and Laura Ashley).	
Relevant Planning History	Outline application (Ref. 04/68908/001) for the construction of 5,640m² of retail warehousing and 2,305m² for flexible employment within Classes B1(c) (Light Industry), B2 (General Industry) and B8 (Warehousing), together with means of access including a footpath/cycle way link to Park Road South, which included demolition of residential properties and other industrial premises was permitted in December 2004. Following the approval of details, reserved by condition, of that planning permission, this resulted in the creation of the eastern part of Solent Retail Park (Units 1 to 7) and the linking of Solent Road and Brockhampton Lane by the construction of Selbourne Road. Condition 15 of the 2004 permission defines the quantum of retail floorspace within the approved development as 5,640m². That floorspace limit was raised to 9,200m² by planning permission Ref. 06/68902/012 dated 30th May 2006, granted following an application under s73 of the 1990 Act. A subsequent s73 permission (Ref. 08/68908/020) dated 1st May 2008, removed any limitation on the amount of floorspace that could be used for the sale of 'non-bulky goods (including food)' as defined in Condition 13 of the 2004 permission and Condition 1 of the 2006 permission. More recently, an application to remove Condition no. 14 of planning permission 04/68908/001 to allow for separate, or self-contained, units to be created by division or sub-division of the floorspace (Ref. APP/20/00637) was approved by the LPA. Part of the justification for this application focused on making the floorspace more attractive to the retail market with the Officer's report commenting as follows: <i>"...the proposal to remove the minimum floorspace limit (650m²) would allow for more flexible marketing and would encourage retailers requiring a smaller floorspace the opportunity to consider the Solent Retail Park units."</i> That being the case there is an enhanced prospect of maintaining or improving occupancy levels at the site and, consequently, enhancing the viability and vitality of Havant Town Centre. A further application (Ref. APP/20/00688) sought consent to remove Condition no. 3 of planning permission (06/68968/012) relating to floorspace use. Condition no. 3 limits the amount of floorspace that may be devoted to food sales to no more than 470m². Removal of this condition was based on increasing the attractiveness of the accommodation to food retail occupiers. The application was refused on 23rd April 2021 for a single Reason for Refusal: <i>"On the basis of the information available, it has not been demonstrated that the proposed development for the provision of food retail can be accommodated without having a severe impact on the operation of the local highway network. In addition, on the basis of the information available, there are concerns that the under provision of car parking spaces is likely to result in additional vehicular movements, adding to congestion on the local road network."</i>	

Relevant Planning History cont.

In relation to car parking, the Officer's Report commented as follows:

"Car parking has been considered against Havant Borough Council Parking SPD July 2016 (Partially Updated September 2019). The submitted Transport Assessment confirms that on site provision within car park Phase 1 is 43% of the SPD requirement and 55% in Phase 2 car park. This shortfall below the parking standards would be exacerbated by the higher parking standards required for food retail."

It continues:

"Whilst it is appreciated that the site is located within a highly sustainable location and with other public parking available (for example on the other side of Park Road South in Bulbeck Road), it is questionable whether customers picking up food retail would be conveniently served by this provision).

The Highway Authority confirm that the level of parking available within Solent Retail Park is below the minimum standards set out in Havant's SPD. The potential for a food retail occupier utilising the vacant units would increase the parking requirement for the site above and beyond the existing use."

This is consistent with our own observations on site with regards to the operation and capacity of the shared customer car park.

The western part of the retail park, occupied by Marks & Spencer and Next, was constructed pursuant to a separate planning permission (Ref. APP/12/00852), dated 20th June 2013.

Planning Policy

The vacant units fall within the eastern part of Solent Retail Park which, together with the western portion of the west of Selbourne Road, form part of Havant Town Centre as defined in the Havant Borough Local Plan (Allocations) 2014.

Since the adoption of the Havant Borough Local Plan (Allocations) in 2014, the whole of Solent Retail Park falls within the Town Centre boundary with units 1-7 designated in the adopted Local Plan as 'Primary Frontage'.

Assessment

The two vacant units available on Solent Retail Park total in the region of 16,917ft² (9,613ft²/7,304ft²). Collectively, the units total c. 1,571m² (including all back of house space). The GIA of the application proposal is c.1,899m². Even allowing for flexibility the combined units are of insufficient size to accommodate the application proposals, or a flexible form of them. The units would likely necessitate provision of additional mezzanine floors which would hinder the efficient stock handling procedures of the operator. Spreading the proposal across multiple floors would not be acceptable to the retailer and would also exacerbate concerns with regards to the under provision of customer car parking. The servicing arrangements are also inferior at this location and unable to accommodate a dedicated loading bay, for example.

Even if the floor plate and servicing arrangements met with Lidl's operator requirements (they do not), these units do not benefit from sufficient customer car parking for food retail purposes. Rather, existing parking on this part of Solent Retail Park (c. 200 spaces) is shared across 7 individual units. As set out in Havant Parking SPD, the car parking requirements for A1 non-food and A1 food use are 1 space per 20m² and 1 space per 14m² respectively. The level of parking available at Solent Retail Park is c. 49% of the minimum standards, as prescribed within the SPD. These vacant units would not be acceptable to the operator given the clear under provision of car parking.

Sufficient customer car parking is a prerequisite for discount food retailing. The existing adjacent surface car park is chargeable, shared with adjacent occupiers and the town centre and has been observed to be operating at, or near to, capacity. Such concerns have been raised during the determination of planning application APP/20/00688, by the Highways Authority, which led to that application being refused. Furthermore, the Highway Authority indicated, during the assessment of planning application Ref. APP/20/00688, that the inclusion of any mezzanine floorspace would be resisted, owing to concerns regarding car park capacity. The application proposals provide in the region of 130 car parking spaces – 65% of the total car parking available on this part of Solent Retail Park (shared across 7 units). It is a location that is grossly under provided for in terms of car parking, which would not be acceptable to food retailers.

Assessment cont.

As a result, the site is unsuitable in sequential test terms for both the development, or a suitably flexible form of it. The clear under provision of car parking would place Lidl at a critical trading disadvantage when compared to their main competitors within the catchment and would represent a significant compromise when compared to application proposals. Available units at Solent Retail Park are categorically not suitable from a car parking perspective and are also of insufficient size, even when allowing for flexibility.

For these reasons, the site is not suitable for sequential test purposes and has been discounted on this basis.

Site 2:	44-54 West Street, Havant	
Sequential Status	In-Centre (Havant)/Primary Shopping Frontage.	 
Current Use(s)	Redeveloped Town Centre Site.	
Relevant Planning History	Site was formerly a two-storey 1960's building with ground floor retail units and residential above. Planning approval (Ref. APP/10/00992) was awarded in February 2011 for the demolition of existing shops and flats and construction of a mixed use building providing in the region of 650m ² of retail (Class A1) and 14no. 2-bed flats. That permission has been implemented and subject to a variation application (Ref. APP/17/01358 and APP/19/01260).	
Planning Policy	Site forms part of primary shopping frontage whilst part of the site falls within Flood Zone 3.	
Assessment	The site is unavailable for sequential test purposes, with works progressing on site in relation to the previous mixed-use proposal. Furthermore, the retail element of the scheme delivers just 650m² of A1 retail floorspace (arranged in 2no. units). It is, of an insufficient size to accommodate the application proposals, or a flexible form of them. The site is both unavailable and unsuitable for sequential test purposes.	

Site 3:	East Street, Havant Town Centre	
Sequential Status	In-Centre/Part of Primary Shopping Frontage.	 
Current Use(s)	Mixed use.	
Relevant Planning History	Various planning history associated with individual buildings including change of use applications, listed building consent, conversion of upper floors to residential purposes, demolition of existing buildings and erection of apartment led schemes, etc.	
Planning Policy	This wider site is identified as a regeneration area situated in the eastern part of Havant Town Centre. It includes a range of buildings and land from 10 North Street southwards towards the White Hart Public House at 1 East Street, then eastwards from 3-17 East Street, 2-12 The Pallant, St Faith’s Church House and Church Hall and the car parks at East Pallant and the Bear Hotel. Within the existing Allocations Plan (2014), the site is identified as a mixed use allocation under Policy HB3 (Havant and Bedhampton Mixed Use Allocations). The site (Ref. H22) is acknowledged as having a total site area of c.0.93 hectares with proposed uses including housing (40 dwellings), community uses, alongside main town centre uses. Policy H22 identifies a number of known constraints associated with the site including several listed buildings, St Faith’s Conservation Area, moderate potential for archaeological deposits, ground quality issues and potential residential amenity concerns.	
Assessment	The area around St Faith’s Church, now a Conservation Area, marks the historic core of Havant Town Centre. It is characterised by many small, local and independent businesses. As has become clear through a review of the planning history, many premises have been, or are in the process of, being converted to residential use. This shift appears to have taken place organically following a relaxation of planning policy. Indeed, the Authority have concluded, through a review of town centre boundaries (Havant and Waterlooville Retail and Town Centres Study – June 2016) that <i>“several units previously occupied by a mixed range of uses at the eastern end of East Street including shops and offices were converted into residential use between 2005 and 2015. As discussed in Section 10, this shift has taken place naturally following a decision to enable flexibility and opportunity in the market by removing the tertiary frontage in Policy TC8 of the 2005 Havant Borough District Wide Local Plan, when it was superseded by the Local Plan (Allocations) in 2014”</i>. Accordingly, it has been concluded that East Street no longer performs a town centre function and should be removed from the town centre boundary. It is, therefore, expected that the area will remain the focus of residential-led regeneration. In sequential terms, it cannot be said that this site is available. Any mobilisation of the site (for foodstore purposes) would necessitate a complicated land assembly process which would not be feasible for a standalone discount foodstore. Furthermore, many of the buildings remain in active use and/or benefit from recent planning permissions. Acquiring this major site for a single discount foodstore would not be viable and would give rise to several heritage concerns. The site is discounted from the sequential test assessment on the basis of both suitability and availability.	

Site 4:	Town End House, Havant	
Sequential Status	In-Centre.	
Current Use(s)	Offices, associated buildings, open space and car parking.	
Relevant Planning History	None.	
Planning Policy	Site is identified under Policy HB3 (Allocations Plan – 2004) (Havant and Bedhampton mixed use allocations) as a potential mixed use site (including housing and main town centre uses). The policy indicates a site area of 0.49 hectares and potential capacity for in the region of c.19 dwellings. In describing the site, Policy H72 remarks the following “<i>the site includes Town End House (vacated by Hampshire County Council and surplus to their use), associated buildings, open space and car parking</i>”. Mature vegetation lines the southern and eastern boundaries of the site and The Spring Arts Centre (former Town Hall) is located to the east. The land used as a public car park does not form part of the allocation. A number of known constraints are identified with the site including conservation area, potential for archaeological deposits and retention of, and no negative impact on, the protected open space. Furthermore, one of the site specific development requirements identified by Policy H72 is to utilise the existing access onto East Street.	
Assessment	In the first instance this site at c.0.49 hectares is too small to accommodate the application proposals, or a flexible form of them. It is a complicated site adjacent to public open space and town centre car parking, alongside The Spring Arts and Heritage Centre. It would not be able to deliver the required car parking and servicing and can, in no way, be considered suitable for food retail purposes. The shared access from East Street would also not meet the commercial operator requirements of Lidl. In addition, the site is in active use and unavailable for sequential test purposes.	

Site 5:	Post Office, Delivery Office, Havant, PO9 1QR	
Sequential Status	Edge-of-Centre (Havant).	 
Current Use(s)	Royal Mail Delivery Office.	
Relevant Planning History	None. Historic planning application (Ref. 92/54697/001) regarding alterations to main elevation appears the only planning record.	
Planning Policy	Site is not subject to any site-specific designation. The site was put forward through Council's Strategic Housing Land Availability Assessment (August 2020) Site Ref. HB39. However, it was discounted due to its availability. The site was also a former housing allocation. However, it was not taken forward into the current Allocation Plan (2014), as it was considered no longer available for development.	
Assessment	This site is too small to accommodate the application proposals, or a flexible form of them. Furthermore, the site remains in active use as a sorting office and is, therefore, unavailable (consistent with the conclusions reached through the Council's SHLAA – August 2020).	

Site 6:	Market Parade, Havant	
Sequential Status	In-Centre.	 
Current Use(s)	Mix of uses.	
Relevant Planning History	Outline planning application with all matters reserved for demolition of existing buildings and redevelopment of site to erect 130no. apartments and 1,126m ² of ground floor commercial/retail space (Use Classes A1-A5 and B1(a)) (indicative height of building between 5 and 13 stories) was approved in August 2016. However, the permission has since lapsed.	
Planning Policy	The Market Parade site is identified within Policy HB3 (Havant and Bedhampton Mixed Use Allocations) – Allocations Plan 2014, as a mixed use application (Site Ref. H10/BD30). The policy acknowledges the site to total c. 1.55 hectares and being suitable for a range of uses including housing (c. 200 dwellings, offices, 1,500m² alongside main town centre uses). The precise wording of the policy also identifies a number of constraints with the site including Flood Zone 3, St Faith's Conservation Area, whilst acknowledging that many of the commercial units remain in use. The site is considered a major development opportunity with Policy H10/BD30 advocating a coordinated approach to the delivery of the mixed use allocation, whilst recognising the potential to deliver transformational regeneration and a landmark building at an important gateway location to the town (adjacent to Havant Railway and Bus station). The emerging Local Plan (Pre-Submission) notes <i>“The Market Parade area will be the focus for the town centre’s regeneration concentrating on the provision of food, drink and smaller retail units at ground floor level and redevelopment for high-quality, high-density, innovative residential use on upper floors. As a key route to and from Havant Railway Station, public realm improvements are vital to enhance not only the appearance of Market Parade, but to create a welcoming entrance to Havant Town as a destination. Bringing Havant Park into the Market Parade area as a key feature of a new north-south link, and as a destination, will also significantly enhance the attractiveness of the area. As part of this, there is an opportunity to introduce a taller, landmark building in Market Parade overlooking Havant Park. The principle of high-quality, high-density living adjacent to the railway station was established through a planning permission in 2015 which, however, was not implemented”</i>.	
Assessment	Market Parade is identified as a comprehensive regeneration opportunity within both the existing and emerging Development Plan. Bringing forward the site of the form and type envisaged through planning policy, will require a complicated land assembly and coordinated approach to delivery. Many of the units remain in active use and there is no indication that the site is likely to be available within a reasonable period of time. It is also telling that, despite benefitting from a favourable planning history there appears, to date, little progress in terms of realising the expectations of the allocation. It would be entirely unreasonable to expect Lidl to bring this site forward for mixed use development. Only the provision of a single retail unit is within Lidl's remit. They are not capable of facilitating comprehensive development – and nor should they be expected to do so. For these reasons, the site is both unavailable and unsuitable for the application proposals, or a flexible form of them.	

Site 7:	Former Carphone Warehouse, 1 Park Way, Central Retail Park, PO9 1HH	
Sequential Status	In-Centre.	 
Current Use(s)	2no. adjacent retail units totalling c.200m ² .	
Relevant Planning History	None.	
Planning Policy	Site falls within defined town centre boundary for Havant.	
Assessment	The site is of insufficient size to accommodate the application proposals, or a flexible form of them and has been discounted from the sequential test assessment.	

Site 8:	Meridian Shopping Centre, Elm Lane, Havant	
Sequential Status	In-Centre/Primary Shopping Frontage (Ground Floor).	 
Current Use(s)	Purpose built in-centre shopping centre.	
Relevant Planning History	None	
Planning Policy	The Meridian Centre is a purpose built enclosed shopping centre (opened 1991) which includes decked parking above, first floor and an adjacent multi-storey car park in Bulbeck Road. The centre houses multiple and independent (mainly comparison) retailers, as well as a café. Havant library is located on the first floor. The Havant and Waterloo Retail and Town Centres Study (2016) notes the following with regards to the Meridian Shopping Centre <i>“The Meridian Centre’s occupancy has increased significantly in the last few years to the extent that the centre is now fully occupied at ground floor level, primarily by A1 uses (18 out of 20 units). Some of the businesses represented include WH Smith, Store Twenty One, Holland & Barratt, Wilkinsons, Argos, O2 and Costa Coffee. Four out of the 11 units on the first floor were, however, vacant at the time of the last survey in March 2015, two of which had been last occupied by comparison retail businesses (Sleepwell and Simpsons)”</i>. The Meridian Centre was taken over by Fairacre Asset Management in 2014. It is understood that there is an intention to undertake some physical enhancements to the building and seek a new mix of tenants. First floor occupancy remains a challenge and may warrant considering an alternative, non-retail approach. For example, a new leisure use such as a cinema or a gym, subject to a suitable and viable scheme coming forward.	
Assessment	Following a site visit it was observed that there were a number of vacant units located within the Meridian Shopping Centre, principally at first floor level. The largest of the vacant units equates to c.550m². Therefore, all available units within the Meridian Centre are, in the first instance, too small to accommodate the application proposals, or a flexible form of them. Furthermore, in commercial terms, it should also be noted that the upper floors of the Meridian Centre have proven unsuccessful in commercial terms for many years owing to poor levels of pedestrian footfall. The Council’s own policies recognise that alternative and more flexible uses of the upper units should be sought. The available units do not benefit from high levels of visual prominence, tucked away in a peripheral area of the town (first floor is not highlighted as either primary or secondary frontage) and would not be suitable for the named occupier. Furthermore, the lack of suitable surface level car parking and servicing arrangements would render the site unsuitable in sequential test terms. Owing to the above, units within the Meridian Centre have been discounted from the sequential test assessment for reasons of suitability.	

Site 9:	Portsmouth Water Headquarters, Havant, West	
Sequential Status	Edge-of-Centre.	 
Current Use(s)	Office Headquarters (Portsmouth Water).	
Relevant Planning History	None.	
Planning Policy	Site is identified for residential development with the Allocations Plan (2014) (Policy HB1 Site Ref. H:14). The policy considers the site as having the potential for c.120 residential units. The respective site proforma notes that Portsmouth Water Company intend to relocate their offices to an alternative location. A number of constraints are identified for their site including TPO's, Brockhampton Conservation Area, listed building and Buildings of Local Interest. The site is also identified in the Pre-Submission Havant Borough Local Plan (Policy H17), as a residential allocation, with potential to accommodate c.135 dwellings.	
Assessment	This site currently remains in active use for an office headquarters development and is, therefore, unavailable in the first instance. The site is also a longstanding residential allocation which is expected to come forward as part of a masterplanned approach. The emerging policy does not include any provision for retail purposes. We are aware that the site is being promoted for residential purposes consistent with the existing and emerging Development Plan and, therefore, a retail proposal would be contrary to adopted policy and future aspirations for the site. Accordingly, the site is both unavailable and unsuitable for sequential test purposes and has, therefore, been discounted from the assessment.	

Site 10:	Unit 1, Dukes Walk, Waterlooville, PO7 7HS (Former Waitrose Unit)	
Sequential Status	In-Centre/Primary Shopping Frontage.	
Current Use(s)	Vacant (former Waitrose leasehold foodstore).	
Relevant Planning History	Various planning records associated with the site including, most recently, planning application Ref. APP/14/00235 which sought a variation of Condition no. 1 of planning permission 00/53856/008 to allow deliveries between 06:00 – 22:00 Monday to Saturday and 08:00 – 20:00 on Sundays. That application was allowed in May 2014. The former Waitrose was originally approved under planning application Ref. 98/53856/003, which permitted demolition of no. 29 Stakes Hill Road, nos. 3, 5 and 7 Spur Road and the Tavern Public House and construction of 15no. food and non-food retail outlets (9,684m ²), first floor leisure use and c. 250car parking spaces.	 
Planning Policy	This sequential test site is not subject to any site-specific planning policy designations – other than falling within Waterlooville Town Centre as defined by Policies CS4 and AL3 of the adopted Local Plan. These policies seek to promote main town centre uses including A1 retail shops to protect and enhance the vitality and viability of the town centre. Emerging planning policy confirms Dukes Walk as one of the primary shopping areas in the centre.	
Assessment	Unit 1A, Dukes Walk is a large purpose-built retail unit that was previously occupied by Waitrose. It is located at the corner of Dukes Walk and Stakes Hill Road and forms part of the Dukes Walk Shopping Parade – a relatively modern retail complex located within Waterlooville Town Centre. This includes a shared car park accessed from either Curzon Road or Stakes Hill Road. The former Waitrose unit has a service yard, located to the south-east of the store which takes access from the car park access road closest to the Stakes Hill Road entrance. It is our understanding that Waitrose vacated the unit in the summer of 2020. However, the unit does not appear to be in the process of active marketing. Indeed, from our own on-site observations, fixtures and fittings associated with the former Waitrose occupation/use appeared in situ. Dukes Walk Shopping Centre consists of a terrace of 11 retail units, alongside the former Waitrose and Wilkinsons. These two large units, in effect, anchor the shopping centre either side of the smaller retail terrace. All units, some of which are themselves vacant, overlook the shared surface level car park. Having utilised Promap data, an estimate of the gross areas of the units, forming part of the Dukes Walk development, are as follows: ▪ Former Waitrose – c.2,800m². ▪ Wilkinson's – c.1,600m². ▪ Units 1 – 11 (Dukes Walk) – c.2,195m². It should also be noted these estimations relate to ground floor gross areas only (as measured from Promap) and do not include first floor uses such as, for example, the Pure Gym (above the Wilkinson's). The former Waitrose unit totals c.30,000ft² (gross area/2,800m²). However, this is just the ground floor sales area. It does not include various back of house areas at both lower ground and first floor levels. Therefore, when viewed in isolation, the ground floor of the former Waitrose is c. 125% larger than the sales area proposed for the application proposals (c.1256m²) and c.50% larger, than the entire gross area for the application proposals, when incorporating back of house accommodation (1899m²). Even when allowing for appropriate flexibility, in respect of format and scale, there can be no credible assertion that the former Waitrose unit is suitable for the broad type of development which is proposed. It is a store that has, clearly, not been designed for discount food retailing. Alongside the excessive size of the unit, when compared to the application proposals, its configuration also means it is unsuitable for the application proposals, or	

Assessment cont.

a flexible form of them. It is of an irregular footprint with excessive ancillary and back of house accommodation arranged over multiple levels. The former Waitrose takes the form of an anchor destination store, rather than a modest neighbourhood store as proposed. Put simply, the Waitrose unit is far too large for Lidl to take occupation and far surpasses their identified 'need' for the catchment.

In considering the suitability of the Waitrose store, for sequential test purposes, we have visited the site and studied available store layout plans. In addition to the unsuitability of the unit from a sales area perspective, it is also notable that the unit takes the form of a multi-level store. Importantly, having regard to the Lidl operation, the service yard is at a lower ground floor level, along with the main warehouse and back of house spaces. Additional accommodation (including staff welfare/ancillary facilities and offices) is provided at first floor level. From an operational perspective, the servicing and delivery arrangements of the unit would not be acceptable to the retailer. As articulated throughout the submission, Lidl require level access from back of house accommodation direct to the sales floor. This is a prerequisite to allow for their efficient stock handling procedures, including the moving of palletted goods. The former Waitrose unit, arranged over several levels, does not provide for level access for deliveries. Therefore, alongside the size of the unit, its configuration also renders it unsuitable for the application proposals, or a suitably flexible form of them. It is of an irregular shape with multiple columns across the sales floor, prohibiting the efficient display of goods and merchandising.

Delivering the LAD business model has implications for the design and layout of Lidl's stores. A critical component of which is the size and configuration of a store which is capable of supporting Lidl's stock handling procedures and the ability to stock its standard product lines in sufficient depth (to both minimise servicing costs and maintain product availability for customers). The restriction that this places on the ability of Lidl to be 'flexible' in its format is, therefore, relevant to the application of the sequential test. Indeed, this has been accepted by the SoS and Inspectors through various appeal decisions. In short, there are inherent characteristics of the LAD business model that limit the scope for flexibility. Such characteristics have been identified as (1) a store of a size that may accommodate all functions that form the business model, (2) the need for a high proportion of sales relative to storage space, (3) a need to enable efficient movement of palletted goods and (4) the fact that Lidl concentrate on selling a limited range of primarily convenience goods. The former Waitrose unit falls on a number of these fundamental operating requirements.

Furthermore, the reliance upon a shared pay and display car park would not be acceptable to Lidl, from a commercial operation perspective. As set out in Havant Parking SPD, the car parking requirements for A1 non-food and A1 food use are 1 space per 20m² and 1 space per 14m² respectively. On this basis, the sales area of the former Waitrose Unit alone would generate a parking requirement in the region of 200 car parking spaces. In comparison, the Wilkinsons and Units 1 – 11 Dukes Walk (inclusive) would generate an additional requirement of 190 car parking spaces. On this basis, the total level of car parking available at Dukes Walk (251) is c.64% of the minimum parking spaces, as prescribed within the SPD. Available car parking at Dukes Walk is likely to be less than this, when taking into consideration the individual parking requirements of other uses including the Pure Gym, Public Library and Waterlooville town centre generally.

Access to sufficient customer car parking is a prerequisite for discount food retailing purposes. They require ample surface level car parking adjacent to the store and for which they retain absolute control. A chargeable car park which has limited capacity would place Lidl at a significant trading disadvantage when compared to their competitors.

In addition to the fundamental operational deficiencies with the former Waitrose unit for discount food retail, it is also important to note that this location has already failed in commercial food retail terms with Waitrose having taken the corporate decision to cease trading from the location. In part, this may be afforded to the peripheral location of the unit which faces away from the centre and which does not appear to benefit from strong pedestrian flows.

Accordingly, the former Waitrose Unit is considered unsuitable for sequential test purposes. It has been discounted on the basis that the unit is clearly unsuitable for discount food retail of both the form and scale of the proposals, as presented through this application, or a flexible form of them.

Site 11:	Wellington Way, WaterlooVille	
Sequential Status	In-Centre/Primary Shopping Frontage.	
Current Use(s)	Purpose built 1970's shopping parade with high vacancy rate (including vacant units fronting London Road).	
Relevant Planning History	The site is subject to a current 'live' planning application (Ref. APP/18/00234) which seeks planning consent for demolition of existing shopping parade and redevelopment of the site to provide a nine storey building consisting of 264no. 1-bed/studio build to rent apartments and associated amenity facilities, an A2 unit (Financial and Professional Services), together with associated parking and landscaping. This application is currently awaiting determination. A further application (APP/19/00513) seeking approval for the erection of a multi-storey car park to provide 263 car parking spaces on the existing Wellington Way car park has also been submitted to the Authority and is awaiting determination. It is the suggestion, through this application, that the additional spaces would be made available to the occupants of the proposed residential accommodation at Wellington Way, subject of planning application APP/18/00234.	 
Planning Policy	Wellington Way (including retail parade) is the subject of allocation Policy W110 'Wellington Way' within the Council's adopted Allocations Document (2014) which identifies the site as forming part of an allocation to improve the viability and vitality of the town centre and accommodate residential development. It is also identified as providing a development opportunity to contract the retail offer and introduce high density residential development. The site is subject to a further allocation within the Council's emerging Havant Borough Local Plan (HP2). The focus for this area is, clearly, one of high quality, high density residential development.	
Assessment	Whilst Wellington Way contains a high number of vacant units, none are of an appropriate size to accommodate the application proposals or a flexible form of them. Furthermore, the site is subject to comprehensive development proposals for a major residential led development which are not, in any way, reliant on a discount foodstore to come forward. For these reasons available units at Wellington Way are both unsuitable and unavailable for sequential test purposes.	

Site 12:	Asda/Community Centre, Portland Road, PO7 7XR	
Sequential Status	In-Centre.	 
Current Use(s)	Asda Foodstore and Waterloooville Community Centre.	
Relevant Planning History	Various planning applications associated with long-standing retail use of the site. Application for extension to community centre (Ref. APP/18/00630) for use as a post office (APP/13/00126).	
Planning Policy	This sequential site relates to Waterloooville Community Centre, Asda car park and adjacent Asda foodstore. The site falls within the defined town centre (Waterloooville) and is also part of Allocation W109 under Policy WA2 for Waterloooville mixed use allocations. These consider the site being suitable for housing and main town centre uses. The site was identified through the Waterloooville Town Centre Framework SPD and considered to represent an important redevelopment opportunity for the town centre that has the potential to transform it in terms of urban design and shopping facilities. The Waterloooville Major Development Area (MDA) to the west represents an opportunity for interaction with the east of the town centre. One of the site specific development requirements for bringing the site forward includes the relocation of the existing Asda store, or re-provision if required. The allocation is taken forward through Policy KP2 'Waterloooville town Centre' which notes the following <i>“if this area becomes available for development, a comprehensive approach should be taken which considers residential, community, leisure and retail redevelopment. Development is expected to re-provide community centre, provide a comprehensive mixed use development and improve pedestrian and cycle connectivity”</i>.	
Assessment	This site is not available for sequential test purposes and remains in active use. Nor can it be said the site will become available within a reasonable period of time. There are no indications existing occupiers are in the process of relocating and owing to the requirements to deliver a comprehensive development at this location, this is not likely to be achieved in the short-medium term. Furthermore, to bring forward a discount foodstore at this location would require the re-provision of the existing Asda foodstore. There is no indication the site is available for this purpose, nor is it realistic that such a proposition would be supported by Asda to directly benefit one of their competitors.	