
PLANNING STATEMENT

**INCORPORATING
DESIGN AND ACCESS STATEMENT
AND SEQUENTIAL TEST**

ON BEHALF OF



**FORMER ICTS SITE, SOLENT ROAD,
HAVANT**

FEBRUARY 2016



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1 INTRODUCTION

BACKGROUND

- 1.1 This statement has been prepared, on behalf of Hargreaves Properties Ltd, in support of a full planning application, in relation to the former ICTS site, on Solent Road, Havant.
- 1.2 Outline planning permission for the redevelopment of the site to provide a single employment unit was approved in November 2012. Subsequently, reserved matters together with the discharge of pre-commencement conditions were approved in November 2015. The construction of the unit has commenced and will be built out in accordance with the approved details.
- 1.3 Whilst occupiers are sought for the site, Hargreaves would like to extend the range of uses permitted to include A1 Retail. This would provide maximum flexibility and provide certainty as to the underlying uses for prospective occupiers.
- 1.4 In these terms, full planning permission is sought for the following:

The redevelopment of the site to provide up to 948sq.m (gross internal) of Class B1c (light industry) and/or Class B2 (general industrial) and/or Class B8 use (storage and distribution) and/or Class A1 (retail), to include ancillary trade counters and Class B1a use (offices), with associated access, car parking and landscaping.

STRUCTURE OF THE STATEMENT

- 1.5 This Statement identifies and appraises the planning issues relevant to the determination of this application. In particular, the statement:
- Describes the site and its surroundings;
 - Reviews the planning background of the site and the surrounding area;
 - Describes the development proposals;
 - Sets out design and access considerations;
 - Appraises planning policies and guidance;
 - Reviews the outcomes of the sequential assessment; and
 - Evaluates the relevant planning considerations arising.

APPLICATION DOCUMENTS

- 1.6 The application, including this planning statement, is to be read in conjunction with the following which are:
- The application forms signed and dated;

- The relevant certificates signed and dated;
- Site Location Plan (Ref: 480/33/1_1);
- Parking Note (prepared by David Tucker Associates).

1.7 In addition to the above, this application should be read in conjunction with the approved outline consent and reserved matters/discharge of conditions, as much of this detail will remain unchanged.

1.8 Outline consent documents:

- Planning Statement, prepared by Rapleys (May 2012)
- Design and Access Statement, prepared by Rapleys (May 2012) – as attached to this statement.
- Land Contamination Assessment,
- Noise Impact Assessment,
- Location Plan (Dwg no. 480/33/1_1),
- Existing Site Survey (Dwg no. P04),
- Site Plan (Dwg no. P02 Rev J),
- Parameters Plan (Dwg no. P03),
- Proposed Elevations (Dwg no. 301),
- Proposed Floor Plan and Sections (Dwg no. 201 Rev B).

1.9 Reserved matters and discharge of conditions documents:

- Covering Letter and Statement,
- Site Location Plan (Dwg no. 480/33/1_1),
- Elevations and Sections (Dwg no. 148-100-300),
- Hard and Soft Landscaping Plan (Dwg no. 148-100-101P),
- Drainage/Service Plan (Dwg no. 1480-100-105P),
- External Works Details (Dwg no. 146-300-109 Rev C),
- Dust Assessment and Mitigations Measures,
- Section 278 Deed of Agreement.

- 1.10 All of these documents form part of this submission and should be referenced on the forthcoming planning permission.

2 SITE AND SURROUNDINGS

THE SITE

- 2.1 The site is located on Solent Road, near to its junction with Brockhampton Lane, approximately 0.5km to the south-west of Havant Town Centre and is defined on the Site Location Plan (Ref: 480-33-1_1), attached as **Appendix 1**. The site is generally flat, and extends to approximately 0.21 hectares.
- 2.2 The site formerly occupied by ICTS Havant Ltd, however the building has now been demolished and the new building is under construction. Access to the site is from Solent Road, with a large area of hard-standing (used for servicing, deliveries and parking) to support the previous operation. The site is enclosed by 2 metre high palisade fencing.

THE SURROUNDING AREA

- 2.3 The site is largely bounded by highways, including Solent Road to the north, and the A27 (Havant Bypass) to the south.
- 2.4 To the west of the site is a group of traditional two-storey (terraced) residential properties. The rear gardens for those properties immediately adjoin the application site. Beyond the residential properties, along Solent Road, is Solent Trade Park and Jewsons builder's yard.
- 2.5 To the east, and immediately adjoining the site, is a petrol filling station site (which forms part of the wider Tesco Superstore Site). Further to the east is a large Tesco superstore, which benefits from undercroft parking and an additional surface level car park.
- 2.6 On the opposite side of Solent Road is a group of shed-type industrial buildings, which includes a laundry and dry cleaning establishment. Further to the east along Solent Road is the Solent Retail Park, which incorporates a number of retail operators, including Next, Laura Ashley and Halfords.
- 2.7 Generally, site lies within an industrial/commercial area adjacent to Havant Town Centre. It has ready access to the A27, the A3(M) and M27, providing links to Portsmouth and Southampton to the west. Please refer to the site context plan attached at **Appendix 2**.

3 PLANNING HISTORY

THE SITE

- 3.1 Outline planning permission (Ref: APP/12/00504) for the redevelopment of the site to provide up to 948sq.m (gross internal) of Class B1c (light industry) and/or Class B2 (general industrial) and/or Class B8 use (storage and distribution), to include ancillary trade counters and Class B1a use (offices), with associated access and car parking, was approved in November 2012.
- 3.2 A reserved matters application (Ref: APP/15/00965) for landscaping (condition no.2) of outline planning permission APP/12/00504 together with discharge of condition 3, 4, 5, 6, 7, 9, 15, 16, 17 and 18 was approved.
- 3.3 The details which required discharge in advance of site clearance, and commencement of development are set out below:
- Condition 3: Landscaping details.
 - Condition 4: Access details and surface water disposal.
 - Condition 5: Details of trees and other vegetation and layout of all foul and surface water drainage and other underground services.
 - Condition 6: Samples and details of all external facing and roofing materials.
 - Condition 7: Plans and particulars specifying the finished levels.
 - Condition 9: Progress for the suppression of dust during the construction/demolition of the development.
 - Condition 15: Specification of the materials to be used for the surfacing of all open parts of the site proposed to be hard surfaced.
 - Condition 16: Details of boundary treatments and means of enclosure.
 - Condition 17: Tree and hedgerow protection measures.
 - Condition 18: Details of external lighting.
- 3.4 In light of the approval of the conditions above, construction of the unit has commenced, and the development will be built out in accordance with these details.
- 3.5 Given this context, these matters should not be subject of review of this planning application. As will be described more fully in the next section, the only matters that are the subject of review for this planning application are those relating to the principle of Class A1 (retail) use on the site.

4 THE PROPOSAL

4.1 This application seeks full planning permission for:

“The redevelopment of the site to provide up to 948sq.m (gross internal) of Class B1c (light industry) and/or Class B2 (general industrial) and/or Class B8 use (storage and distribution) and/or Class A1 (retail), to include ancillary trade counters and Class B1a use (offices), with associated access, car parking and landscaping”.

4.2 As you will recall, outline planning permission was granted for a single employment unit in November 2012. Whilst occupiers are sought for the site, Hargreaves would like to seek maximum flexibility in order to allow the building to accommodate for a range of uses. Thus, beyond the land uses permitted by the outline consent, this application simply seeks to include Class A1 (retail) as an acceptable use on site.

4.3 The application relates to full planning permission as detailed matters such as layout, access, appearance, landscaping and scale remain unchanged to those approved under the reserved matters applications.

4.4 Given the location and appointment of the site and its building, the most likely retail occupiers are likely to be bulky goods retailers. In these terms, the following condition is suggested for imposition onto any planning permission:

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

5 DESIGN AND ACCESS CONSIDERATIONS

- 5.1 The proposed access, layout, scale and general character of the building remains as per the details submitted and agreed as acceptable as part of the outline and reserved matters submissions.
- 5.2 As previously mentioned the construction of the unit has commenced, and the development will be built out in accordance with the previously approved details. As such these design and access matters should not be subject of review.
- 5.3 For completeness, please refer to the previous Design and Access Statement which has fully appraises the design and access considerations. The statement is attached at **Appendix 3**.
- 5.4 However, it should be noted that a number of matters have evolved since this statement was prepared. These are set out below:
- The surrounding area has been the subject of major regeneration with the expansion of Solent Retail Park to include M&S and NEXT, the construction of the Tesco Superstore and the construction of Solent Trade Park all within close proximity to the site, and
 - The planning policy background has evolved with the adoption of the Havant Borough Local Plan – Allocations (July 2014) which replaces the saved policies of the Havant Borough District-Wide Local Plan (albeit no saved policies were relevant to the proposal).
- 5.5 In light of the above, the relevant design and access considerations would tell in favour of retail as a proposed land use at the site.

6 PLANNING POLICY AND GUIDANCE

- 6.1 This section provides a summary of the relevant planning policy, as set out by the National Planning Policy Framework (2012), the Local Development Plan for Havant Borough Council.

NATIONAL POLICY

- 6.2 The National Planning Policy Framework ('NPPF') (2012) sets out national planning policy and guidance in terms of securing sustainable development.
- 6.3 The NPPF is underpinned by a presumption in favour of sustainable development which the document identified as a "golden thread" running through both plan-making and decision-taking.
- 6.4 In these terms, paragraph 14 advises that Local Planning Authorities should seek to approve development proposals that accord with the Development Plan without delay, whilst also granted permission for proposals in instances where the Development Plan is absent, silent or relevant policies are out of date unless the impacts of doing so would significantly outweigh the benefits.
- 6.5 The NPPF identifies core planning principles (paragraph 17) to underpin both plan-making and decision-taking and these principles are that planning should, inter alia:
- Be plan-led;
 - Not simply be about scrutiny, but be a creative exercise to find ways to enhance and improve places in which people live their lives;
 - Encourage the effective use of land by reusing land that has been previous development, and
 - Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.
- 6.6 In order to achieve the delivery of sustainable development, the NPPF sets out several underpinning aims, which provide the context of assessment of development proposals.

- 6.7 The different aims – in so far as they are relevant to the assessment of this application – are set out in turn below.

Building a Strong, Competitive Economy

- 6.8 The NPPF confirms that the Government is committed to ensuring that the planning system supports economic growth. To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business.

Requiring Good Design

- 6.9 The NPPF confirms that design is a key aspect of sustainable development and should contribute positively to making places that are for people. In these terms it is important to plan positively for

the achievement of high quality and inclusive design for all development including individual buildings, public and private spaces and wider area development schemes.

Promoting Healthy Communities

- 6.10 The NPPF advises that planning decisions should aim to achieve safe and accessible environments where crime and disorder (and the fear of crime) do not undermine the quality of life or community cohesion. Local authorities should encourage safe and accessible developments which contain clear and legible pedestrian routes and high quality public space that encourage the active and continual use of public areas.

Town Centres

- 6.11 In the context of retail development, the NPPF requires that planning applications for retail and other main town centre uses that are not in an existing centre, and not in accordance with an up-to-date local plan, be assessed on the basis of the sequential approach to site selection (paragraph 24).
- 6.12 Paragraph 24 outlines a preference for main town centre uses to be located in town centres and then edge of centre locations, and only where suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, the NPPF advises that preference should be given to accessible sites that are well connected to the town centre. There is a requirement to demonstrate flexibility on matters such as format and scale by both applicants and local planning authorities.
- 6.13 Paragraph 27 of the NPPF states that where an application fails to satisfy the sequential test or is likely to have a significant adverse impact on one or more of the tests, planning permission should be refused.

THE DEVELOPMENT PLAN

- 6.14 The Development Plan consists of the Havant Borough Local Plan – Core Strategy (adopted March 2011), the Havant Borough Local Plan – Allocations (adopted July 2014) and the Local Plan Policies Map.

Policies Map

- 6.15 The site is not within or adjacent to a Conservation Area and is not subject to any other designations. There are no buildings or structures which are statutory or locally listed, and no tree preservation orders (TPOs) exist on the Site.

Local Plan – Site Allocations

- 6.16 The proposed Solent Road South Allocation (Site Ref/Policy Number: BD16) encompasses the former ICTS site and Solent Road Trade Park.
- 6.17 The Allocations document recognises the development opportunities as:

- A brownfield site with considerable redevelopment potential close to Havant Town Centre,
- It could provide 6,00sq.m of offices, manufacturing and warehousing and provide 143 to 833 jobs,
- Potential for showrooms with trade counter facilities that cannot be accommodated within Havant Town Centre.

Local Plan – Core Strategy

- 6.18 The relevant policies within the Core Strategy in respect of the proposal are outlined below:
- 6.19 **CS4 (Town Centres)** – This policy sets out the approach to town centre related development. It identifies a requirement for 13,000sq.m of additional comparison goods floorspace up to 2016 for the identified centres. The policy defines Waterlooville, together with Havant, as a town centre, whilst a number of district and local centres are also identified.
- 6.20 Paragraph 3.39 of the Core Strategy states that applications for town centre uses on sites which are outside of town centres, particularly those for new retail floorspace, will be required to demonstrate the application of the sequential approach to the site selection and an assessment of impact in a robust and transparent manner.
- 6.21 **CS6 (Regeneration of Borough)** – Planning permission will be granted for development which positively contributes by type of use and design and by its comprehensive approach to the social, economic and/or physical regeneration of the whole Borough.
- 6.22 **CS8 (Community Safety)** – Planning permission will be granted for development proposals that:
- Engrain community safety;
 - Provide well-lit footpaths, cycle ways and roads providing that this does not adversely affect designated habitats or the landscape;
 - Maximise opportunities for natural surveillance through good design and, and
 - Maximise the amount of ‘defensible space.’
- 6.23 **CS16 (High Quality Design)** – Planning permission will be granted for development that is designed to a high standard, which helps to create places where people want to live, work and relax. All development should demonstrate that its design, inter alia:
- Responds to, draws inspiration from and respects local context;
 - Produces a positive relationship between buildings, street and spaces both existing and proposed;
 - Is inclusive by considering the needs of those with disabilities, ensuring safe and convenient access for all;
 - Maximises opportunities for mixed use development;

- Mitigates negative environmental impacts; and
- Adapts to the changes needs of its users.

6.24 **CS17 (Concentration and Distribution of Development within Urban Areas)** – Development will be permitted that makes the most effective use of land in the borough,

6.25 **CS20 (Transport and Access Strategy)** - Development will be permitted that:

- Is consistent with and contributes to the implementation of the ‘Reduce, Manage and Invest’ strategy;
- Does not increase congestion and promotes better use of existing transport networks;
- Improves accessibility of goods, services and employment and promotes equality in the transport systems;
- Provides transport management measures to ensure the safe and efficient operation of the strategic and local road network;
- Ensures that highway design responds positively to the characteristics of the area and delivers a high quality public realm for all users;
- Maintains or improves the range of transport modes accessible to the users of the development site with specific emphasis on public transport, especially high quality/frequency buses and includes walking and cycling where appropriate, and
- Improves highway, cycling and pedestrian links between the western built up area of the borough (Waterlooville) and the eastern area of the borough (centre on Havant) to create a strong east/west communication axis that passes through Dunsbury Hill Farm/Leigh Park.

6.26 **DM6 (Coordination of Development)** – Proposals will only be permitted where they do not undermine the future development potential of adjacent sites.

SUMMARY

6.27 From the foregoing commentary, the site is allocated, within the Development Plan, as a brownfield site with considerable redevelopment potential. Further the site’s allocation recognises that the site could be suitable for retail facilities that cannot be accommodated within Havant Town Centre.

7 PLANNING CONSIDERATIONS

- 7.1 In general terms, the Local Authority has granted planning permission for development identical to this proposal. Further, it should be noted that the outline planning permission has been implemented (albeit not occupied).
- 7.2 As detailed in Section 4, the only alteration to the consented scheme is the ability for the site to be occupied as A1 retail. In pre-application discussions with the Local Authority the only additional planning considerations that were identified were:
- The quantum of parking provision, and
 - A sequential approach to site selection.
- 7.3 In light of the above, the application has been supported by a Parking Note, prepared by David Tucker Associates, and the required Sequential Assessment has been undertaken, the results of which are contained within Section 7 of this statement.

- 7.4 The planning issues relevant to the determination of this application are set out in further detail below.

PRINCIPLE OF THE LAND USES

- 7.5 Section 70(2) of the Town and Country Planning Act requires that a local planning authority should have regard to the provision of the Development Plan in determining a planning application.
- 7.6 Paragraph 14 of the NPPF (2012) states that the presumption in favour of sustainable development should be seen as the golden thread running through both plan-making and decision-taking. For decision-taking this means approving development proposals that accord with the Development Plan without delay.
- 7.7 As previously detailed, the Development Plan confirms that employment uses (including B1c, B2 and B8, with ancillary trade counters and officers) are acceptable on the site, and the Local Authority have confirmed its support in the approval of the outline planning permission at the site.
- 7.8 In terms of retail, the NPPF and local policy requires that planning applications for retail uses on sites outside of existing centres, and not in accordance with an up-to-date local plan, be assessed on the basis of the sequential approach to site selection. As such, this submission has been supported by a Sequential Assessment which is detailed in Section 7.
- 7.9 Further, it should be recognised that the location and status of the site presents a clear opportunity to accommodate retail development because:
- It lies within an established retail / trade area that has been the subject of major regeneration with the expansion of Solent Retail Park to include M&S and NEXT, the construction of the Tesco Superstore and the construction of Solent Trade Park all within close proximity to the site,

- The site is in close proximity to Havant Town Centre and public transport facilities, in addition to the wider strategic network,
- There are no sequentially preferable sites within Havant Town Centre, or Leigh Park District Centre, and
- Its redevelopment will deliver sustainable economic development, to the benefit of the Borough.

7.10 In light of the above, it is considered the site is well suited to occupy retail development and the relevant retail policy assessments have been satisfied. Thus, the proposed retail use is acceptable in planning terms.

TRANSPORTATION

7.11 The quantum of floorspace proposed does not generate a requirement to provide a Transport Statement/Assessment in support of the proposals.

7.12 A Parking and Transport Note has been prepared by David Tucker Associates confirming the proposal's acceptability in parking terms.

7.13 It is therefore considered that the proposal is acceptable in terms of transportation.

DESIGN AND LAYOUT

7.14 The design and layout of the scheme will remain unchanged.

7.15 The acceptability of the layout and design of the scheme has been fully appraised within the Design and Access Statement and accepted by the Council in the approval of outline application.

7.16 It is considered that the proposal is acceptable in terms of design and layout.

DETAILED MATTERS

7.17 A number of detailed matters have been approved by way of a reserved matters application; these will remain the unchanged, and thus are accepted by the Local Authority.

7.18 The relevant details include:

- **Landscaping** – The landscaping details are illustrated on dwg no. 148-100-101 P.
- **Access** – The details for all new and altered accesses please see details pursuant to the S.278 Deed of Agreement, dated 11 August 2015.
- **Drainage Details** – The details, relating to, the existing trees and other vegetation to be retained and layout of all foul and surface water drainage and other underground services proposed to serve the development are illustrated on dwg. 148-100-105-P.
- **Materials** – Samples and details of all external facing and roof material, as illustrated on dwg no: 148-100-300-P.

- **Ground Levels** - Finished ground levels in relation to the existing, as illustrated on dwg no: 148-100-105-P.
- **Hard surfacing** – Specification of the materials to be used for the surfacing of all open parts of the site proposed to be hard surfaced, as illustrated on dwg no: 148-100-101-P.
- **Boundary Treatment** – Details specifying the alignment, type, height of all proposed screen walls, fences, hedges and other enclosures as illustrated on dwg no. 148-100-101-P.
- **Mitigation of Dust** - The programme relating to the suppression and mitigation of dust during the construction/demolition phase of the development.

SUMMARY

7.19 In the context of above, the proposal is acceptable in terms of:

- Principle of the land uses,
- Transportation,
- Design and layout, and
- Details development management considerations.

7.20 As such, planning permission should be granted at the earliest opportunity.

8 SEQUENTIAL ASSESSMENT

8.1 As detailed in the planning policy section, the NPPF requires that planning applications for retail and that are not in an existing centre, and not in accordance with an up-to-date local plan, be assessed on the basis of the sequential approach to site selection.

8.2 As such, we have undertaken a Sequential Site Assessment, to illustrate that the proposals fully comply with all national and local level policy guidance. The assessment has been undertaken in accordance with the relevant guidance.

METHODOLOGY

8.3 A sequential assessment was undertaken in January 2016, and as agreed with Planning Officers at Havant Borough Council, the assessment has reviewed potential “opportunities” within Havant Town Centre and Leigh Park District Centre.

8.4 Each of the identified sites has then been assessed using the following criteria, to ascertain whether they form sequentially preferable alternatives to the subject site in terms of:

- Availability – whether the sites are available now or are likely to become available for development within a reasonable period of time;
- Suitability – whether due regard has been given to the requirements to demonstrate flexibility; and
- Viability – whether development would be viable on the sites.

8.5 In considering whether a site is ‘suitable’ under the sequential approach the “Dundee” decision confirms that this means ‘suitable for the development proposed by the applicant’, rather than ‘suitable for meeting identified deficiencies in the area’. As such, when considering the sequential test the relevant matter is whether the site is suitable for accommodating the type of retail development proposed.

8.6 Further, a call-in decision by the Secretary of State in June 2014 (after the committee resolution relative to the previous application), known as the “Rushden Lakes” decision, confirms that developers should not need to alter or reduce the proposal to fit on an alternative site. In these terms, when considering other sites, only the ability for the “application” to be accommodated on alternative sites is relevant.

CONCLUSION

8.7 The full sequential assessment has been completed and is attached at **Appendix 3** of this statement. In summary, it was concluded that none of the sites identified can be considered sequentially preferable.

8.8 In the majority of cases, the sites were deemed to be unsuitable for the proposed development. It was deemed that size of the units would not provide sufficient floorspace and the location of the sites would not allow adequate at level dedicated parking or servicing provision.

9 SUMMARY CONCLUSIONS

9.1 In essence the planning application seeks to extend the range of uses permitted, by the Outline Consent, to include A1 Retail. As such, full planning permission is sought for:

“The redevelopment of the site to provide up to 948sq.m (gross internal) of Class B1c (light industry) and/or Class B2 (general industrial) and/or Class B8 use (storage and distribution) and/or Class A1 (retail), to include ancillary trade counters and Class B1a use (offices), with associated access, car parking and landscaping”.

9.2 Beyond the inclusion of retail floorspace, all other matters have been accepted by the Local Authority under the Outline and Reserved Matters applications. Overall, this Statement and supporting submissions demonstrate that A1 retail should be supported.

9.3 The following key matters should be noted:

- The site lies within an established retail / trade area that has been the subject of major regeneration with the expansion of Solent Retail Park to include M&S and NEXT, the construction of the Tesco Superstore and the construction of Solent Trade Park all within close proximity to the site,
- The site is in close proximity to Havant Town Centre and public transport facilities, in addition to the wider strategic network,
- There are no sequentially preferable sites within Havant Town Centre, or Leigh Park District Centre,
- The level of parking proposed is appropriate, given the land uses and occupiers envisaged, and
- Its redevelopment will deliver sustainable economic development, to the benefit of the Borough.

9.4 In conclusion, the proposal should be supported by the Local Authority and planning permission should be