

Planning Application Response of Planning Policy / Urban Design

Application No:	APP-13-00893
Site Address:	BAE System, Elettra Avenue, Waterloooville, PO7 7XS
Development:	Outline application for mixed-use employment, leisure and retail development to comprise demolition of Main Building and erection of Class C1 hotel, Class D2 cinema, 3No. Class A3 restaurants, Class A4 public house, Class A3/A5 drive-thru restaurant, Class A1 foodstore and retention of E Block for use as Class B1 offices or conversion to Sui Generis bowling complex, Class D2 health and fitness centre, and Class A3 restaurant.
Case Officer:	Aaron Wright
Comments by:	Lucy Howard
Date of Comments:	22 November 2013

These comments address the issues raised in the letter dated 11th November 2013 from RPS on behalf of Lidl GmbH. These comments are made further to the policy comments dated 8th November 2013.

Promoting Havant Borough's Economy: The site is identified for mixed use redevelopment under emerging policy WA2 of the Publication version of the Allocations Plan. The proposed uses are employment (no net gain), hotel and commercial uses reflecting the extant permission for the site. This current application is therefore broadly in line with the application although there will be a net loss of traditional B class employment floorspace rather than no net gain. There will, however, be over 200 FTE jobs created through this scheme.

The site opportunities section of the site profile for BAE in the emerging Publication version of the Allocations Plan does identify large scale leisure uses that could not be accommodated in the town centre. It does not explicitly say that the site is not suitable for retail uses.

The letter from RPS refers to disaggregation of the scheme. Current Government policy set out in paragraph 24 of the NPPF requires applicants to demonstrate flexibility on issues such as format and scale. This supersedes Government policy EC16 of PPS4 that required disaggregation of specific parts of retail and leisure developments. The applicant has shown flexibility by disaggregating the supermarket from the rest of the scheme.

It is agreed that Lidl and the Co op are the anchor stores for Cowplain District Centre. This is a very healthy centre with no current vacant units. The Retail and Leisure Assessment looked at the single and cumulative impact of the development on Lidl, the Co-op, other local shops in the district centre and the total impact on Cowplain District Centre. These are set out in the table below:

	Total trade diversion (£m)	Single impact of Aldi (%)	Total trade diversion (£m)	Cumulative impact (%)
Lidl	-£0.87	-20.5	-£0.88	-20.8
Co-op	-£0.01	-0.2	-£0.02	-0.6
Other local shops	£0.00	0.0	£0.00	0.0
Cowplain DC total	-£0.87	-8.4	-£0.90	-11.3

It is clear that the new Aldi store will have a significant impact on the existing Lidl store and to a lesser extent on the wider district centre. However, the Lidl store is trading so successfully it is unlikely that it will not be able to retain a sufficient number of customers to go on trading successfully albeit at a lower level. Trade diversion from the anchor store will impact on the other stores in the district centre, but again not to such an extent that it would have a significant adverse impact.

The Allocations Plan sets out a requirement of 13,000 square metres of new comparison floorspace. There will be some comparison floorspace in the proposed Aldi store and this was addressed in the impact assessment in the Retail and Leisure Assessment and Planning Statement Addendum.

The Borough Council's Town Centres, Retail and Leisure Study states that there is limited potential for further convenience goods floorspace within the Borough, allowing for existing commitments. The letter from RPS therefore concludes that the application is contrary to the Local Plan evidence base. However, it should be noted that Government policy has not required retail applications to demonstrate need since PPS6 was superseded by PPS4 and then the NPPF. Instead need forms an intrinsic element of the impact assessment, which has been done in full by the applicant.

The Retail and Leisure Assessment submitted as part of the application states that Lidl is over-trading by 47% when compared to the company's average benchmark. This is based on information taken from the Council's own retail study and Verdict 2012, which is a leading retail analyst. Confirmation is required from the applicant that the figures set out in table 4 of their Retail and Leisure Assessment are correct. If the level of over-trading is incorrect this will alter the impact of the trade diversion on the store.

Table 2a and 2b set out the per capita expenditure in the west of the Borough. RPS have highlighted an error in how the applicant has applied expenditure growth rates. Revisions are required to tables 2a and 2b using the correct growth rates. Revisions are also required for all tables which tables 2a and 2b feed into along with an explanation of the significance of these changes in turn of turn-over and impact.

The objection from RBS sets out a number of tables that update table 2a, 2b, 3a and 3b of the Retail and Leisure Assessment submitted as part of the application. Clarification is required from the applicant on whether these revised tables are correct. The main finding of these updated tables is that there is a reduction of £2.55m in the total convenience spend in the west of the Borough in 2018. Clarification is required on how this will alter the turnover of Lidl, the level of over-trading and the level of impact.

Policy Principle of Development: Further information required in order to assess whether the proposed foodstore will have a severe adverse impact on Lidl, which is the main anchor store for Cowplain District Centre.