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Ask For: Mrs A Wright
Email: planning.development@havant.gov.uk

07 February 2012

Dear Mr Wilmshurst

Site Location: BAE Systems Technology Park, Elettra Avenue, Waterlooville, PO7 7XS

Re: Mixed re-development to include retail, food retail, hotel and Industrial units following demolition of existing buildings.

I refer to our meeting on letter dated 14 January 2009 regarding the redevelopment of the above site. The proposal is for 11,700m² of industrial floor space, 2 drive through restaurants, 50 bed hotel, retail store and restaurant. I have summarised the main issues regarding the redevelopment of the site below.

Planning Policy

All the proposed uses are forms of economic development as defined by Planning Policy Statement 4 (PPS4) as they provide jobs. It is therefore necessary to assess the proposals against the five impact considerations set out in policy EC10.

The proposed re-development will involve the demolition of most of the existing employment buildings on the site. The re-provision of 11,700 squared metres of new employment floorspace is welcomed. Core Strategy policy CS2 safeguards all existing employment sites that are fit for purpose. Robust and credible evidence on viability and marketing is required to demonstrate that the site is no longer fit for purpose as wholly employment site. The application will therefore need to comply with all aspects of Core Strategy policy DM3 which sets out detailed requirements for the marketing process. Reference should also be made to the Havant Borough Employment Land Review (ELR), which forms the main evidence based study on employment in the Borough. This site is identified as BD54 and is given an overall average score of 2.4 out of 3.

If it were established that the existing employment site is not fit for purpose, policy CS2.6 states that other forms of economic development should be considered. This proposal complies with this stepped approach. However; proposals for land uses that are both forms of economic development and 'town centre uses' also have to comply with Core Strategy policy CS4, saved Local Plan policy TC1 and all the relevant policies in PPS4. It is also sensible to consider which uses complement the business offer at Brambles Business Park. A hotel and linked restaurant might be said to enhance the business offer whereas the drive-through restaurants and discount supermarket could be said to detract from it.

The site is not in a town centre as defined in Core Strategy policy CS4 and saved Local Plan policy TC1. It is out-of-centre for both retail and other main town centre uses as defined in PPS4. An edge-of-centre site for retail purposes is regarded as one which is 300 metres from the primary shopping area. The site is approximately 740 metres from the primary frontage identified in saved Local Plan policy TC6.

An edge-of-centre site for other main town centre uses is 300 metres from the town centre boundary. The site is approximately 540 metres from the boundary of Waterloooville Town Centre boundary. Furthermore, PPS4 states that when defining whether a site is out of or edge of centre account should be taken of local circumstances. Both Maurepas Way and Hambledon Road form major barriers to accessibility both visually and physically. It should also be noted that the draft National Planning Policy Framework (NPPF) continues to recognise town centres as the heart of our communities.

It should be noted that a review is underway of all the boundaries in the borough's town, district and local centres. A document recently closed for consultation and the response to this will feed into the Allocations Plan. Here is a link to the document <http://www.havant.gov.uk/havant-12049> The consultation document did propose the extension of Waterloooville Town Centre in a north westerly direction to include the existing Wellington Retail Park but it did not propose the inclusion of the Brambles business area within the boundary.

A sequential assessment is required for the retail and leisure aspects of the scheme namely the hotel, supermarket, restaurant and drive through restaurants under policy EC14 of PPS4. Policy EC15 sets out the requirements for this assessment and the Practice Guidance sets out full details of these requirements and good practice. It should also be noted that the draft NPPF continues to require local planning authorities to apply a sequential approach to planning applications for retail and leisure uses. The area of search should be town centre and edge-of-centre sites in the western part of the Borough including the Waterloooville sites listed in Appendix E of the Town Centres, Retail and Leisure Study produced by NLP for the Borough Council in 2008. The sequential assessment must address in particular policy EC15.1.d and demonstrate flexibility by disaggregating specific parts of the scheme on to separate, sequentially preferable sites.

An impact assessment is required for the retail and leisure aspects of the scheme restaurants under policy EC14 of PPS4. The total floorspace for the hotel, supermarket, restaurant and drive through restaurants is 2,455 m2. If the supermarket was removed from the scheme this would reduce the total scale of the scheme below the 2,6500 m2 threshold set in EC14.4. A local floorspace threshold has not been set in the Havant Borough LDF.

PPS4 indicates that applicants are no longer required to demonstrate need. Nevertheless expenditure capacity is relevant in terms of assessment of impact i.e. positive and negative impacts. The Town Centres, Retail and Leisure Study produced by NLP for the Borough Council in 2009 concluded that there is limited capacity for additional convenience facilities in Havant Borough for the foreseeable future (para 9.79).

Skills and employability are an important issue for the borough. An Employment and Skills Plan will be required to maximise the benefits of the development to local people through jobs and training. The plan will apply to both the construction and occupancy phase of the development. Further details can be obtained from the Economic Development officer.

There is no policy objection to the B1c/B8 units; the hotel might be justified in policy terms as a complement to the business offer at the Brambles; the linked restaurant would in turn serve the hotel. However, it is likely that the proposed supermarket and drive through restaurants would have an adverse impact on Waterloooville Town Centre and are therefore contrary to policy.

Sustainability

Development would need to comply with Core Strategy policy CS14 on the efficient use of resources. The policy requires new development to meet BREEAM standard 'very good'.

Highway and Infrastructure

The transport and highway implications of this development need to be considered carefully. It should be noted that the approved Sainsbury's development in Hambledon Road will involve a significant re-configuration of the local road network which this scheme needs to take fully into account.

At this stage there is no information regarding quantum of traffic, multi-modal trip generation or parking demand to arise from the proposal. A Transport Assessment (TA) will be required as part of the Planning Application which will need to comply with the requirements of the DfT Guidelines for Transport Assessments (2007). A travel plan is also required as part of the application. The development would be subject to a transport contribution. Graham Wright from Hampshire County Council is happy to discuss the transport implications of their emerging proposals and would welcome early development of a scoping note for the Transport Assessment.

Environmental Health

Ground conditions

The Council's Environmental Health Officer has been consulted on the proposal and has made the following comments. He is not aware of the specific business activities carried out at the site since its construction [between 1982 & 1991], however he is aware that it was marked on mapping as being 'research & development' for Marconi. Whilst the description 'R&D' may refer to entirely innocuous activities not involving the handling or use of potentially contaminating substances; laboratory activities (whether electronics / materials science, or other) may indeed involve the use of chemicals that could potentially be extremely hazardous to both human health, and the wider environment. It is considered possible therefore that activities on this site have the potential to have resulted in a degree of ground contamination.

In terms of human health, the proposed site uses (commercial, light industrial, retail, food & hotel accommodation) are not considered particularly sensitive, however there may be a degree of risk from exposure to any contamination that might be present at the site.

With respect to the wider environment, the site is not within a groundwater protection area, and indeed is classified as a 'non-aquifer'. However, the local geology is [clay] head deposits (superficial) and London Clay (bedrock), and both of these geological units are locally heterogeneous and may contain significant sand or gravel deposits which may permit preferential migration of contamination. This is potentially significant, as there are a number of nearby surface water courses, with a channel culvert running beneath the site. This channel may be considered by the Environment Agency as a 'controlled water', as it feeds into a wider channel transecting a number of sites important for local nature conservation (SINC's) further downstream.

Both 'general industrial' and 'laboratory / research facilities' could reasonably be considered potentially contaminating, and whilst the nature of the proposed development is not particularly sensitive; it is considered both prudent & reasonable to establish the ground conditions and to ensure that any the degree of associated risk to both local surface waters and human health are considered as an integral part of the site re-development.

Air Quality

Air quality assessments undertaken both as part of the development control process (other local developments), and forming part of the Council's Local Air Quality Management (LAQM) reporting have identified predicted results (within the range of modelling uncertainty) exceeding the National Air Quality Objective Value for annual average atmospheric Nitrogen Dioxide, and in any event representing a significant[^] increase in road traffic generated air pollution.

[^ - using the Association of London Governments (ALG) assessment criteria]

Identified impacts relate in particular to sensitive receptors located at:

Forest End (London Road [A3]/London Road/Rockville Drive/Maurepas Way [A3] junction)

- The Grainger MDA Site [approved residential housing 'blocks' at access gateway] (Maurepas Way [A3] / B2150 / Retail Access / MDA Access Junction), and;
- London Road (Maurepas Way [A3] / London Road [A3] / Hulbert Road Junction)

There is a significant degree of approved development in this locality, namely the Taylor Wimpey & Grainger MDA mixed use developments, and the Sainsbury's Stores Ltd. Development of the Salvator Caetano site. All of these developments are expected to significantly increase road traffic on the local road network, and have been assessed as likely to have a significant negative impact on local air quality.

Access roads to each of these development sites falls both to the North & South of the access points for the proposed BAE development (Elettra Avenue and Silverthorne Way), and as such, any additional traffic generated by the redevelopment of the BAE site will necessarily increase volumes on the same local roads as these committed developments.

It is appropriate therefore to consider air quality as a material planning consideration of this development. The Council's Environmental Health Officer has no objection to the proposal in principle, he would require an appropriate traffic & transportation assessment to be undertaken that accounts for the predicted traffic flows generated from committed developments (namely Wimpey & Grainger MDA traffic, and Sainsbury's net traffic increases), with the aim of considering the impact upon sensitive local receptors (in particular, those described above).

In the event that a significant increase in local air pollution is identified that is either directly attributable to the proposed development, or attributable to the proposed development in combination with the other committed local developments; a contribution toward air quality management would be sought by means of a Section 106 Agreement - the required timing of which does not allow the completion of an air quality assessment to be dealt with following the granting of a planning consent (i.e. by condition).

It is therefore essential that the assessment* is undertaken at the pre-application stage, and submitted as supporting documentation.

[- i.e. appropriate traffic & transportation (T&TA) assessment, and quantitative air quality assessment based upon the T&TA figures.*

Noise

The Council's Environmental Health Officer has concerns over the proposal on the grounds that there is likely to be a detrimental loss of amenity, if not nuisance caused to residential properties along Hambledon Road due to odour from the proposed drive-thru restaurants. I have sought advice on whether 1No. drive through would be more acceptable. I have been advised that this may be less of a problem if it was centrally located within the site. However, either scenario would require justification that the development would not affect residential properties. Detailed information must be submitted with the application regarding equipment proposed to suppress and disperse fumes and/or smells produced by cooking and food preparation.

Similarly, he is concerned about the potential impact of noise from air conditioning and ventilation systems, refrigeration plant, etc at the various units and particularly ventilation/extraction systems at the restaurants. It is considered that any application includes an acoustic consultant's report detailing an assessment of the existing noise climate and the measures that would be necessary for the control of noise emanating from the site to ensure

that there is no loss of amenity to residential properties along Hambledon Road, and the development does not contribute to the problem of creeping background noise level.

Community Involvement

I would advise you to present your proposal to the Waterloooville Community-led Planning Forum. Please contact me if you wish to find out more details. I would also encourage you to attend a Development Consultation Forum. The Forum is a meeting held in public, where you are able to explain proposals directly to Councillors, the public and key stakeholders at an early stage about a development site. The process is designed to assist you to deal properly with important issues and to reduce delay and frustration on everyone's part in the formal planning process. The charge of a Development Consultation Forum is £1500.

Conclusion

It is considered that some proposed uses are more acceptable in policy terms than others for reasons set out above. There are no policy objection to the B1c/B8 units; the hotel could be justified in policy terms as it complements the business offer at the Brambles; the linked restaurant would in turn serve the hotel. However, it is likely that the proposed supermarket and drive through restaurants would have an adverse impact on Waterloooville Town Centre and are therefore contrary to Core Strategy policy CS4 and PPS4 policy EC16 and should be refused under policy EC17 of PPS4.

I would encourage you to take these comments on board to inform the uses and layout of the site. Once the layout has been revised, I would be happy to consider it further and continue to work with you towards delivering a high quality scheme on this site. Please note that the above comments are the opinion of an individual Planning Officer and are in no way binding upon the Council when determining an application for planning permission and nor will they prejudice the outcome of any application submitted.

Yours faithfully

A handwritten signature in black ink, appearing to read 'C. D. Murray'.

Mr Chris Murray
Service Manager (Planning Development)