



Our ref: JH/BC11006

Your ref: APP/11/01433

21 November 2011

Lucy Howard
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Public Service Plaza
Havant
PO9 2AX

Dear Lucy

**179 LONDON ROAD WATERLOOVILLE
PLANNING POLICY RESPONSE**

Further to your consultation response of 2 November querying aspects of the application in relation to retail policy, I would like to respond to the concerns you have raised.

Sequential Assessment

The Sequential Assessment was carried out in September 2011, directly prior to the submission of the application, and is as up to date as it can feasibly be. It comprehensively reviews all available commercial properties in and adjacent to both Waterlooville town centre and Cowplain district centre, and you have confirmed that there are no further properties that you believe we should have included in our search. The Assessment identifies 18 vacant premises in Waterlooville town centre, but almost all of them are lock up shop units which are simply too small to accommodate a convenience store format, even having regard to the requirement of Policy EC15 of PPS4 for operators to demonstrate flexibility in the scale of their format.

You have referred to a particular vacant site in Waterlooville town centre, the Curzon Rooms. We have been aware of this property throughout the planning and design process, and have been in regular contact with the selling agent, Hughes Ellard. The position is:

- The premises are vacant because the site is not viable in its present form

- Nathaniel Lichfield and Partners' Town Centres, Retail and Leisure Study in 2009 identifies the site as a redevelopment opportunity
- The consent granted in 2008, for redevelopment of the site for ground floor retail with 14 flats above, did not attract investment and has lapsed
- The owners of the site are about to conclude a deal to sell the site for redevelopment

The attached note from Hughes Ellard sets out the position. The most optimistic timescale is that in two years the site may be available for retail occupation, assuming the following sequence of events: plans for a viable scheme are drawn up; planning permission is granted; there is sufficient confidence in the market to justify building out the scheme; the completed scheme includes a retail unit which is suitable for a convenience retailer. It seems clear that a site which will not be ready for occupation for two years at the earliest, assuming positive market conditions, cannot be regarded as available within a reasonable period of time as required by Policy EC15 of PPS4.

I would add that even if the deal fell through and the premises were refurbished – which for the reasons outlined by Hughes Ellard is highly unlikely to happen – the site is not attractive to a convenience store since the format relies on on-site or adjacent on-street customer parking. Whilst Policy EC15 requires operators to consider the scope for reduced or reconfigured car parking areas (criterion iii) it does not advocate flexibility to the point of nil parking, which is all that the site currently provides.

You refer to the former HSBC Bank at 35 London Road, Cowplain, as being available. As our Sequential Assessment demonstrates, the premises comprise 175 sq m in total (see enclosed photograph), compared to the application requirement of 380 sq m; and the ground floor is less than 100 sq m, as opposed to the 250 sq m ground floor shown in the application proposals. No amount of format flexibility, as recommended by Policy EC15 (criterion i), will fit a convenience store format into these premises.

Impact Issues

You point out that the Nathaniel Lichfield Study refers at paragraph 13.11 to “limited potential for further convenience goods floorspace within the Borough”. I would make two points:-

- As the reference is to “limited potential”, the implication is that there will be instances where additional convenience floorspace is justified
- Consent has been granted recently for convenience floorspace, such as the recent permission at 158 Hart Plain Avenue in Waterlooville, bearing out the expectation that there is potential for additional convenience floorspace

Paragraph 13.23 of the Nathaniel Lichfield Study indicates that “some form of development may be appropriate in smaller centres, if there are localised areas of deficiency . . . local centres/parades within the main towns should primarily serve walk-in catchment areas approximately 500 metres from the centre”. There is a gap of some 1.3 km between Waterlooville and Cowplain town centres with no local centre in between; consequently residents living in the area in between the two centres do not have easy access to top-up shopping. The area immediately around 179 London Road comprises a motor sales business, a public house and a church, and is the closest thing to a local parade between the two centres (and is comparable to 158 Hart Plain Avenue, which lies within a small cluster of businesses serving a local catchment, but is not defined as a local centre). Whilst the distance from the site to Waterlooville town centre is slightly less than 500m, the roundabout at the northern edge of the high street presents a significant barrier to pedestrians and hence constrains access to the town centre.

We firmly believe that the proposed store will complement the existing hierarchy of centres by meeting a local need which these centres cannot serve. The small scale of development (less than 1/5 of the threshold of 2,500 sq m at which Policy EC14 requires an impact assessment) strongly suggests that the scheme will have a negligible impact on the two centres. We note that no impact issues were raised in connection with 158 Hart Plain Avenue.

Sunday Trading

You have referred to the store as “quite sizeable”, and indicated that it is outside the definition of a small shop in the Sunday Trading Act 1994. I enclose a copy of Chapter 20 of the Act, the Schedules of which define a “large shop” as one with a “relevant floor area” exceeding 280 sq m, relevant floor area being defined as the internal floor area excluding any parts not used to serve customers or to display goods; in other words, the net sales area. The net sales area of the proposed convenience store is 220 sq m (out of a total ground floor area of 250 sq m) which is well below the threshold of a large shop.



BREEAM Standards

You have indicated that the proposal must meet BREEAM Standard 'very good', which is applicable to stores of more than 500 sq m. As the proposal is for a store of 380 sq m, it would be helpful if you could confirm the BREEAM Standard which is applicable, if any.

I trust that we have dealt with all the queries raised in your response; but if there are further areas where you require clarification we will be pleased to assist.

Yours sincerely

JEREMY HEPPPELL

Enc – Letter from Hughes Ellard in regard to the Curzon Rooms; photograph of HSBC 'for sale' board; excerpt from Sunday Trading Act 1994

Cc Aaron Wright, Havant Borough Council
Richard Scutt, London Road Limited