260, 270 & 280 Bartley Wood Business Park Planning Statement

Prepared by Barton Willmore LLP on behalf of XLB Property Ltd

June 2021



260, 270 & 280 Bartley Wood Business Park

Planning Statement

Prepared by Barton Willmore LLP on behalf of XLB Property Ltd

Project Ref:	31937
Status:	Final
Issue/Rev:	1
Date:	25 June 2021
Prepared by:	Paul Reeves
Checked by:	Paul Newton
Authorised by:	Paul Newton

Barton Willmore LLP 7 Soho Square London W1D 3QB

Tel: 020 7446 6888 Ref: 31937/A5/PR/PN

Fax: 020 7446 6889

Email: paul.newton@bartonwillmore.co.uk Date: 17 June 2021

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.

CONTENTS

1.0	INTRODUCTION	1
2.0	CONTEXT OF THE APPLICATION	4
3.0	PRE-APPLICATION ADVICE AND CONSULTATION	8
4.0	PROPOSED SCHEME	11
5.0	RELEVANT PLANNING POLICIES AND GUIDANCE	13
6.0	PLANNING ASSESSMENT	17
7.0	CONCLUSIONS	33

1.0 INTRODUCTION

- 1.1 Barton Willmore has prepared this Planning Statement on behalf of our client, XLB Property Ltd ("the Applicant") in support of a planning application submitted to Hart District Council ("the Council") seeking full planning permission for the redevelopment of Buildings 260, 270 and 280 Bartley Wood Business Park.
- 1.2 Full planning permission is sought for:

Demolition of existing buildings and redevelopment of the site to provide industrial units (Flexible Use Class B2/B8/E(g)(i)-(iii)) and 1No. foodstore (Use Class E(a)), together with associated parking, a new vehicular access off Griffin Way South, landscaping and other associated works.

- 1.3 The underlying priority for this application is to regenerate a large previously developed employment site which has been vacant for some time. Despite extensive efforts to market the existing office buildings, they remain vacant due to a steady and long-term decline in demand for office floorspace in this location. The buildings are dated and are approaching the end of their economic life.
- 1.4 Upon careful analysis, it has been established that a significant investment would be required to bring the buildings up to the modern standards required to be attractive to tenants, and that such investment is unlikely to bring the rate of return needed for the development to be viable.
- 1.5 As a result, complete redevelopment of the site is considered to be the more sustainable and beneficial option. The applicant's scheme aims to maximise employment opportunities, and to provide a greater range of employment types in this location to ensure the longevity of the development proposed and in turn about more public benefits. In addition to the traditional employment floorspace which makes up the majority of the scheme, the development also includes an Aldi foodstore which will complement the wider development by offering an alternative source of employment and by providing an amenity/convenience to workers on the business park.

BENEFITS OF THE PROPOSED DEVELOPMENT

1.6 The applicant recognises that the most successful and sustainable form of development is that which integrates successfully with the surrounding area and maximises the benefits to the local community.

- 1.7 In this case the proposed development will:
 - Bring a large and vacant site, which is of strategic importance to the District, back into active use;
 - Redevelop the site in a way which will provide a more sustainable mix of employment use, allowing the site to be used for industrial purposes, storage and distribution, offices or research and development uses;
 - Ensure that the site will continue to be safeguarded for employment use despite
 extant consents for residential use, and will provide the Council with the
 opportunity to introduce suitable planning controls to ensure the long-term
 protection of this Locally Important Employment Site;
 - Provide a carefully considered and sympathetic design that will reflect and enhance the local vernacular;
 - Provide new floorspace which has been designed to be adaptable and capable of subdivision or amalgamation, helping to support business growth or new business occupation over time;
 - Provide further diversification through the provision of a new retail foodstore, which will generate alternative forms of employment;
 - Provide new buildings which are designed to be as energy efficient as possible, achieving BREEAM 'Very Good' and EPC 'A' ratings; and
 - Generate a significant number of new job opportunities.

STRUCTURE OF THIS REPORT

- 1.8 The remainder of this report is structured as follows:
 - Section 2 describes the application site and context;
 - Section 3 outlines the pre-application discussions taken place;
 - Section 4 outlines the nature of the proposed development;
 - Section 5 outlines relevant planning policies and guidance;
 - **Section 6** sets out the planning assessment; and
 - **Section 7** concludes the statement.

SUPPORTING DOCUMENTS

- 1.9 In addition to this Planning Statement, the application is supported by:
 - Completed planning application form;
 - · Completed ownership certificates;

- · Completed CIL additional information form;
- Site Location Plan;
- Existing and Proposed Plans, Sections and Elevations;
- EIA Screening;
- · Planning Statement;
- Retail Statement;
- Economic Benefits Infographic;
- · Design and Access Statement;
- Transport Statement;
- Travel Plans;
- Flood Risk Assessment;
- Ecology Assessment;
- Arboricultural Impact Assessment;
- Land Quality Assessment;
- · Phase 1 Land Contamination Assessment;
- BREEAM Pre-assessment;
- Energy and Renewable Energy Statement;
- Noise Impact Assessment;
- · Air Quality Assessment; and
- Lighting Strategy.
- 1.10 Read together the documents provide a comprehensive overview of the applicant's scheme, demonstrating its acceptability in planning and technical terms.

2.0 CONTEXT OF THE APPLICATION

2.1 This section provides a description of the site, its history, and any relevant planning permissions or other planned infrastructure improvements in the area.

SITE AND SURROUNDINGS

- 2.2 Bartley Wood Business Park is situated to the south of Hook town centre, in the heart of the Blackwater Valley. The Business Park is less than 1 mile from the M3 (Junction 5 via the B3349 and Hook Railway Station is located approximately 700m from the site. The application site is situated in a strategic location on the southeastern fringe of Hook, with junction 5 of the M3 nearby.
- 2.3 The Park was originally developed by Crest Nicholson in 1990 comprising 14 office buildings totalling approximately 55,741sqm of floor space across the wider 17ha site. Bartley Wood has traditionally been considered as an office headquarters location; however the office market has changed in recent years with occupiers wanting to be located in more vibrant locations offering a mix of support facilities and amenities to help attract and retain staff. As a result, the Business Park has been in steady decline.
- 2.4 The site extends to of approximately 3.9 ha within the business park, containing three vacant three storey office buildings known as 260, 270, and 280 which were formerly occupied by Virgin Media Ltd. These buildings occupy a prominent position fronting Bartley Way and Griffin Way South (B3349) which serves as the main access road through the Park.
- 2.5 Five predominantly three-story office buildings are located to the north of Bartley Way and the railway line further north, which separates the Business Park from Hook's southern residential area. The land rises from Bartley Way towards the railway line which is on a raised embankment with mature landscape screening either side.
- 2.6 To the east the site is bordered by an existing landscape buffer which incorporates a number of mature trees.. The landscape buffer is on a raised bund and there are elements of retainment along this boundary as the existing site is at a lower level to Holt Lane. Bartley Heath Nature Reserve runs parallel to the landscape buffer along with open farmland and Holt Farm and a handful of residential properties which are located to the northeast of the site.

- 2.7 To the south of the site there is a mature tree line which is bordered by the Bartley Heath Nature Reserve which consists of heathland and is designated as a site of Special Scientific Interest. The M3 is located further to the south on the other side of the heathland.
- 2.8 The A3349 Griffin Way South runs along the site's western boundary. The site is dissected by runs an existing ditch and a row of mature trees which runs north to south across the site. The remainder of Bartley Wood Business Park is located further to the west of the site, on the other side of the Griffin Way South, primarily consisting of office buildings and an office to residential conversion. Further to the west on Osbourne Way there are industrial and retail uses.
- 2.9 The adjacent properties primarily consist of three storey office buildings, with elevations consisting of brickwork and curtain walling, pitched slate roofs with stone clad feature entrance areas. Buildings 260, 270 and 280 are typical of their time, highly stylised and as a consequence have a very dated appearance.
- 2.10 The Site is located in Flood Zone 1 as confirmed by the Environment Agency Flood Risk Map and therefore has a low probability of flooding.
- 2.11 The Site is not located within a Conservation Area nor does it contain or is in close proximity to statutory or locally listed buildings.
- 2.12 The Site does however contain a number of Tree Preservation Orders which have been taken into account in the emerging proposal.

RELEVANT PLANNING HISTORY

- 2.13 This section outlines the relevant planning history of the application site, and any other permissions in the surrounding area which should be taken into account when assessing this application.
- 2.14 The Site has a relatively limited planning history, the most relevant and recent of which is summarised below.
- 2.15 Planning permission for the existing office buildings was granted in November 1992.

 Outline Planning Permission was granted on the Site for the erection of B1 business space to form Phase Two of the Bartley Wood Business Park (LPA Ref: HDC/20860).

Detailed approval was granted permission for Buildings 260 and 270 under Reserved Matters Application (LPA Ref: 98/00850/REM) on 30th October 1998.

- 2.16 At the time of construction, office floorspace was categorised in planning terms as Use Class B1(a) under the Town and Country Planning (Use Classes Order) 1987 (as amended at that time).
- 2.17 Since then, various amendments have been made to the legislation, the most notable of which came into effect on 1 September 2020. The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 included a substantial change in the arrangement of uses classes, particularly with the introduction of new Use Class E, covering commercial use.
- 2.18 In addition to office use, this new category includes a variety of uses including retail, the sale of food and drink, financial and professional services, sports and recreation uses, health facilities, nurseries and day centres. Unless restricted or prohibited by any existing planning condition or legal obligation, floorspace can be changed from one Class E use to another, without it amounting to development and without it requiring planning permission.
- 2.19 In the context of this site, the effect of this new legislation is that office use on the site now forms part of Use Class E and, in the absence of any planning conditions, the existing floorspace can be converted to any other Class E use without necessarily requiring planning permission. This change is in line with the Government's intention to allow greater flexibility for commercial floorspace (ie less need for planning permission resulting in lower periods of building vacancy), and ultimately this new flexibility extends to floorspace within the Council's Locally Important Employment Sites.
- 2.20 There is also the potential to convert the existing office buildings to residential use. There is an extant prior approval (Ref: 18/02748/PRIOR) to convert Buildings 260 and 270 and to provide up to 122 residential units between the two buildings. There is a separate prior approval (Ref: 19/00344/PRIOR) to convert Building 280 into residential use to provide 81 residential units. Overall, the is the potential to provide 201 residential units within the application site.
- 2.21 Both permissions are subject to the provision of Suitable Alternative Natural Greenspace ('SANG) land before any permitted development rights can be

implemented. Despite this, the prior approval remains extant and its implementation remains possible. The loss of the existing Class E(g)(i) office floorspace could therefore happen without the need for planning permission. This must be given weight in the determination of this planning application. That the loss of employment floorspace has been accepted and therefore the principle of the less of employment land in this location must be considered acceptable in principle. The benefit of this scheme, over any potential residential scheme, is that it is employment-led and is consistent with the Council's aspirations for this site and will help to lessen the impact of other residential conversions within the Locally Important Employment Site.

2.22 In light of the above, one major benefit of the proposed development is that it proposes the continued use of the site for employment use, and provides the Council with an opportunity to put any new controls it deems relevant and necessary to the long-term protection of the site for employment use.

3.0 PRE-APPLICATION ADVICE AND CONSULTATION

3.1 This section outlines the discussions and consultations that have taken place prior to the submission of this planning application.

PRE-APPLICATION DISCUSSIONS WITH THE COUNCIL

- 3.2 The development proposals have been informed by formal pre-application advice provided by the Council following a series of submissions, discussions, meetings, and written advice.
- 3.3 A preliminary scheme was discussed at a meeting on 17 July 2020 and written advice received on 19 August 2020. A second round of pre-application advice was later discussed at a meeting on 6 May 2021 and further written advice provided on 8 June 2021. The comments provided by the Council has been considered, and the design of the proposals amended accordingly.
- 3.4 The development proposals were well received, with the Council noting that:
 - There is full support for the provision of employment-related uses, namely the Flexible Use Class B1/B8/E(g)(i)-(iii) element of the proposals.
 - The general density and layout of the site appears to be appropriate and should accommodate all anticipated vehicle movements and manoeuvres throughout the site.
 - The height of the proposed buildings is consistent with that of the surrounding business park.
 - The architectural design and materiality of the proposed buildings would add visual interest to the character and appearance of the business park.
 - The potential noise and visual impacts of the development on neighbouring residential properties would need to be considered as part of any planning application.
- 3.5 The Council also provided the following suggestions for any planning application which comes forward:

- The architectural design of any buildings proposed should create a with a sense
 of place that encourages and promotes walking and cycling, and should integrate
 meaningful landscaping which supports outdoor breaktime areas for employees,
 cycling/pedestrian connections to the locality and provides buildings with a
 distinctive character.
- Given the Council's declaration of a climate emergency, the Council consider it particularly important for schemes to comply with Policy NBE9 and to reduce energy consumption through sustainable approaches to building design and layout. Any future planning submission should be accompanied by a sustainability strategy which demonstrates that the development of the scale proposed would incorporate renewable energy/ low carbon energy technology and would not only contribute to reduce CO2 emissions but also to produce renewable energy to satisfy/partly satisfy the development's demand.
- Notwithstanding the retail justification already provided during pre-application discussions with the council, any planning application would need to be supported by a detailed retail assessment covering the sequential and impact tests defined by the NPPF.

PRE-APPLICATION CONSULTATION WITH STAKEHOLDERS

- 3.6 In addition to the advice sought from the Council, feedback has also been sought from members of the public.
- 3.7 Due to the ongoing Covid-19 pandemic, XLB deployed alternative methods of consulting the community regarding the proposals for the development, which negated the need for face-to-face contact, whilst still ensuring a robust consultation. Community newsletters were therefore distributed to 2,017 residential and commercial addresses in February 2021, offering neighbouring residents, businesses, and stakeholders details of the initial proposals, while a separate newsletter to nearby businesses was distributed in April 2021.
- 3.8 During the consultation period, a total of 275 feedback responses were received via feedback postcards and emails. A total of 78% were fully supportive of the proposals, with a further 8% supportive with some minor reservations about the scheme. Overall support for the scheme totals 86%. The main concerns related to (1) the total number

of supermarkets within Hook, and (2) the potential traffic impact of the development. Despite these reservations, public support for the Aldi store was high, with it being the most common comment in support of the overall scheme.

- 3.9 In addition to consulting members of the public, the Applicant also sought to engage with local councillors.
- 3.10 A full overview of engagement is set out in the submitted Statement of Community Involvement, and within this Planning Statement. In addition to this, the Applicant will continue to engage with the local community. An information hub has been set up to provide ongoing updates in relation to the application and to direct members of the public to the Council's own consultation portal. The website, which will be hosted at https://bartleywood.consultationonline.co.uk/ will include a copy of the submitted plans for ease of reference and will provide advice on the ways in which residents, business and stakeholders can provide further feedback.
- 3.11 Through this pre-application consultation with the Council and with members of the public, it is considered that the development proposals are well-considered and represent the most appropriate use for the site. The application itself is well supported by a robust set of documents and drawings which will demonstrate full compliance with all relevant aspects of the development plan.

4.0 PROPOSED SCHEME

4.1 Planning permission is sought for:

Demolition of existing buildings and redevelopment of the site to provide industrial units (Flexible Use Class B1/B8/E(g)(i)-(iii)) and 1No. foodstore (Use Class E(a)), together with associated parking, a new vehicular access off Griffin Way South, landscaping and other associated works.

OPPORTUNITIES PRESENTED

- 4.2 Following a period of long-term vacancy, it has been established that the cost of refurbishment, and likely rate of rental income would fail to justify any further investment into the existing buildings. Redevelopment of the site is therefore deemed to be appropriate, and the proposed scheme has been prepared based on market evidence and formal pre-application advice from the Council.
- 4.3 The focus of the scheme moves from office-led development to a range of buildings better suited to industrial or warehouse-type development, which is deemed to be more viable in this location. This change will be further supported by the provision of a new retail foodstore, which will offer a greater diversification of employment types, and will act as an amenity for local businesses. Aldi have already committed to operating the store on site.

QUANTUM OF DEVELOPMENT

- 4.4 The application proposes a total of 12,212sqm of new employment floorspace. The units themselves will range from 923sqm to 1,900sqm and will be constructed in a way to allow further variation/adaptation in the future. Any such changes would require planning permission, but ultimately the ability to alter the building fabric ensures the long-term appeal and sustainability of the site for employment purposes.
- 4.5 Permission for the employment floorspace is being sought on a speculative basis, however the use and scale of the development is being led by advice from commercial agents. Being located along the M3 corridor, the site benefits from ease of access, the proximity of the local employment catchment and being part of the wider estate. As such there is expected to be a strong demand for B2/B8/E(g) uses. Whilst a flexible permission is being sought to ensure mass-market appeal, the scheme is expected to

be let at a 45:50:5 split, at 45% Industrial and Office uses (B2/E(g)), 50% storage and distribution uses (B8) and 5% ancillary trade.

- 4.6 In addition to the traditional employment floorspace proposed, the scheme includes provision for a new 1,963sqm gross retail foodstore, to be operated by Aldi.
- 4.7 Overall, the development proposes an 80:20 split between 'traditional' employment uses and the retail food store, which will continue to generate its own form of employment, both on site and through the wider supply chain. As is the case with the retail sector, these jobs are likely to be fulfilled by locally. This diversification is considered key to the long-term sustainability of the site.

ACCESS, TRANSPORT AND PARKING

- 4.8 The development will be supported by sufficient transport infrastructure. The proposed layout includes a new access point of Griffin Way, which will take over as the primary point of access, with existing points on Bartley Way aiding circulation through the site for all vehicle types and sizes.
- 4.9 The scheme will include dedicated off-street car and cycle parking for each of the proposed units. A total of 347 parking spaces will be provided, including 19 accessible spaces, and a total of 90 cycle parking spaces.
- 4.10 The development also includes dedicated off-street loading and unloading areas for each unit and the provision of Electric Vehicle charging points.

SIGNAGE

4.11 No signage is proposed at this time however, the design of the proposed development includes areas for advertisements and signage to be introduced by each tenant. Any advertisements will be sought via separate application(s) for advertisement consent.

5.0 RELEVANT PLANNING POLICIES AND GUIDANCE

5.1 This section identifies the relevant planning policies and guidance. The proposals are then assessed against Section 6 which follows.

National Planning Policy Framework (NPPF)

- 5.2 The National Planning Policy Framework (NPPF) was published in February 2019 and sets out the Government's objectives for achieving sustainable development.
- 5.3 Paragraph 11 of the NPPF states that decisions should apply a presumption in favour of sustainable development. For decision taking, this means approving development proposals that accord with an up-to-date development plan without delay.
- 5.4 Section 6 (Building a Strong, Competitive Economy) sets out the framework for supporting local business. Paragraph 81 states that planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration. It states that policies should also be be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.
- 5.5 Section 7 (Ensuring the Vitality of Town Centres) sets out the retail planning framework. In relation to this type of scheme and location, paragraph 86 requires a 'sequential test' to be applied to planning applications for main Town Centre uses not in a Centre and not in accordance with an up-to-date Development Plan. This requires an assessment of Town Centre, edge-of-centre, then out-of-centre locations. For edge and out-of-centre schemes, preference should be given to accessible sites well connected to the Town Centre and requires applicants to demonstrate flexibility in terms of format and scale. It should be noted that the term 'Town Centre' also applies to District and Local Centres in the NPPF.
- 5.6 Paragraph 89 requires an impact assessment for development which is over a locally set floorspace threshold (or the default threshold of 2,500 sqm gross in the absence of a locally set threshold) outside of Town Centres and not in accordance with an upto-date Local Plan and should assess the impact on:

- existing, committed and planned public and private investment in a Centre(s) in the catchment area of the proposal; and
- Town Centre vitality and viability, including local consumer choice and trade in the Centre and wider retail catchment.
- 5.7 The sequential and impact assessment against the NPPF tests is detailed in the Retail Assessment submitted in support of the applicant.

STATUTORY DEVELOPMENT PLAN

- 5.8 The Town & Country Planning Act 1990 states that a Local Planning Authority must have regard to the provision of the Development Plan and other relevant material considerations when considering a planning application for planning permission. The Planning and Compulsory Purchase Act 2004 defines the development plan as the spatial development strategy (or SDS) and the development plan documents (taken as a whole) which have been adopted or approved in relation to that area.
- 5.9 In this instance the Development Plan applicable to the Site is as follows:
 - Adopted Hart Local Plan 2016-2032 (HLP32)
 - Saved Policies of the Hart District Local Plan (Replacement) 1996-2006 (HDLP 06)
 - Hook Neighbourhood Plan 2018-2032 (HNP)

Adopted Hart Local Plan 2016-2032 (HLP32)

- 5.10 The plan acknowledges that sustainable economic development is a key element of national planning policy and applies the NPPF's presumption in favour of sustainable development (Policy SD1).
- 5.11 One of the key objectives is to maintain and where possible support economic diversity. It directs new employment use to the Strategic Employment Sites or Locally Important Employment Sites (SES and LIES respectively), before considering other brownfield and, in exceptional circumstances, greenfield land (Policy ED1). In the context of a LIES designated area, any proposals which involve the loss of traditional employment use (now catagorised as Use Classes B2, B8 and E(g)), would need to demonstrate that there are no strong economic reasons to retain the employment use, that market signals indicate the site is unlikely to be utilised for employment use, or the replacement use is of a similar character employment use (Policy ED2).

- 5.12 In respect of retail uses, the Plan designates a series of town, district, and local centres. These centres are areas where retail uses should be directed to in the first instance, in line with NPPF requirements (Policy ED4). Proposals for main town centre uses (as defined within the NPPF) which are not within one of these designated centres will be required to satisfy the sequential test and, for larger retail developments exceeding 1,000sqm, an impact assessment is also required.
- 5.13 The Plan also sets out advice and criteria for assessing the quality of design. New development is expected to respect and wherever possible enhance the special characteristics of the District, and to avoid adverse impacts upon visual amenity, natural and historic features (Policy NBE2). Schemes should also aim to conserve and enhance biodiversity wherever possible (Policy NBE4), and to prevent new development from affecting the risk of flooding on-site or elsewhere (Policy NBE5).
- 5.14 All developments should seek to achieve high quality design and positively contribute to the overall appearance of the local area. The Plan sets out what must be taken into account to ensure good design, including respect and integration into the surrounding built environment, the need to reduce energy consumption, and the need to avoid harm to the amenity of neighbouring land uses (Policy NBE9). In this respect, the impacts of ground pollution, noise, air and light pollution must also be assessed (Policy NBE11).
- 5.15 New development must also assess the level of infrastructure available in the surrounding area, and if required make appropriate provisions for improvements both on and off the application site (Policy INF1). Transport and the need to promote the use of sustainable modes of transport is of particular importance (Policy INF3), and new development should aim to prioritise walking and cycling wherever possible.

Saved Policies of the Hart District Local Plan (Replacement) 1996-2006 (HDLP06)

5.16 A number of policies within the HDLP06 have now been replaced by the HLP32 referred to above, however a number of policies remain in force. The saved policies set out further criteria for assessing the quality of design (Policy GEN1), the need to avoid unnecessary harm to trees of significant landscape value (Policy CON8) and to maintain and prevent obstruction to the existing network of Public Rights of Way (Policy CON23).

Hook Neighbourhood Plan 2018-2032 (HNP)

- 5.17 Whilst it is not a statutory requirement to do so, Hook Parish Council has developed a Neighbourhood Plan which was adopted on 27 February 2020 and is now given weight in the determination of planning applications in the area. The Plan emphasises the need to focus new growth within the existing settlement boundary of Hook Village (Policy HK1) and to respect and where possible enhance the landscape character of the area (Policy H5).
- 5.18 The Plan aims to protect local residents from adverse impacts of light and noise pollution (Policy HK8) and provides further criteria on what constitutes good design (Policy HK12).
- 5.19 In employment terms, the Plan aims to protect against the loss of any employment floorspace, unless it can be demonstrated that it is no longer viable (Policy HK15). This policy welcomes the regeneration of existing employment sites where it would not detrimentally impact on the amenity of neighbouring occupiers.
- 5.20 The Plan also aims to manage the impact of transport infrastructure, requiring it to be well integrated and to prevent it from dominating the public realm (Policy HK10).

Policy conclusions

5.21 This review together with the pre-application discussions outlined at Section 3 of this report have identified the key planning issues which must be addressed by the proposed scheme. These include the need to maintain as much employment floorspace as possible within the LIES, and to adapt to changing market demand before other, non-employment uses should be considered. The proposed development aims to do exactly this, by providing a series of units which will be built to meet the standards required by prospective occupiers, and by prioritising alternative land uses which also generate employment opportunities for local residents. The remainder of this statement will outline the way in which the proposed development is compliant with planning policy and sets out any other material considerations which must be taken into account.

6.0 PLANNING ASSESSMENT

6.1 This section assesses the proposed development against the relevant policies set out within the Development Plan, applying appropriate weight to any other material planning considerations.

PERFORMANCE OF THE EXISTING SITE

- 6.2 Whilst the three buildings making up the application site are relatively new constructions, having been built around 1990, all three are vacant.
- 6.3 Each building has been actively marketed by commercial agents Hollis Hockley, and have been marketed by others previously. The Hollis Hockley report, submitted in support of this application, outlines the various issues presented by the existing buildings, the wider site and the wider market.
- 6.4 The report concludes that Hook has suffered a material decline as an office location over the past five years, and as a result, Bartley Wood Business Park is now over 70% vacant. The poor performance of the park is considered to be due to a general oversupply of office space along the M3 corridor, and that the park is less attractive when compared to other sites, due to the quality of office floorspace provided, and a distinct lack of local amenities in the surrounding area.
- 6.5 The possibility of refurbishing the Site has been reviewed. To bring the park up to a competitive standard, it is considered that an investment of approximately £18.6 million would need to be spent and, unfortunately, this investment would return only a minimal increase in the Estimated Rental Value (ERV) of the office floorspace on site.
- 6.6 The low level of return on investment cannot be justified, hence why a complete redevelopment of the park, including the diversification of uses, is needed for the Site to be attractive moving forward.

CONTEXT OF THE APPLICATION SITE

- 6.7 According to the policies map, the Site forms part of a wider designation, demarcating a 'Locally Important Employment Site' (LIES). The Bartley Wood Business Park forms one of at least 14 other LIES within the District. Policies ED1 and ED2 of the HLP32 indicate that such areas are set aside to contribute towards meeting the future economic growth needs of the District.
- 6.8 Continuing to provide employment and employment-generating retail uses in this location will ensure compliance with the spatial strategy for new employment uses, as set out in Policy SS1 of the HLP32, and the aim to focus new growth in/around Hook to be located within the Village settlement boundary, as required by Policy HK1 of the HNP.
- 6.9 Policy ED2 requires designated LIES to be protected for 'B-Class' uses. It should be noted that, since the adoption of the Local Plan, there have been a number of changes to the Use Classes order. As a result of The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 and the recatagorisation of some uses classes, reference within the Local Plan to 'B-Class uses' should be taken as:
 - Use Class B2 general industrial use;
 - Use Class B8 storage or distribution use;
 - Use Class E(g)(i) office use;
 - Use Class E(g)(ii) research and development use; and
 - Use Class E(g)(iii) industrial processes.
- 6.10 For ease of reference, this report shall refer to the above as 'employment use'.
- 6.11 The remainder of Policy ED2 sets out the nature of the protection in place. In cases where planning permission is required, the change of use or redevelopment of land and buildings within LIES will only be supported where certain requirements are met. These requirements will be referred to at relevant points within the remainder of this document.
- 6.12 Ultimately, it can be demonstrated that the majority of the proposed development (namely, the provision of new buildings for employment use) is compliant with Policies SS1, ED1 and ED2, and any departure from Policy ED2 (namely, the provision of a

retail foodstore) is compliant with the exceptions set out within the policy and can therefore be justified. The development is therefore compliant in this respect.

PRINCIPLE OF REDEVELOPMENT

- 6.13 Given the current market conditions, the application proposes a change of use away from the existing office use. When assessed against Policy ED2, nine of the ten buildings proposed on site (12,212sqm of the 14,175sqm proposed, or 86% of floorspace) are to be used for employment use deemed compatible with the LIES and with Policy ED2. The vast majority of the development is therefore in full accordance with this policy.
- 6.14 One of the buildings (1,963sqm of the 14,175sqm proposed, or 14% of floorspace) is to be used as a retail foodstore. Whilst this use will generate a form of employment on site, Policy ED2 and the support text states that such uses are 'town centre uses' which fall outside the definition of 'employment use' in this context.
- 6.15 For a change of use from offices to retail foodstore to be accepted, compliance with Policy ED2 Parts (a) and (b) must be satisfied. It must be demonstrated that (a) there are no strong economic reasons to retain the employment use, and (b) that market signals indicate that the site is unlikely to be utilised for employment use.
- 6.16 The supporting text within the HLP32 provides an indicative list of the evidence required to support proposals for non-employment uses within LIES. This should include marketing evidence which demonstrates the site has been marketed at a reasonable value for at least six months with no sustained or viable interest from prospective buyers or tenants.
- 6.17 At a neighbourhood plan level, Policy HK15 states that employment sites may be regenerated where the development would not detrimentally impact on the amenity of adjoining occupiers, and the loss of any employment floorspace must be justified with marketing evidence for at least 12 months, a broader requirement than that set out within to Local Plan.
- 6.18 Compliance with Policy ED2 Parts (a) and (b), and Policy HK15 is demonstrated by the Hollis Hockley report. This confirms that, under current ownership, the site has been actively marketed for more than 12 months (via a number of different marketing campaigns) and shall continue to be marketed over the course of the application. It

also confirms that there is a history of the site having been steadily marketed by previous owners and tenants over a longer period, and that this decline has continued regardless.

6.19 It is therefore clear that there are no strong economic reasons to retain the existing employment use, and that the redevelopment of the site provides the optimum amount of alternative employment use deemed to be viable on the site. Market signals demonstrate that the remaining capacity of the site is unlikely to be utilised for traditional employment use, and therefore its conversion to retail use is justified. Such a use will continue to generate a form of employment and will contribute to the local economy of the district. The development is therefore justified under the requirements of Policy ED2 of the HLP32 and Policy HK15 of the HNP.

PRINCIPLE OF RETAIL USE

- 6.20 The scheme is supported by the provision of a new retail foodstore, which will be operated by Aldi.
- 6.21 Having established that there is a need for diversification on the Site, this next section looks specifically at the appropriateness of a retail use in this location. Overall, the development proposes an 80:20 split between 'traditional' employment floorspace and the retail foodstore floorspace, which will continue to generate its own form of employment. This diversification is considered key to the long-term sustainability of the site.
- 6.22 According to the National Planning Policy Framework (NPPF), retail development falls within the definition of a 'main town centre use'. Paragraph 86 states that main town centre uses should be located in Town Centres, and out-of-centre locations should only be considered if suitable sites are not available. This is referred to as the Government's 'town centre first' policy or approach.
- 6.23 Paragraph 86 requires the Council to apply a sequential test to planning applications for main town centre uses such as that proposed.
- 6.24 This requirement is implemented via Policy ED4 of the HLP32, which confirms that Proposals for main town centres uses that are not in the defined centres will need to satisfy the sequential test.

- 6.25 According to the Policies Map, the Site is located outside of Hook District Centre, but is located approximately 600 metres from the designated boundary in a direct line, and approximately 1.1km via pedestrian routes. Whilst this is a walkable distance from the District Centre and Hook Train Station, it falls outside the NPPF's definition of an 'edge of centre' site, and the Site must therefore be considered an 'out of centre' location.
- 6.26 A detailed Sequential Site assessment is submitted in support of this application and concludes that of the potentially sequentially preferable sites identified, none are suitable or viable to accommodate the Aldi store even with flexibility in format is considered.
- 6.27 In addition to the sequential test, Paragraph 89 of the NPPF also requires the Council to apply an Impact Assessment if the development is over a proportionate, locally set floorspace threshold. According to Policy ED4 of the LP32, the threshold for an Impact Assessment is for any development proposing 1,000sqm or more of retail development in edge or out of centre locations.
- 6.28 Accordingly, a detailed Retail Assessment is submitted in support of the application, and concludes that:
 - The proposed tenant Aldi operate a distinct business model which differentiates the retailer from other mainstream foodstore operators in the area, including Tesco. As such it is considered that the proposed store will contribute towards increasing overall choice and competition in the Hook area, in a manner which will complement existing stores (and the proposed new Sainsburys).
 - Having considered alternative, more central sites, it has been demonstrated that
 there are no sequentially preferable locations which are suitable and available to
 accommodate the proposed foodstore, even allowing for flexibility in approach.
 The Application Site therefore represents the only realistic opportunity to
 accommodate Aldi's longstanding requirement and to harness their investment in
 the area.
 - The proposed foodstore (in addition to the new Sainsbury's) will contribute towards improving the overall foodstore offer within the Hook area. The proposed store will also provide a key amenity and benefit for the wider Business Park, something which is currently lacking in the area. Such provision is expected to

have a positive impact on the overall attractiveness of both existing and the proposed new employment floorspace within the area. This is turn will help to bolster the overall viability of the Business Park as a key employment location moving forwards.

- It has been demonstrated that the proposed foodstore will not have a significant adverse impact on investment in Centres. It is recognised that the scheme will draw some trade from existing Centres, however, the level of trade diversion and impact on town centre vitality and viability is considered to be within acceptable levels and would not be classed as 'significant adverse' against the NPPF impact tests.
- 6.29 It can therefore be concluded that the retail aspect of the proposed development is compliant with the NPPF and Policy ED4 of the HLP32.

DESIGN APPROACH

- 6.30 Policy NBE9 of the HLP32 requires new development to achieve a high quality design and to positively contribute to the overall appearance of the area. The policy is supported by Policy HK12 of the HNP. Both policies set out a number of criteria which form the basis of the summary below:
 - The scheme recognises and builds upon the visual character of the area and its designation as a Locally Important Employment Area, by maintaining a functional and commercial appearance.
 - The scheme provides a range of unit sizes which provide a good degree of choice for prospective tenants, and the construction of the buildings allow for future changes where needed (and subject to separate planning permission, if required).
 - As new build constructions, the proposed buildings are designed to be as efficient
 as possible. The proposed scheme goes above and beyond basic requirements,
 and is expected to achieve BREEAM 'Very Good' rating. The business units will
 aim to further exceed this if possible and are targeting BREEAM 'Excellent' rating.
 - The scheme incorporates a range of high-quality materials which complement each other and the character of the surrounding area, whilst remaining sufficiently robust to maintain that appearance over the years to come.

- The scheme will be served by an appropriate amount of car parking, whilst
 ensuring that there is adequate pedestrian access and sufficient cycle parking
 and Electric Vehicle charging to encourage other more sustainable modes of
 transport.
- Sufficient loading bays and manoeuvring spaces are provided to ensure that commercial goods vehicles can access and egress the site without issue.
- The design and layout of the scheme avoids any adverse impact upon the surrounding area.
- The redevelopment of the site provides the opportunity for a new landscaping scheme which provides better distinction between public and private spaces, as well as a better distinction between pedestrian and vehicular traffic routes.
- A high-quality scheme of soft landscaping is proposed, maintaining existing and established landscaping buffers where possible, and maintaining a comparable amount of tree cover across the site.
- 6.31 Overall, it can be concluded that the proposed development is of a high quality which is consistent with the design aspirations of Policy NBE9 of the HLP32 and Policy HK12 of the HNP. Details of the sustainability and energy efficiency measures proposed are detailed in the separate section below.

LANDSCAPING AND TREES

6.32 The site is bordered to the south and west by woodland and belts of trees. Within the site, trees are mainly the result of planting carried out when the site was originally developed. However, there is a belt of older trees including oak, field maple and ash alongside the stream running north-south through the site. These trees are protected by a Tree Preservation Order.

- 6.33 Policy NBE2 of the HLP32 requires development to respect and wherever possible enhance the special characteristics, value or visual amenity of the District's landscapes. This is supported by Saved Policy CON8 of the HDLP06 that requires new development to avoid any impact upon trees woodlands or hedgerows where possible, and to include mitigation measures (such as replacement planting) where removal is deemed to be necessary. Policy HK5 of the HNP requires landscaping schemes to respect and where possible enhance the characteristics of the area.
- 6.34 An Arboricultural Impact Assessment has been prepared and submitted in support of the application. Following a detailed inspection of the trees onsite, the development proposals have been prepared according to which trees can or should be removed due to their condition or location.
- 6.35 Whilst a number of trees will be removed as part of the redevelopment of the site, these are all trees which formed part of the original 1990's development, and formed part of a landscaping plan which was complementary to the position of built development which was part of that scheme. Due to the change in building footprints, the removal of these trees is necessary, and an appropriate amount of replacement planting is proposed as part of the works.
- 6.36 The Arboricultural Method Statement sets out a recommended set of protection measures for retained trees and concludes that the impact of the development should be deemed acceptable in Arboricultural terms. Further assurances, including further protection measures and supervision during the proposed works can be secured by way of a suitably worded planning condition, if necessary.
- 6.37 On the basis of the above, the proposed development can be deemed compliant with Policy NBE2 of the HLP32, Saved Policy CON9 of the HDLP06 and Policy HK5 of the HNP.

ACCESS, TRANSPORT AND PARKING

6.38 Policy INF3 of the HLP32 requires new development to promote the use of sustainable transport modes, and to provide appropriate access and parking to avoid any adverse impacts upon the surrounding area. This is supported by the interim parking standards and by Policies HK9 and HK10 of the HNP.

- 6.39 Located within Parking Zone 1 (the area within 500m of Hook Train Station), the development should be expected to provide a maximum of 1 car parking space per 60sqm of employment use (assuming Class B2/E(g)(ii) as the 'worst-case', or most intense demand of the various uses proposed), and a maximum of 1 space per 14sqm of retail foodstore.
- 6.40 Cycle parking should also be provided at a minimum of 1 space per 150sqm of employment use and 1 space per 125sqm of retail foodstore.
- 6.41 Compliance with these requirements is outlined within the table below:

Car Parking:

Use	Amount	Maximum	Provision
Employment	12,212sqm	Max 203.53	213
Foodstore	1,963sqm	Max 140.21	134
Total	14,175sqm	Max 343.74	347

Cycle Parking:

Use	Amount	Target	Provision
Employment	12,212sqm	Min 81.41	82
Foodstore	1,963sqm	Min 15.70	8
Total	14,175sqm	Min 97.11	90

SUSTAINABILITY

Policy NBE9 requires new development to reduces energy consumption through sustainable approaches to building design and layout, such as through the use of low-impact materials and high energy efficiency. The policy does not require any specific sustainability credentials to be achieved, but since adoption of the plan, the Council have declared a climate change emergency.

A detailed Energy Strategy has been prepared and submitted in support of the application, and the sustainability credentials of the development should form a material planning consideration compared to the existing buildings on site. Whilst the Development Plan does not specify any requirements with regard to energy or sustainability, the proposed development aims to comply with Criterion 1-3 of the Building Regulations Part L2A 2013, and the developer's own aspirations to achieve BREEAM 'Very Good' and EPC 'A' ratings. This is considered to be the most achievable outcome for the development; however, it is dependent on credits scored throughout the design process, and the Applicant will aim to improve on this wherever possible, targeting BREEAM 'Excellent' for the employment units.

- 6.43 In addition, the scheme includes various energy efficient measures, including efficient window glazing, reduced air permeability (ie less need for heating), solar heat gain control (ie less need for air conditioning) and energy efficient lighting. Photovoltaic panels will be installed on the roof of the employment units and a process refrigerant heat recovery system will be installed within the proposed foodstore. This utilises the heat generated by refrigerator systems and utilises it to heat the wider building, in addition to the Air Source Heat Pumps proposed.
- 6.44 Overall, it should be concluded that the scheme utilises all feasible and viable energy efficient measures on site and the scheme is therefore compliant with Policy NBE9.

FLOOD RISK AND SURFACE WATER DRAINAGE

- 6.45 Policy NBE5 of the HLP32 supports new development where it would not increase the risk of flooding over the lifetime of the proposed use and encourages major forms of development (such as that proposed) to incorporate Sustainable Drainage Systems (SuDs) where possible.
- 6.46 A Flood Risk Assessment has been prepared and submitted in support of this application. It notes that the proposed development is classed as a less vulnerable form of development and that the Site is situated within Flood Risk Zone 1, where there is a low risk of Flooding. On this basis, the report concludes that the sequential test for development in terms of flood risk has been met, and that the proposed development is appropriate for this location. The report also concludes that the proposed development does not pose any increased risk to the Site or surrounding area.
- 6.47 The drainage strategy is to discharge foul water into the existing private sewers which connect onto an existing public sewer to the north of the site. The system for surface water drainage has been designed to cater for storm events up to 1 in 100 year and accounts for up to 40% climate change. Further information regarding this drainage strategy can be found within the report.
- 6.48 Based on the above information, it can be concluded that the scheme is compliant with Policy NBE5 of the HLP32.

POLLUTION

- 6.49 Policy NBE11 of the HLP32 requires development to avoid generating, or being subject to, unacceptable levels of pollution. Where development is proposed on or near a site that may be impacted by, or may give rise to, pollution, such a proposal must be accompanied by an assessment that investigates the risks associated with the site and the possible impacts on the development, its future users and the natural and built environment. The assessment shall propose adequate mitigation or remediation when required to achieve a safe and acceptable development.
- 6.50 The following sections of this report will consider the potential impacts of ground, air, noise and light pollution.

GROUND CONTAMINATION

- 6.51 To examine the potential impacts of ground contamination, a Desk Study Report has been prepared and submitted in support of this application. It concludes that, based on the available information, there is considered to be a negligible-to-low risk of contamination. The report goes on to make a number recommendations which should be implemented during the construction phase of the development, to identify and mitigate against any areas of localised contamination. Such precautions can be secured by way of a suitably worded planning condition.
- 6.52 On the basis of the above, any potential issues of ground contamination can be managed appropriately, and compliance with Policy NBE11 can be demonstrated over the course of the development.

AIR POLLUTION

6.53 To examine existing air quality levels, and to assess the potential impacts of the development, an Air Quality Assessment has been prepared and submitted in support of this application. The report assesses the overall pollutant concentrations of nitrogen dioxide (NO2) and particulates (PM10 and PM2.5) at nearby existing sensitive receptors. The potential air quality impacts of the development have been assessed on the basis of the findings of detailed dispersion modelling using Breeze Roads GIS

Pro Version 5.1.8, which has been undertaken in the context of relevant NAQOs, emission limit values and relevant guidance.

- 6.54 The air pollutant concentration modelling has identified that there will be negligible increases in nitrogen dioxide concentrations and negligible increases in particulate matter concentrations at existing sensitive receptors as a result of the development scheme. There are no existing sensitive locations which will exceed the AQO, as a result of the proposed development. Accordingly, air quality impacts of the proposed development scheme are considered to be acceptable.
- 6.55 On the basis of the above, compliance with Policy NBE11 can be assured.

NOISE POLLUTION

- 6.56 Policy HK8 of the HNP requires new development to mitigate against excess levels of noise and to keep any impacts to a minimum.
- 6.57 To examine existing levels of noise, and to assess the potential impacts of the development, a Noise Impact Assessment has been prepared and submitted in support of this application. It concludes that:
 - There would be no significant adverse impact upon noise-sensitive residential uses in the surrounding area;
 - There would be no increase in the levels of ambient noise at nearby nonresidential uses;
 - There would be a small, negligible increase in traffic noise; and
 - Based upon the outcome of the assessment, no specialist mitigation measures are required beyond standard best practice for the proposed land uses.
- 6.58 On the basis of the above, compliance with Policy HK8 can be demonstrated and any on-going risks can be managed appropriately.

LIGHT POLLUTION

- 6.59 The redevelopment of the site will require new external lighting to be installed. Policy KH8 of the HNP aims to ensure that any development which requires external lighting to demonstrate that the impacts of light pollution can be minimised. Accordingly, a detailed lighting strategy has been prepared and submitted in support of the application, and considers the efficiency of the lighting proposed, and the potential adverse impacts artificial lighting could have on neighbouring amenity and biodiversity.
- 6.60 By positioning the buildings along the south and eastern boundaries of the site, any external lighting at the front of the buildings (where lighting is most required) is offered a degree of screening by the buildings themselves. Where lighting is required at the rear of the buildings, and adjacent to Hook Common and Bartley Wood woodland, lighting will be low-wattage, directional and offered additional screening by fencing. This approach will avoid unnecessary disturbance to local wildlife.
- 6.61 All lighting has been selected on the basis that it is 'night-time friendly', in that the design of the luminaires shield the light source to prevent any upward lighting (ie 'light pollution') and to obscure the light source itself, reducing glare.
- 6.62 On the basis of the above, the chosen lighting scheme prevents any light-based pollution being generated by the site. Any residual risk can be managed through the responsible maintenance of the equipment during the operational phase of the development. Compliance with Policy NBE11 can therefore be demonstrated.

RESIDENTIAL AMENITY

- 6.63 Policies NBE9 and NBE11 of the HLP32, together with Policies HK8 and HK12 of the HNP require new development to avoid any adverse impacts upon residential amenity. The above sections, together with the supported documents referred to therein, have demonstrated that there would be no adverse impacts upon neighbouring residents by way of ground contamination, air, noise or light pollution.
- 6.64 The design of the proposed development also avoids any adverse impact upon privacy, outlook, daylight or sunlight, primarily due to the location of the site. Position at the

south-eastern edge of the village, most residential dwellings are situated to the north, around 140 metres from the northern-most boundary of the Site. However, a small number of dwellings are located to the east, approximately 25-100m from the Site. The layout of the proposed development, including the placement of the buildings facing away from these properties, including the lack of any windows or doors on the rear elevation (except emergency escapes) help to avoid any impact upon the amenity of these properties. The existing landscaping buffer ensures that there will be no visual intrusion upon these properties.

6.65 On the basis of the above, compliance with Policies NBE9 and NBE11 of the HLP32, together with Policies HK8 and HK12 can be demonstrated.

ECOLOGY

- 6.66 Policy NBE2 of the HLP32 requires new development to avoid adverse impact upon important local, natural and historic features, such as trees, woodlands, hedgerows and water features and their function as ecological networks. This is supported by Policy NBE4, which sets out further requirements for the protection of biodiversity. Further considerations are set out at a neighbourhood plan level, through Policy HK4.
- 6.67 The potential ecological impacts of the development have been thoroughly considered. A Preliminary Ecological Appraisal has been produced and submitted in support of the application, and concludes that:
 - The site is not subject to any statutory or non-statutory designations from an
 ecological perspective. The closest statutory site is Hook Common and Bartley
 Heath SSSI located adjacent to the south of the site and the survey area does
 not support any features that contribute to the designation of this site;
 - The habitats on-site consisted of buildings, hardstanding, hedgerow, broadleaved woodland, running water, standing water and trees;
 - The site has potential to support breeding birds, reptiles, otters, and water voles.
 A precautionary approach to the potential for breeding birds, otters, and water voles to be on-site is recommended;
 - It has been recommended that the site is enhanced by introducing some compensatory planting and installing bat and bird boxes; and that

- Such mitigation measures can be enforced by way of a suitably worded planning condition if required.
- 6.68 Based on the above information, it can be concluded that the scheme is compliant with Policies NBE2 and NBE4 of the HLP32, and Policy HK4 of the HNP.

ADVERTISEMENTS

6.69 No advertisements are proposed at this time, however the design of the proposed development includes areas for advertisements and signage to be introduced by each tenant. Any advertisements will be sought via separate application(s) for advertisement consent.

PLANNING OBLIGATIONS AND CONDITIONS

- 6.70 The Applicant recognises that new development may need to be supported by financial contributions and other obligations which may be sought by way of a Section 106 legal agreement. The applicant will enter into discussion with the Council over the course of the application and will agree to any obligations deemed reasonable and necessary.
- 6.71 The Applicant recognises that any works to the public highway, outside of the redline boundary of the Site will be secured by way of a Section 278 legal agreement.
- 6.72 The Applicant also recognises that further details or controls may be required, following the grant of planning permission. The Applicant is willing to accept any conditions deemed reasonable and necessary, however we ask the Council to review the full suite of supporting documents, as effort has been made to provide as much information as is possible at this stage. This has been done with a view to minimising the number of pre-commencement conditions. To ensure that any details reserved by condition can be processed as efficiently as possible, we ask that the Council outline the draft wording of the conditions, prior to determining the application.
- 6.73 This approach ensures that there is sufficient infrastructure to demonstrate compliance with Policy INF1 of the HLP32.

SUMMARY

6.74 This report has demonstrated compliance within individual policies of the Development Plan and, in doing so, has demonstrated that the scheme is in compliance with the Council's general policy for development, as set out in Saved Policy GEN 1 of the HNP.

7.0 CONCLUSIONS

7.1 This Planning Statement has been prepared in support of an application for full planning permission on behalf of XLB, seeking permission for:

Demolition of existing buildings and redevelopment of the site to provide industrial units (Flexible Use Class B1/B8/E(g)(i)-(iii)) and 1No. foodstore (Use Class E(a)), together with associated parking, a new vehicular access off Griffin Way South, landscaping and other associated works.

- 7.2 The redevelopment and diversification of uses on the site is deemed necessary to appeal to changing market demand and to bring this long-term vacant site back into active use. Without it, the site will continue to remain vacant and there will be increased pressure on other employment sites to cater for these alternative uses.
- 7.3 This Planning Statement has demonstrated compliance with all relevant aspects of the development plan. The primary use of the site as flexible B1/B8/E(g)(i)-(iii) floorspace is consistent with the policy aspirations of the Local Plan and the designation of the site as a Locally Important Employment Site. The provision of a retail foodstore is also justified as a means of alternative employment, as an amenity for local workers, and as a convenience to the wider community.
- 7.4 The need for the development is being used to secure the optimum use of the site.

 The scheme will provide numerous planning benefits, including:
 - Bring a large and vacant site, which is of strategic importance to the District, back into active use;
 - Redevelop the site in a way which will provide a more sustainable mix of employment use, allowing the site to be used for industrial purposes, storage and distribution, offices or research and development uses;
 - Ensure that the site will continue to be safeguarded for employment use despite
 extant consents for residential use, and will provide the Council with the
 opportunity to introduce suitable planning controls to ensure the long-term
 protection of this Locally Important Employment Site;
 - Provide a carefully considered and sympathetic design that will reflect and enhance the local vernacular;

- Provide new floorspace which has been designed to be adaptable and capable of subdivision or amalgamation, helping to support business growth or new business occupation over time;
- Provide further diversification through the provision of a new retail foodstore,
 which will generate alternative forms of employment;
- Provide new buildings which are designed to be as energy efficient as possible, achieving BREEAM 'Very Good' and EPC 'A' ratings; and
- Generate a significant number of new job opportunities.
- 7.5 As the scheme is considered to be policy compliant and there are no material planning considerations which suggest that planning permission should not be granted. The proposals constitute a sustainable form of development and, in accordance with the NPPF, planning permission should be granted without delay.