

Deputations Received Items 5a and 5b

HAVANT BOROUGH COUNCIL
PLANNING COMMITTEE
9 September 2021

I am now able to enclose, for consideration by the Planning Committee on 9 September 2021 , the following supplementary planning information that was unavailable when the agenda was printed.

Agenda No	Item	
5a	APP/20/01127 - Mill Rythe Holiday Village, 16 Havant Road, Hayling Island	1 - 2
	Proposal: Application for full planning permission, pursuant to APP/16/01237, for the redevelopment of the holiday site including the demolition of redundant chalets, use of land for the siting of 112 holiday caravans with areas of open recreational space, cease the use of the land for pitch and putt purposes and retain the remaining pitch and putt area as a managed wildlife area including the provision of an ecology bund & ditch, landscaping, the siting of three bird hides with bat roost in their roof spaces and a mown 'circular wildlife walkway'.	
	Additional Information	
5b	APP/21/00200 - 32 New Lane, Havant	3 - 12
	Proposal: Demolition of existing buildings and redevelopment of site comprising erection of distribution warehouse (class B8) with ancillary offices and related facilities, vehicle storage deck, new access, landscaping and associated infrastructure.	
	Additional Information	

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Away Resorts – Written deputation

Planning Committee on 09 September 2021 5pm

Item 5a - APP/20/01127 - Mill Rythe Holiday Village

Members of the Planning Committee,

My name is **Carl Castledine**, Chief Executive of Away Resorts Ltd, the Applicant.

The application seeks to amend a previous planning permission granted under APP/16/01237 which allowed the siting of holiday caravans, refurbishment of the existing holiday chalets and a number of other works for the modernisation of the holiday park. However, despite our efforts, we have not found an economically viable way to convert the remaining chalets to a standard sufficient to provide the level of accommodation expected holiday makers in the 21st century.

Therefore, we seek members approval for the demolition of the remaining chalets and their replacement by holiday caravans of appropriate materials and colours that would be less visible from the harbour. As with the previous application, lighting will also be controlled to prevent dark sky pollution and nuisance to neighbouring properties. In replacing the two-storey chalets with one-storey caravans the proposed development will have less impact on views from and across the harbour AONB.

In order to ensure the viability of our plans to transform this aging holiday park through major investment in the accommodation and holiday facilities (as already approved), this proposal also seeks a slight increase in the total number of holiday units by 18. We understand that the small increase in caravans will be encroaching upon our former pitch and putt course which has been designated as a SINC, we therefore propose to repurpose the remainder of the former course as a dedicated nature reserve with a range of wildlife protection and landscape enhancement measures to create a net bio-diversity gain. In addition, we are happy to pay a contribution of £125,000 to mitigate any potential ecological impacts on the wider ecology of the harbour area.

I therefore hope that Members of the Planning Committee will support us in enabling the modernisation of this outdated holiday park to support the wider social and economic well-being of the local community whilst reducing the visual impact of the existing facility and providing a net-biodiversity gain through on-site and off-site measures.

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Deputation from Mr Comlay

If, after consideration of the points raised, you have a predisposition for how you might vote on this application, then **barring a deep dive into the conflicting traffic data**, you could be minded to approve. The promise of a significant number of jobs on a vacant site in need of regeneration could be too tempting to refuse. The Regeneration Strategy identified this type of logistics business as one which should be encouraged, albeit at Southmoor, where there is already an appropriate outline application at Brockhampton West, or at Dunsbury Park, where a competitor has already wisely set up.

You are deciding whether to site a high volume traffic generating business in an employment area surrounded by residential streets and properties, with three primary schools and three NHS facilities within one kilometre distance. Access to the trunk roads essential for its commercial traffic is heavily constrained and often gridlocked.

‘Last mile delivery’ is a misnomer. The applicant’s data shows that 95% of the schedule-critical deliveries leaving the site will need to fight their way to the A27 or the A3M in order to service destinations from Winchester to Worthing, and to Woking in the north. Residents of the surrounding streets know just how difficult this can be and the proposed occupier would very soon find out.

The ‘proposed occupier’ has provided their **definitive** daily traffic movements in an **easily missed but critically important** single page appendix. All subsequent predictions are derived from this source, creatively but inconsistently embellished to mask the fact that the base data does not match the occupier’s 24/7 3 shift operating model.

The definitive source shows 2,415 daily vehicle movements, a number robustly defended as matching the company’s proposed business model for the site. For **commercial** vehicle movements, it possibly does. The fundamental flaw is that there is no evidence in the definitive source for the **personal** vehicle movements of staff associated with the proposed shift pattern. At peak capacity, with 600 shift workers and 866 van drivers, the traffic analyst’s own projection of 72% private car use should show over 2,000 staff vehicle movements in the daily trip generation data, including a clearly observable peak at the overnight shift handover. However, between 11 pm and 1 am, the data shows just **8 HGVs** and **1 car**.

The note from the Transport Consultant published August 26th take an eleventh-hour step of moving the entire shift pattern forward by one hour to attempt to explain the missing night shift arrival numbers, leaving the evening shift departures still unaccounted for. A subsequent ‘clarification’ seen on Sept 6 remains confused.

The Trip Generation data in the Transport documentation has been reworked multiple times during the last six months, acknowledging inconsistencies in previous presentations, but still failing to obscure the fundamental flaw with the ‘proposed occupier traffic data’ which remains the definitive source.

It is worth noting that the Environmental Health consultee has also commented on the ‘fluidity of the traffic estimates’, observing that ‘they have demonstrably varied with time’.

Government guidelines demand that Trip Generation data for planning purposes should include all vehicle movements associated with an application. When staff vehicle movements are accounted for, the traffic movements at the three site gates will far exceed the 2,415 quoted and you must recognise that all of that traffic must traverse a heavily used footpath and a strategic cycle lane.

The lack of convincing evidence of the accounting for staff personal vehicle trips represents a fundamental and significant error in the information given to the committee,

Two weeks ago, Basingstoke council was forced to revoke its planning consent for an Amazon warehouse after a legal threat by Dummer Parish Council which challenged the legality of the decision, based on what it considered to be **an error in the information given to the committee.**

The Committee Report before you notes that *“there remain a number of clarifications being sought from the applicants Transport Consultant”*. A vote to approve this application before the information given to you is unambiguously clarified would be a decision taken at significant risk.

The Constitution advises that you *“come to your decision only after due consideration of all of the information reasonably required upon which to base a decision. If you feel there is insufficient time to digest new information or that there is simply insufficient information before you, request that further information. If necessary, defer or refuse.”*

For your own sake, as the Planning Committee, you should defer. For the town’s sake, you should refuse.

Deputation regarding Planning Application APP/21/00200 32 New Lane, Havant, PO9 2NG

From Mr Stephen Golding 119 Nutwick Road PO9 2UQ

I have already made comments to the planning application as follows but would like to ensure that the planning committee takes them into account

Comments Made

My wife and I are resident in Nutwick Road which is situated across the railway line at the back of the New Lane site. We are retired and enjoy the frequent use of our rear garden.

We anticipate that we will be adversely and severely affected by the proposed development in two main respects.

Demolition and Building Phases

We have already suffered a prolonged period of noisy and dusty demolition and rebuilding some 12 years ago or so when the original Wyeth site was redeveloped and do not look forward to experiencing this yet again.

On-going Noise Nuisance and Light Pollution

We anticipate this could be a big problem and this is a major concern for us. Lorries would be constantly reversing into the proposed loading bays with their reversing alarms sounding. Likewise there will be similar alarms and engine start-ups from the van storage/parking area at the rear of the site.

On the question of light pollution we are concerned that 24-hour security lighting will be lighting up our bedroom windows when ideally we should benefit from the natural light cycle.

Before any approval please will the Council scrutinise the application carefully to ensure that mitigation measures in the plans are sufficient with regard to noise and light pollution and will be strictly adhered to. In particular please ensure that lighting is limited and directed and that all sound barriers and fencing provided will adequately protect us and other residents of Nutwick Road from noise nuisance.

Objection based on Increased Congestion

As a resident of Havant affected by continually increasing road traffic throughout the borough often to the point of congestion I question the wisdom of the siting of the proposed facility. A better place would surely be near to a major road network junction. Please bear in mind that if this plan were to be approved the considerable extra vehicle movements through our town will be incurred every day for years into the future. It is important to make a proper decision on something as big as this right from the outset.

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I ask that Councillors making the decision think critically about the data in the application and refuse permission based on insufficient vehicle movement data and lack of detail on the impacts of future demand and growth.

I believe the applicant has based the vehicle movements on the pharmaceutical companies' distribution centre data, the stated 2415 vehicle movements per day is grossly understated for a last-mile delivery hub which is a very different type of business.

The additional traffic will be chaotic for an already stressed town centre, the application states that there will be a 58% impact on the B2149/Park Road North roundabout. This coupled with other developments in the Havant area requires careful consideration to avoid making a bad situation worse. There should be an intelligent assessment across all planning applications to establish the overall traffic impact in the area.

In 2020, the World Economic forum predicted that the demand for last-mile delivery is expected to grow c 78% globally by 2030¹. They also suggest that ecommerce could increase vehicles on the road by 36% and result in 30% more vehicle-led emissions by 2030². In the UK, retail Ecommerce could rise from 19.2% to 53% by 2028³.

It is paramount to understand what interventions the firm plan to mitigate the impacts that future demand will have on traffic volumes. The World Economic forum¹ warn that last-mile traffic will pose severe challenges to cities in the next one to three years; you should expect these challenges to apply to Havant.

Finally, growth factors must be taken into account with this application as they will have an impact on the volume of traffic. Given that the data is potentially already understated it would be prudent to insist on the full facts in order to make an informed decision.

Shelley Saunders - Local Havant Resident and Coordinator Havant Green Party (views expressed are my own)

References

- 1 http://www3.weforum.org/docs/WEF_Future_of_the_last_mile_ecosystem.pdf
- 2 <https://thenextweb.com/news/how-last-mile-services-and-shared-mobility-can-streamlining-the-delivery-business-syndication>
- 3 <https://ecommercenews.eu/ecommerce-uk-accounts-for-53-of-retail-sales-by-2028/>

Deputation from Mr and Mrs Barlow

PROPOSED DEMOLITION AND REDEVELOPMENT
32 NEW LANE HAVANT PO9 2NG

In further objection to the proposal, this should never be considered in a residential area, it would be far better located at the top of the Hulbert road, with direct access to the motorway. Vehicles will be coming and going at all times of the day and night. Disturbance, traffic congestion and pollution would be a real concern in the new lane area, especially for nearby residents. Would this even be given any consideration at all if it was proposed for an area where council officials lived? I think not! We do not believe correct evaluation has taken place with consideration to all of the new building in the Bartons Road area, Havant town, Emsworth and forty acres at Farlington. This council grants endless permissions for these developments with not the least consideration to facilities for all the people already living in the area plus all those to occupy the new housing and commercial premises in the future. This area has become very unpleasant to live in, entertainment venues are absolutely not available locally or within easy reach. At the present time it is impossible to see a doctor in our local surgeries. Furthermore Havant and the surrounding locality is untidy, dirty and overgrown everywhere, that is not completely the fault of residents, the council has a great deal to answer for in that regard.

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Deputation Submitted on Behalf of the Applicants

Until last week, the site was occupied by Pfizer and was used as a cold chain packaging, storage and distribution facility. Prior to this, operations were associated with manufacturing of pharmaceutical products since the 1950s. The New Lane Industrial Estate is recognised as an important employment area and is safeguarded for this purpose.

Our proposals seek to redevelop the now vacant site to create a new parcel distribution centre which will deliver small parcels for onward distribution to customers in the local area.

The development has been designed to meet BREEAM 'Excellent' sustainability rating which is above existing policy requirements. The proposals include 20% active EV charging points from day one with passive infrastructure installed elsewhere to future proof the site for electric vehicles. Other measures include solar panels on the warehouse roof, ecological enhancements with tree and soft landscaping along New Lane frontage and its boundaries. The inclusion of acoustic fencing and other measures have ensured that the proposals do not give rise to amenity or air quality issues, as confirmed by Environmental Health.

The warehouse and van storage deck are positioned more centrally on the site, further away from residents to the east. The new buildings are substantially lower in height than the current high-bay warehouse and offices.

The proposals have been designed with an intended international occupier in mind. This represents an important opportunity for continued employment uses at the site by Autumn next year.

The occupier estimates that over 70 permanent on site warehouse jobs, rising up to 200 in the busiest periods will be created. There will also be flexible work and hundreds of driver opportunities. The Employment and Skills Plan will seek to maximise training and employment opportunities during the construction phases of the development for local people. This will involve local education and training establishments, with targeted media campaigns to deprived areas in the Borough.

The facilities have been designed to house the operators own vehicle fleet. This creates employment opportunities for drivers who don't have access to their own vehicles; means drivers have the ability to walk, cycle or take public transport to work and doesn't contribute to parking challenges in the local area.

The future traffic generation of the site has been the subject of extensive discussion. Through using bespoke data from the potential occupier, a more robust assessment has been undertaken than would have been using more generic data from other parcel distributors.

The data includes all staff, van deliveries and servicing by HGVs. It will operate under similar conditions to the previous distribution facility, although the dominant vehicle use will be vans as opposed to HGVs.

Hampshire County Council as the local highway authority have independently validated the traffic generation and all of the assessment work undertaken. They do not object to the proposed scheme.

The only vehicles using New Lane will be workers who live in Havant travelling to/from work and vans making deliveries to residents who live in these southern areas. 2,415 movements are expected on average daily. 2,505 daily trips were generated at the Previous Maximum Usage of the site. In more recent years this reduced to 1,950 movements. This represents an increase of 466 daily trips, albeit there will be less vehicles on the network at peak times given operational timings.

All HGVs will use Crossland Drive to travel to/from the site and only use the southern entrance into the site. This is the most direct route to the strategic road network and is sign posted.

The timings for van drivers to arrive at the site is known in advance. The logistics operation is highly sophisticated, with handheld devices being used to provide the agreed delivery routes and anticipated timings.

The site is in an accessible location and a series of improvement measures have been identified to improve the accessibility of the site:

- Improvements for pedestrians, including new crossings on New Lane/Crossland Drive
- Financial contributions of over £70,000 towards improving safety, especially for cyclists, at the New Lane/Crossland Drive junction and improving local bus stops

These improvements will have benefits for residents, including school children walking to school.

A series of operational management plans will be required once the occupier is confirmed.

As a result, we hope the Council can support the scheme in line with the officer's report.