NWS · Planning

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25 August 2026

Our Ref: 25001/KB/SS

Local Plan Pre-Submission Consultation
Planning Service
Havant Borough Council
Public Service Plaza
Civic Centre Road
Havant
PO9 2AX

Via email policy.design@havant.gov.uk

Dear Sir/Madam,

PUBLICATION BUILDING A BETTER FUTURE PLAN CONSULTATION JULY 2026
REPRESENTATIONS ON BEHALF OF XLB PROPERTY LTD

These representations have been prepared on behalf of XLB Property Ltd ("XLB"). XLB are the development manager to Havant SARL — owners of Langstone Park, Havant ('the Park'). They are a key stakeholder in the Borough and welcome the opportunity to comment on the Publication Building a Better Future Plan (July 2026), hereafter referred to as the 'Local Plan'.

Introduction and Background

Langstone Park is located to the south of Havant Town Centre separated by the Havant Bypass (A27), and to the north of Hayling Island on the western side of Langstone Road (A3023).

Since its acquisition in 2020, XLB have been proactively working with Havant Borough Council (HBC) to deliver meaningful enhancements to the Park aimed at ensuring it remains relevant to the current and future markets, attractive to occupiers and a key employment site which continues to deliver social and economic benefits to the wider Borough. This has included a package of improvement works within the existing campus (including the refurbishment of on-site amenities and new branding) alongside the delivery of new, high-quality, and sustainably constructed employment accommodation.

Full planning permission (Ref: APP/21/00405) for an initial phase of development (referred to as 'Phase 1) was originally granted in August 2021. This involved the creation of an additional 11,290 sqm of employment space across 4No. units. This Phase is now complete and leased to companies in the Biotech, Engineering and Defence sectors, typically from the surrounding area.

In December 2023, outline planning permission (Ref: APP/22/00172) was granted for the comprehensive redevelopment of the wider Park (beyond Phase 1), which has potential to replace existing, outdated accommodation with up to 52,000 sqm new, modern employment floorspace over a 10-year period. Following the approval of reserved matters in 2024, construction works commenced on Phase 2 comprising 3No units within the south-eastern corner of the Park, Phase 2 has now reached practical completion and the new units are in the process of being let. Most recently, a reserved matters application for Phases 3A/3B

has been submitted for the Council's approval (Ref: APP/26/00496). Phases 3A/3B involve the phased delivery of a further 5No. flexible employment units within the central portion of the Park.

The development of further phases under the outline permission will be subject to future reserved matters submissions in due course.

Previous Representations

Historically XLB has actively participated in the Local Plan making process having made representations to the previous draft Local Plan (subsequently withdrawn), the initial consultation on the Building a Better Future Plan in 2022 and the Draft Plan consultation in May 2025. With respect to the latter, the representations sought amendments to Allocation 30 Langstone Park (now Allocation 28) and Policy 38: Protecting Employment Uses (now Policy 44). A copy of the May 2025 representations is included in **Appendix 1** for ease of reference.

Current Representations

Allocation 28: Langstone Park

XLB continue to strongly support the inclusion of Langstone Park as an Employment Allocation (now Allocation 28) which appropriately recognises the important contribution of the Park to the local economy. We also welcome those adjustments to the policy wording under Allocation 28 which have responded to our previous representations.

Whilst it remains our view that reference to the various planning permissions which have been granted in recent years would provide helpful context as to how the Park is envisaged to grow and change over the Plan period, it is accepted that this context is not necessary to make the Policy sound. However, the Policy should acknowledge that these planning permissions (Ref: APP/21/405 and APP/22/00172) together allow for up to 63,290 sqm of employment floorspace to come forward within the Park. It is therefore important that any floorspace references within the Policy correctly reflect this position.

It is also noted that additional criteria have been included within the list of Development Requirements. We do not raise any objection to the inclusion of the additional criteria although we would seek the following adjustments to ensure that the policy is consistent with National Policy, provides sufficient flexibility, and avoids unnecessary duplication (including with reference to maintaining existing trees).

Accordingly, the 'Development Requirements' section under Allocation 28 should be amended as follows (changes shown in **bold**):

Development Requirements

~~***The site is allocated for employment development including around 49,000 sqm of floorspace.***~~ *Planning permission will be granted where proposals:*

a) ***seek to A****avoid areas at risk of flooding and demonstrate that development will be safe for its lifetime without increasing flood risk elsewhere;*
b) *Incorporate surface water management systems which restrict runoff to below the pre-development rate of flow;*
c) *Allow for the occupation of development to be phased to align with the delivery of sewerage infrastructure,* ***as required****;*
d) *Provide a landscape buffer to the Lavant Stream corridor;*
e) *Provide native-led landscaping taking into account local distinctiveness and conservation priorities;*
f) *Pursue opportunities for habitat creation/retention in accordance with the Local Nature Recovery Strategy;*
g) ***Seek to R****retain and integrate protected and notable****/mature*** *trees on site;*

h) Provide a landscape buffer to retain the character of the Public Right of Way;
~~**i) Retain all mature trees on the site to screen development;**~~
*j) Ensure future access to existing underground infrastructure**;** and*
k) Protect and enhance Havant footpaths 50 and 51.

Policy 44: Protecting Employment Uses

XLB support the objectives of Policy 44 in seeking to protect important sites within the Borough which actively contribute to the local economy, including Langstone Park. However, there is some degree of inconsistency with the policy approach to proposals which might result in the loss of employment floorspace to other uses and the supporting text at 4.430 which confirms support for other uses (such as small scale convenience retail and food and drink establishments intended to meet the needs of nearby employees) as long as they are of a scale subservient to the main employment function of the area. Such uses often help to enhance the overall attraction of employment areas to employees and where appropriate should be supported. There should therefore be an allowance within the policy wording itself for such uses to come forward as an exception criteria.

Accordingly, the following text within Policy 44 should be amended as follows (changes shown in **bold**):

Within the existing employment areas, proposals that would result in the loss of employment floorspace to other uses will be permitted where:

a) It can be demonstrated that either:

i. No reasonable offer for employment purposes has been received for sale or rent, following an active and realistic marketing exercise; or

ii. It is not financially viable to redevelop or refurbish the site for employment purposes; and

*b) The proposed use do not undermine the function and operation of the existing employment area**; or***

c) The proposal provides a complementary use that is appropriately scaled and will not be detrimental to the overall employment function of the area.

Consistency with the Policies Map

It is noted that there are some discrepancies in terminology between the Local Plan and the Policies Map. For example, Policy 44 refers to 'Existing Employment Sites' but the key on the Policies Map refers to 'Established Employment Sites'. For the purposes of absolute clarity, the references should be consistent.

It is also noted that the 'Brockhampton' Employment Area is not listed within the supporting text under paragraph 4.427 but is shown on the Policies Map. Again, for absolute clarity this omission should be addressed within the supporting text to Policy 44.

Summary

XLB continue to welcome the allocation of Langstone Park and its designation as an employment site. The designations recognise and support the important role that the Park currently plays as well as its ongoing evolution which will see the Park enhance its role, particularly within the industrial, tech and R&D sectors.

In order to ensure the policies within the Local Plan are positively prepared, justified, effective and consistent with National Policy we have proposed amendments to Allocation 28 and Policy 44 (including the supporting text). We would duly request that the Council gives consideration to these proposed changes.

25 August 2026

Yours sincerely

[redacted]

Susie Stephen
Director

[redacted]

NWS Planning Limited

Appendix 1

Stantec UK Limited
[redacted]

30 June 2025

Project: 32283/SS/PN

Local Plan Consultation
Havant Borough Council
Civic Centre Road
Havant
PO9 2AX

Via Email (policy.design@havant.gov.uk)

DRAFT BUILDING A BETTER FUTURE PLAN
REPRESENTATIONS ON BEHALF OF XLB PROPERTY LTD

These representations have been prepared on behalf of XLB Property Ltd ("XLB"). XLB are the development manager to Havant SARL – owners of Langstone Park, Havant ('the Park'). They are therefore a key stakeholder in the Borough and welcome the opportunity to comment on the Draft Building a Better Future Plan (May 2025), hereafter referred to as the 'draft Local Plan'.

Introduction and Background

Langstone Park is located to the south of Havant Town Centre separated by the Havant Bypass (A27), and to the north of Hayling Island on the western side of Langstone Road (A3023). It has previously been recognised by the Council as the largest concentration of commercial floorspace within the Borough[1].

Since its acquisition in 2020, XLB have been proactively working with Havant Borough Council (HBC) to deliver meaningful enhancements to the Park aimed at ensuring it remains relevant to the current market, attractive to occupiers and a key employment site which continues to deliver social and economic benefits to the wider Borough. This has included a package of improvement works within the existing campus (including the refurbishment of on-site amenities and new branding) alongside the delivery of new, high-quality, and sustainably constructed employment accommodation.

Full planning permission (Ref: APP/21/00405) for an initial phase of development (referred to as 'Phase 1) was originally granted in August 2021. This involved the creation of an additional 11,290 sqm of employment space across 4No. units. This Phase is now complete and leased to companies in the Biotech, Engineering and Defence sectors, typically from the surrounding area.

In December 2023, outline planning permission (Ref: APP/22/00172) was granted for the comprehensive redevelopment of the wider Park (beyond Phase 1), which has potential to replace existing, outdated accommodation with up to 52,000 sqm new, modern employment floorspace over a 10-year period. Following the approval of reserved matters in 2024, construction on the next phase of development has commenced (known as phase 2) and comprises 3No units due for completion December 2025. Interest from prospective occupiers has already been received.

[1] Paragraph 3.111, Havant Submission Local Plan (updated June 2021)

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The development of further phases under the outline permission will be subject to future reserved matters submissions in due course.

Previous Representations

Historically XLB has actively participated in the local plan making process having made representations to the previous draft Local Plan (subsequently withdrawn) and initial consultation on the Building a Better Future Plan in 2022.

With respect to the latter, the representations called for a supportive policy specific to Langstone Park similar to the approach adopted within the previous draft Local Plan, but which recognises that it's rejuvenation would be delivered over a 10-year period across a number of phases. It was also emphasised that such an approach was important to provide certainty and to harness positive on-going investment in the Park. A full copy of the previous representations is included in **Appendix 1**.

Current Representations

We set out below our response to the detailed policy wording and supportive text of those policies which are of particular relevance, in the context of our Clients' objectives and aspirations.

Policy 1: Spatial Strategy

The overarching objectives of draft Policy 1 are supported. In particular we support the recognition of the role that development allocations will play; the need for positive planning to meet local development needs (including for employment); the focus on maximising development opportunities within established urban and developed areas; and development densities which make efficient use of land and promote sustainable transport accessibility.

Policy 6: Amount of Employment

Under draft Policy 6, the Plan proposes to make provision for at least 123,750 sqm net additional employment land floorspace across the Borough (our emphasis). This includes the delivery of 99,828 sqm via site allocations. Noting that this falls below the assessed employment need for over 175,000 sqm net additional floorspace, it is important that the Council adopt a positive approach to supporting the delivery of new employment floorspace where appropriate opportunities may arise. Against this context, the inclusion of the 'at least' within the wording of draft Policy 6 is supported.

Policy 10: Supporting a Prosperous and Sustainable Economy

The overarching objectives of draft Policy 10 are supported, in particular the allocation of a range of different types and sizes of employment land and appropriate intensification, redevelopment and upgrading of existing employment sites to make a more efficient use of space and respond to modern business needs.

Policy 11: The Role of Applicants and the Local Planning Authority in Delivering Development

The provisions set out under draft Policy 11 are generally welcomed and reflect a positive approach to planning for development. In relation part f) we believe that it is important for the Council to continue to work proactively with applicants and statutory consultees to clear conditions in a timely manner to ensure that development proposals can be built out without undue delay. It is also important that the potential

need to clear a range of conditions is taken into consideration as part of any decision by the Council to impose a condition requiring commencement to take place sooner than the national standard.

In instances where legal agreements are required (e.g. s106 or s278) there also needs to be greater emphasis on working positively and proactively to complete these in a timely manner as discussions often become unduly protracted.

Allocation 30: Langstone Park

We strongly support the inclusion of Langstone Park as an Employment Allocation as this recognises the importance of the Park within the local economy.

However, we note that there is no express acknowledgement within the draft allocation of either of the notable planning permissions which have been granted to date (as set out above) which provide important context as to how the Site is envisaged to grow and change over the plan period. These permissions collectively allow for up to 63,290 sqm new, modern employment floorspace to come forward on the site, of which 11,290 sqm has already been delivered and 8,690 sqm is under construction.

Whilst the current intention is to continue to build out under the outline permission, it is important that the allocation continues to support the principle of positive development and rejuvenation of the Park.

Furthermore, having regard to the findings of the Employment Land Review (2024) and the acknowledged inability for the draft Local Plan to meet identified needs for employment floorspace, the Council should not be looking to place a 'ceiling' on the quantum of employment development which may come forward within the site allocation area. Instead, this should be capable of being determined by any future application(s), having regard to specific site constraints. Such an approach would better align with the objectives of draft Policies 1 and 10 and the approach adopted under draft Policy 6 (i.e. 'at least').

We would therefore propose the following amendments to Allocation 30 as set out below (changes shown in **bold**):

*Size (ha): **~~15.83~~ 16.3***
*Indicative yield (net): 49,000 sqm **(based on ELR assumptions)***

Site Description
*Langstone Park is located to the south of the A27 dual carriageway, to the west of the A3023 Langstone Road and to the East of Brookside Road and the Southmoor Lane Industrial Estate. The site is accessed from Langstone Road to the east and Brookside Road to the west. The site has a 'campus' appearance **having** originally **been developed as ~~forming~~** an IBM business park with extensive buildings developed in the 1970's with substantial footprints **~~and comprises a mix of age and quality of units. The buildings are~~** surrounded by extensive car parking and landscaping. **In recent years, the site has benefited from a range of enhancement measures both to the existing building stock (including refurbishment of existing accommodation and amenity space) alongside newly developed buildings on what was previously areas of extensive car parking.***

Full planning permission (Ref: APP/21/00405) granted in August 2021 has delivered 11,290 sqm of new employment floorspace within the south-eastern corner of the site. In December 2023, outline planning permission (Ref: APP/22/00172) was granted for the comprehensive redevelopment of the site to deliver up to 52,000 sqm high-quality, modern, employment floorspace. Of this, 8,960

sqm is currently under construction on the south-western corner of the site following the grant of reserved matters (Ref: APP/24/00274) in December 2024.

Key Features

- *Brownfield site*
- *Immediately adjacent to the A27*
- *Potential for protected species*
- *Hermitage stream to the east*
- *Tree Preservation Order (TPOs) on the western bank*
- *Chichester Harbour National Landscape to the south west*
- *St Faith's Conservation Area to the north east*
- *Southern part of the site at risk from tidal flooding*
- *Parts of the site at risk from surface water flooding*
- *Good accessibility to Town Centre services, facilities and public transport.*
- *Potential landfill on site*
- *Potential EIA development*
- *Principal and secondary aquifer on site*
- *Residential buildings along Brookside Road adjacent to the site*

Allocation Requirements

Development ***for additional employment (and appropriate ancillary) uses*** ~~***of about 49,000 sqm***~~ *is permitted where* ~~***proposals***~~*:*

a) Surface water risk on site is considered as part of a site specific Flood Risk Assessment
b) Surface water management systems ensure that run-off is restricted to below the pre-development rate of flow

And where proposals: ~~***Design and Layout***~~

c) Provide a landscape buffer to the Lavant Stream corridor
d) Provide native-led landscaping taking into account local distinctiveness and conservation priorities
e) Provide a landscape buffer to retain the character of the Public Right of Way
f) Avoid areas at risk of flooding wherever possible
g) ***Where possible, retain*** ~~***Retain***~~ *all mature trees on the site to screen development.*

Policy 38: Protecting Employment Uses

The designation of Langstone Park (within the wider Langstone Gate employment area) as a protected employment area is supported. Whilst the thrust of the policy is also supported (i.e. to resist the loss of employment land), it should be recognised that certain ancillary uses can be beneficial to employment areas and sufficient provision should be allowed for within the policy to recognise this and support such uses where it can be demonstrated the proposed use would not undermine the function and operation of the existing employment area. For example, at Langstone Park, existing ancillary facilities include an on-site gym, cafeteria and day nursery.

We would therefore propose the following amendments to draft Policy 38 as set out below (changes shown in **bold**):

*Development proposals that would result in the loss of established employment areas (either in full or part) will **generally** be resisted.*

Within the existing employment areas, proposals that would result in the loss of employment floorspace to other uses will be permitted where:

a) It can be demonstrated that either:
   i. No reasonable offer for employment purposes has been received for sale or rent, following an active and realistic marketing exercise; or
   *ii. It is not financially viable to redevelop or refurbish the site for employment purposes; **~~and~~ or***

*b) The proposed use**(s)** do not undermine the function and operation of the existing employment area.*

Summary

XLB welcome the allocation of Langstone Park and its designation (within the wider Langstone Gate area) as a protected employment site which recognise and support the important role that the site currently plays as well as its ongoing evolution which will see the site enhance its role, particularly within the industrial, tech and R&D sectors.

In order to ensure the policies within the Local Plan continue to support the opportunities identified at Langstone Park and for the purposes of clarity we have requested some amendments to the policy wording of Allocation 30: Langstone Park and Policy 38: Protecting Employment Uses.

We would duly request that the Council gives further consideration to these proposed changes. We would also welcome further positive dialogue with Officers moving forwards.

STANTEC UK LIMITED

Appendix 1

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VIA EMAIL (policy.design@havant.gov.uk)

32283/A3/SS/PN
14 November 2022

HAVANT BOROUGH COUNCIL LOCAL PLAN: BUILDING A BETTER FUTURE REPRESENTATIONS BY XLB PROPERTY LTD

1. We act on behalf of XLB Property Ltd ("XLB") as development manager to Havant SARL – owners of Langstone Park ('the Park') and have been instructed to submit representations in relation to Havant Borough Council's Local Plan: Building a Better Future consultation.

2. Since the purchase of the Park in 2020, XLB have been proactively working with Havant Borough Council (HBC) to combat a trend of falling occupancy levels, which are a direct result of the Site's dated (obsolete) building stock and facilities, much of which is bespoke to the original occupier (IBM) and is significantly beyond its serviceable life span. The buildings are not financially viable for refurbishment in the long term.

3. XLB are committed to driving significant inward investment into the Park (and the Borough) which is already evident through the delivery of new industrial units (approved under planning permission Ref: APP/21/00405) which are under construction and due for completion shortly. The Park is also subject to a live outline planning application (Ref: APP/22/00172) proposing the comprehensive redevelopment of the wider Park to ensure that it remains relevant to the current market, attractive to occupiers, a key employment site and continues to deliver social and economic benefits to the wider Borough.

4. The previous draft Local Plan (now withdrawn), identified the Park as one of nine Key Projects under Policy KP6. In line with subsequent 'Changes for the Inspector to consider as part of the Examination' documentation, Policy KP6 supported *'comprehensive redevelopment providing new or converted employment development with supporting uses and infrastructure'* at the Park. This policy approach, to what is a key employment site within the Borough, is fully aligned with XLB's objectives and should be carried forward through to the new Local Plan.

5. It is acknowledged that the current consultation is a 'discussion paper' exploring key issues as opposed to setting out any detailed policies or site allocations. Notwithstanding this, it is disappointing to note that there is no specific reference to Langstone Park under the 'Thriving Local Economy' section which is considered at odds with it having previously been identified as

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only one of nine 'Key Projects'. We would therefore seek confirmation from the Council that the new Local Plan will carry forward a supportive policy specific to Langstone Park moving forwards, recognising that it's rejuvenation will be delivered over a series of phases over 10 years and well into the emerging plan period. This is important to provide certainty and to harness positive on-going investment in the Park.

6. Reflecting the above, a separate Call for Sites submission has also been made to ensure that the Site's potential to contribute over the emerging plan period is not overlooked.

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SENT VIA EMAIL (policy.design@havant.gov.uk)

32283/A3/SS/PN
16 December 2020

HAVANT BOROUGH COUNCIL LOCAL PLAN: PRE-SUBMISSION VERSION WITH CHANGES (NOVEMBER 2020)
REPRESENTATIONS BY XLB PROPERTY LTD

Introduction & Background

1. We act on behalf of XLB Property Ltd ("XLB") as development manager to Havant SARL – owners of Langstone Technology Park and have been instructed to submit representations in relation to Havant Borough Council's Local Plan: Pre-submission version with changes (November 2020) ("Draft Local Plan").

2. Havant SARL has recently completed the purchase of Langstone Technology Park (LTP) which is identified as one of only nine Key Projects within the emerging Local Plan (under Policy KP6). As a result, they are now a major stakeholder in the Borough and welcome the opportunity to input into the evolution of the Plan and the emerging policy relating to the site.

3. As noted in the Local Plan, the site was originally developed by IBM in the 1970's to accommodate their UK manufacturing headquarters but since IBM left the site it has evolved into a business park providing office, laboratory, logistics and manufacturing spaces. The site provides approximately 480,000ft²/45,000m² of employment floor space, the largest concentration of commercial floor space in the Borough.

4. More recently, the occupancy levels of the park have fallen significantly to a current overall vacancy level of circa 40%. This is as a direct result of emerging competition but also the sites dated (obsolete) building stock and facilities, much of which is bespoke to the original occupier (IBM) and is significantly beyond its serviceable life span. The buildings are not financially viable for refurbishment in the long term.

5. XLB is therefore keen to work with the Council to deliver the future development and redevelopment of the Park to ensure that it remains relevant to the current market, attractive to occupiers, a key employment area and continues to deliver social and economic benefits to the wider Borough.

6. Within this context it is important that the policies within the emerging plan are sound and are positively framed to maximise the delivery of viable and beneficial development across the Borough and the associated benefits.

7. Having reviewed the emerging Plan, whilst XLB support the general thrust and Vision (set out in Section 2 – most noticeably paragraphs 2.14 and 2.16) of the Draft Local Plan, they have a number of both general and detailed comments which we set out below. In accordance with Havant Council's ('the Council') requirements, we have also completed and submitted the relevant Consultation Form.

General Comments

8. As a general point the NPPF requires Local Plans to be succinct and contain policies that are clearly written, unambiguous and avoid duplication, so that it is evident how a decision maker should react to development proposals (NPPF paragraphs 15 & 16). XLB are therefore concerned by the proposed change to paragraph 1.10 which confirms that all floorspace or housing numbers set out in the site allocations within the plan are set as 'about' rather than maximum or minimum numbers. This is confusing, provides little certainty to developers, and could lead to ambiguity in determining future planning applications.

9. XLB would prefer a position on employment allocations (specifically in relation to Policy KP6) wherein the principle of development is established through the allocation, specific site opportunities and constraints are identified but the amount of new development is not constrained within the policy wording. This would lead to detailed application proposals being supported in principle but the specific proposal (whatever the scale) being considered against the relevant development management policies of the plan to test whether it is acceptable. Such an approach would allow developers to optimise the development potential of sites (and the delivery of associated benefits) whilst allowing the detailed impacts and mitigation (if required) to be carefully reviewed and assessed. Introducing 'arbitrary' floorspace caps on employment sites, has the potential to limit the development potential of those sites and undermine the overall benefits that could be delivered, including employment numbers.

10. XLB support the changes made within the Draft Local Plan to incorporate the recent changes to planning legislation/regulations including the changes to the Use Classes Order (effective from 1 September 2020) so that they are up to date and consistent with national policy.

Detailed Comments

<u>Policy DR1 – Delivering Sustainable Development in Havant Borough</u>

11. XLB welcome the changes made through DR1-02 which suggests an uplift in the provision of employment floorspace across the Borough from 93,769 sq. m net to 149,940 sq. m net between 2016 and 2037. XLB believe that this change has been clearly justified through the updated Employment Land Review (2020) which forms part of the emerging Plans evidence base.

12. The change offers the chance for identified sites to optimise the delivery of new or repurposed employment floorspace based on current market conditions, maximising job creation and wider benefits across the Borough.

Policy KP6 – Langstone Technology Park

13. XLB further supports the Council's allocation of LTP as a Protected Employment Site (under draft Policy C1) and as a Key Project site under emerging draft Policy KP6. The site represents a sustainable location and should be retained as an allocated site for the development of a range of employment floorspace alongside complementary ancillary and supporting facilities.

14. The National Planning Policy Framework ('NPPF') sets out a presumption in favour of sustainable development. There are three dimensions to sustainable development: economic, social and environmental. The planning system is expected to contribute towards building a strong, responsive and competitive economy, support strong vibrant and healthy communities and contribute to protecting and enhancing the natural, built and historic environment.

15. The site allocation will directly contribute towards achieving the objectives of the Council's Draft Local Plan by supporting employment floorspace growth within LTP, a key employment area of the District.

16. A key theme of the draft Local Plan is to ensure continuing flexibility in the redevelopment and intensification of the Borough's established employment areas, whilst ensuring there is sufficient churn in the market for existing businesses to expand and relocate (see supporting text to Policy C1).

17. This is consistent with paragraph 80 of NPPF, which requires that planning policies (and decisions) should help create the conditions in which business can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity taking into account both business needs and wider opportunities for development. Policies should also be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances (NPPF, paragraph 81).

18. In this regard whilst XLB supports the general allocation of the site for employment uses, it does not believe it is sufficiently flexible to allow the site (and its potential redevelopment) to optimise development and its associated benefits or respond to changing economic and market conditions.

19. XLB do not support the change (KP6-02) to introduce a limitation of 12,575 sq m of additional employment floorspace. Such a change has not been justified with regard to the Plan's evidence base, nor is it consistent with the wider Draft Local Plan, which seeks to provide flexibility for the redevelopment and intensification of established employment areas (see paragraph 7.4).

20. XLB is aware that the floorspace figure within draft policy KP6 is likely to have been taken from the most recent planning permission (LPA Ref: APP/19/00703) which was granted on the site in July 2020. This sought new flexible B1c (now Use Class E), B2 and B8 use units, comprising approximately 12,575 sqm (GIA) of new floorspace within the south western corner of the site along with associated car parking and landscaping.

21. It is clear through the determination of that planning permission that the Council recognised that this was a first phase of the sites wider comprehensive redevelopment. The Officer's Report states at paragraph 7.6 that, *"whilst the development/redevelopment/refurbishment currently proposed is more modest than anticipated in emerging policy, there would be nothing to preclude a more comprehensive redevelopment coming forward at a later stage on the site. As such, the application proposals are broadly supported by both adopted and emerging policy*".

22. The inclusion of the floorspace cap (notwithstanding our comments at paragraph 7) therefore seems inconsistent with the wider aspiration to encourage the comprehensive redevelopment of the site. In addition, and importantly, the floorspace cap would not be consistent with XLB's aspirations of developing the site, which are aimed at optimising new employment floorspace and maximising the benefits arising.

23. It is therefore proposed that the opening paragraph of policy KP6 reverts to its previous, more flexible, iteration with the floorspace cap removed. This would be consistent with Policy C1 (and its supporting text) and the NPPF. For completeness we set out our preferred drafting below:

    "The comprehensive or phased redevelopment of Langstone Technology Park to provide new or converted employment floorspace with supporting uses and infrastructure will be permitted where:…"

24. The proposed amendments seek to ensure sufficient flexibility in the policy wording to enable the positive, comprehensive redevelopment of this key employment area (either as one proposal or as part of a number of development phases), as supported by Policy C1 of the Draft Local Plan and the NPPF.

25. Within this context we also request that the proposed changes to paragraph 3.114 (the last sentence) is deleted and that the wording of paragraph 2.26 be reviewed and amended accordingly.

<u>Policy E12 – Efficient Use of Resources and Low Carbon Design</u>

26. Whilst XLB support the general thrust of Policy E12 and acknowledge the importance of delivering sustainable developments, this does need to be balanced against scheme viability to ensure that the requirements are not unduly onerous and would stop otherwise acceptable development coming forward.

27. This is recognised at paragraph 5.123 of Proposed Change E12-01 but we believe this important caveat should be included within the detailed policy wording to provide clarity and certainty to developers when bringing development schemes forward.

Conclusion

28. We trust that these representations will be taken into account and would welcome the opportunity to discuss them with the Council in more detail.

BARTON WILLMORE LLP