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Dear Jenna

LPA Ref: 21/00087/FUL – Former Newsquest Building, Test Lane, Southampton

We write to you in relation to the aforementioned planning application and following the submission of most of the formal consultee responses to date, the vast majority of which have been no objection, subject to conditions. These responses have been received on the planning application since it was registered and validated on the 29th January 2021.

This is in addition to pre-application consultation that the applicant undertook between December 2020 and January 2021, which included bespoke public engagement with the Redbridge Residents Association (RRA) and the wider community.

From our review of current comments, we can see that there remain eight objections from the public consultation and one letter for support. This is in the context of 155 consultations being circulated with wide further exposure via the RRA Facebook page and a number of face to face sessions via Zoom. LSH and the applicant's design and technical team have been in constructive consultation with relevant agencies since submission in January 2021.

We understand that the broad scope of the extant objections relates to four main points, namely:

1. The loss of mature trees on the boundaries;
2. The inclusion of a second access into the subject site;
3. The details of the no-left turn on to Test Lane; and
4. There is no demand for further employment uses.

Further to a positive and continued dialogue with the ward councillors and the Redbridge Residents Association (RRA) on the 15th March 2021, we understand that there is continued concern with the proposal but following the discussion it was clear that is mainly on the basis of the second access that the applicant is seeking to provide off Test Lane. We can confirm that this will provide dedicated service access to units 2 and 3 of the proposed development. This is in addition to the retention of the existing access into the site that will serve unit 1.

The proposed accesses also need to be considered in the context that the proposed development will result in less traffic movements, as shown in the transport evidence submitted, the level of movement reduces by 85% and the level of designated car parking reduces by 35% to the current land use.

In the meeting on the 15th March, the design team and client confirmed the position of items 1, 3 and 4, and we felt that the RRA and ward councillors were more content with the position of the proposed no left-turn arrangements. LSH can confirm that these have been agreed with the LHA and Highways England as acceptable. We can also confirm that there is no change to the existing TRO (SN280) that sits along Test Lane to the south of the application site and these restrictions will remain in place to protect Redbridge from any HGV traffic. The applicant has also made further minor amendments to the two junctions that would further deter private vehicles from exiting left on to Test Lane. This is in the context of significant reduction in private car usage from the current legal land use and that there is currently no such restriction on the Newsquest site. This has to be considered extremely favourable.

We also confirmed the significant bio-diversity improvements that the proposed development would be facilitating, despite the removal of some trees to facilitate the development and the second access location. The point on item 4 is unsubstantiated and the submitted planning statement has dealt with this in detail.

In fact, the opposite is the case and particularly in Southampton there is a paucity of good quality employment space either existing or proposed. It is worth focussing on this point momentarily as we have all come to appreciate the key role of these economic uses to our economy and personal lives throughout the pandemic and structural changes that Brexit will create. High quality new employment uses are the key to economic prosperity and central to the 'levelling up' approach supported by the Government and reflected in the success of Southampton gaining Freeport status. The best companies gravitate towards the best space and it is vital that the Southampton and the Solent region can offer what is needed in this regard to attract jobs and inward investment. Occupiers are increasingly demanding well designed accommodation that meets their own ESG agenda and green initiatives. This includes Royal London who are committed to climate change and sustainability, as set out in the planning statement their funding and development criteria is geared towards achieving these objectives.

LSH submitted a response to the RRA on the 17th March set out the current position of the site, to date, we have not received any further response from the RRA.

From our understanding of the issues raised, we believe that the main remaining concern is the second access to the subject site. The applicant has continued to re-iterate the importance of the business and operational requirements for this second access arrangement. Industrial and distribution uses depend on clear highways arrangements both internally and externally and the success of these schemes often hinges on what the transport manager thinks or the highways and service yard arrangements.

As provided in the Planning Statement, the limitation to one access would render the proposed facility unviable from an operational and functional position. Most national logistic operators require self-contained premises with separate, secure and managed access road and yard areas. This is to make efficient use of the service areas and to ensure on-site congestion is minimalised.

We consider that having two vehicle accesses will help further '*traffic calm*' Test Lane and make the highway safer, but will still provide priority to pedestrian and cyclists. As considered by local agents, retaining just one access point (see Appendix 6 and 6 of the Planning Statement) will cause congestion on both the internal service road and Test Lane which will have a negative impact on both occupiers and residents in Redbridge. The limitations of one access point have been highlighted in another scheme in Southampton (Eling Wharf) which has led to tail-backs and congestion on the

main highway. Therefore, the second access will reduce the propensity for congestion in and out of the site as it will dilute HGV movement on the site. Our highways team are confident that the proposal works on a technical basis.

Without duplication of the evidence set out in the submitted planning statement, it is confirmed that the buildings have been designed to offer a functional and high quality business product which will satisfy the future occupier's requirements whilst simultaneously contributing towards the areas strong identity as a location for economic development. The proposals will build on the already excellent reputation of this strategic corridor for high quality employment premises. The proposals have been designed with input from experienced letting agents in terms of size of units and specification to ensure they meet the needs of the Southampton and wider regional market.

The layout of the proposals has been influenced and constrained by the retention of the existing tree coverage of the site. This priority for tree retention has meant that the developable area is restricted but is equally efficient in maximising the redevelopment of a previously developed site into active economic use. It is important to consider that the proposal will create new employment opportunities for the city of Southampton and the wider Solent area. It is critical to create an efficient, flexible and productive space to facilitate a functional and commercially viable scheme that future operators will want to invest and take space in.

The need to provide sufficient space for HGV movement both in and out of the site but also within the site is critical to future tenants operations, as this will ensure that vehicle movements are controlled within the proposed service roads and allow efficient logistics within the curtilage of the proposal. It will also minimise the likelihood of congestion within both the site itself and outside the site on to the public highway network during peak periods.

The proposal provides sufficient size and dedicated service yards for each of the three proposed units, which will allow them each to have sufficient and minimum space to manage vehicle and good movements in the off and peak periods. This removes the risk attached to sharing space which would be simply not acceptable to operator due to obvious security of goods and conflict with users.

The applicant has been open-minded to the option of a single access point and has challenged the professional design and agency team to reconsider this. In addition, the LHA team has kindly put some thoughts as to optionality for consideration.

From review of Option 1 provided by the LHA (see below) the introduction of a 5.5 metre internal road for private motor vehicles will reduce the size of the service yard from 40 metres to 32.5 metres (when you take into account construction detailing and landscape impact), which would result in a 20% reduction in the service area and remove the minimum 40 metre service yard requirement for high quality operators. Our agents have confirmed that this would significantly impact on the future lettability of unit 1 and as shown would immediate prejudice the ability of HGV to manoeuvre in the assigned service area. Option 1 also includes the closing off the existing access into the site, and this would provide little benefit to the overall scheme especially in terms of bio-diversity improvement as the access in existence currently and is considered safe. The option would also have an adverse effect on Unit 2 as it would reduce the service yard smaller and inferior to that proposed.

The closing off of the existing access would also create an inferior environment for Unit 1 where staff and visitors would need to navigate past the proposed service yard and this arrangement would provide an unacceptable cul-de-sac environment which would raise possible security concerns to

future tenants as it would reduce the natural surveillance benefits that the current proposals provide. It would also increase the level of possible vehicle conflict within the overall site between staff and HGV movement, which would inadvertently increase risk to potential incidents on site.

The agents are also clear that the proposed options by the LHA would compromise the profile, image and perception of prospective occupiers of Units 1 and 2 and the access arrangements would simply create a constrained design response that would not generate the qualitative advantages of creating a Class A grade B2 and B8 accommodation in a primary employment location.

Further, Option 2 that has been provided by the LHA still creates two access points into the site, and given the changes to the internal arrangements of the operation, would not be acceptable to the applicant and future operators due to the reasons set out already. Given the concerns from residents it would also not be acceptable to them. Therefore, it cannot be considered an acceptable solution or have any benefit to all interested parties and should therefore be discounted.

The applicant would like to stress that we are collectively appreciative of the efforts made by the Council's highways team to challenge the design – however, the main impact that adversely affects the viability of the scheme is the reduction in size of service yards which means the scheme goes from what is considered best in class facilities to B grade and the effect that will have on the type of occupier that can use and operate the scheme.

We believe that the proposals provided by the LHA clearly demonstrate that the optimum solution and location for the access into the site is actually the new proposed access. Therefore, the submitted proposal demonstrates that the design by the applicant is appropriate and best suited to deliver a safe and acceptable development and further reinforces the robustness of the submitting planning application whilst delivering the economic benefits that the proposal will deliver to the Solent region.

Both access points are technically compliant and there is no precedent in highways terms for consolidation when there is a compliant and safe scheme. The scheme will generate the same amount of traffic whether there is a single point of access or two access points. In particular, the new proposed second access will have the effect of slowing cycle speeds on the downhill stretch before the South Central entrance which must bring benefits, as well as limiting speed on what is a shared surface with pedestrians. However, the changes to the scheme will ensure that cyclists and pedestrians retain priority and HGV and private vehicles will need to give way to these users therefore the integrity of this corridor is retained.

We contend that amending the proposed access into the site and reducing the scale of the service yards will only serve to prejudice the attractiveness of the units to the market. Given Southampton's successful Freeport status as announced in the HM Government's budget in mid-March, it will be imperative that high quality stock is created that serves the tenants well and provides long term industrial stock that can ensure the effective running of the Freeport.

Notwithstanding the consideration of a number of options provided by the LHA, we can confirm that there has been no objection from Highways England or the Local Highway Authority to the proposed second access and this is purely driven by reservations by the residents. The LHA have confirmed that there are no severe impacts on road safety or on highway capacity as a result of the proposed development that is submitted. As such the proposed development meets the requirements of the NPPF and importantly the market sector that this is designed to respond to.

In conclusion, we believe that following our reflection on the alternatives presented that the scheme as submitted remains the best overall balance for the scheme and the surrounding area. We have concerns that if the suggestions were pursued it would only serve to create an inferior product to that submitted by the applicant and would prejudice the economic (and environment) benefits of the proposals. The applicant is committed to delivering a high quality Class A development that will secure high quality tenants and create prosperity to the wider community as part of a wider recovery package in response to the COVID19 pandemic and the UK's wider global ambitions.

We believe that the qualitative improvements that the Class A accommodation will create match the global ambitions of the city of Southampton and its new found Freeport status. This has to be considered in light of the limited amount of development sites within the existing and well established economic hubs such as Nursling and Yeoman industrial areas.

Our client has advised that this is the best located scheme Salmon has worked on in recent years but at the same time the application site has presented more technical challenges to deal with than any other. Salmon have been committed to the Newsquest site for well in excess of 12 months and has had to balance the physical constraints of the site – shape, levels, ecology and proximity to the Test SSSI whilst bringing this vacant land back into a purposeful economic use. This has been a huge challenge but equally very rewarding as we believe that the collective efforts by SCC and the design team to date have created an exemplar employment product that on balance meets economic and environment requirements. Salmon and Royal London see the site as a showcase for how to deal with all of these challenges and present a scheme that serves the City and those who choose to do business in it as well as the residents and their environment.

On balance we feel that the scheme we have submitted, collectively challenged, together with a number of amendments in terms of highways design, tree retention and bio-diversity enhancement and protection is the best balance of all of these elements.

The economic benefits facilitated by the proposal have to be balanced against the environment improvements that we have also been able to put forward in response to the mitigation and these measures have remained a cornerstone of the proposed design approach.

We trust that the Council can place significant weight on the economic and job creation opportunities that this development will bring to Southampton and more importantly the Redbridge Community.

Yours sincerely,



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