

BROADWAY FARM – Comments to planning appeal
APP/W1715/W/23/3326789

**CONVERSION OF AGRICULTURAL LAND IN SETTLEMENT GAP TO LARGE INDUSTRIAL
DISTRIBUTION CENTRE FOR INTERNATIONAL BUSINESS**

This application has to be seen in the context of a series of applications which have rapidly changed the nature of the site from agricultural to a distribution hub for a major international company.

There are concerns that:

- The development is in a designated strategic gap which has been identified in the borough and local plans as an area which has to be free of development
- Statements made in applications are not consistent with what has actually happened
- The existing development already appears to exceed what has been approved
- The application seeks to extend the development beyond what has already been built
- Given the rapid development on the site, with the regular submission of applications for more development, there is a concern that there will be further development on the site
- Whilst the access road to the site is currently an A road, there is a Bypass under construction which will lead to the road being downgraded to a road for local traffic only. As such, the HGV vehicles using this site will then be the only heavy vehicles on the road, so will undermine the improvements in traffic flows and air quality which the Bypass is intended to provide

It is clear from the information below that there has been a change from a small pallet redistribution business operating in a limited area, to a large-scale distribution business for major international companies. It seems that the business has outgrown the site, and should relocate to a more suitable place, and not be allowed to expand in a designated strategic gap.

There are additional concerns that:

- There is a history of building more than / different from what has been approved
- There will be further applications to expand the site more
- There will be an application to convert the “brown field” site to housing (the operators have previously sold their car boot sale site in Bursledon / Hamble for housing – now Kestrel Park)
- The continual submission of planning applications which are then withdrawn extends the time that they are using the site and will allow a claim under LDC as was done under LDC/17/80680 and LDC/23/95111

The site should revert to what was approved under F/17/81201 and nothing else.

CHRONOLOGY OF DEVELOPMENT

Agricultural land

1997 - Z/17963/001/00 – Use of rear yard for pallet repair and storage with retention of relocated portable office and shed. Refused 1997.

2007 - F/07/59932 – Construction of garage & accommodation – Refused

2008 – F/07/61818 – Construction of garage & accommodation – Refused

2008 – F/08/64049 – Construction of garage & accommodation – Permitted, but with agricultural tie on property.

It is not clear if there is still an agricultural tie on the property, or when the pallet operation was agreed after it was refused in 1997.

Start of development of site from small pallet business to major distribution hub

2017 - LDC/17/80680 – Replacement of existing old buildings with new warehouse - (Permitted 2018).

Request for single 200 m2 building under permitted development rules (silver building with CCW Services pin) – approved



12th August 2016

Actual construction (silver building with CCW Services pin) – Building of 396 m2



15th September 2019

2017 – F/17/81201 – Application to replace other existing buildings, and to approve the buildings already built in excess of what was approved under LDC/17/80680 - Approved

Application request:



What was actually built:



6th May 2020

It is clear that Building B is much larger (6 times??) than in the application, and the gravel car park has been extended and converted to non porous tarmac.

Site as it is now, without any further approved planning permission after F/17/81201:



21st March 2021

It is clear that what has already been built is in excess of what has been approved. What appears to be in breach of what has been approved under planning applications is at least:

- An extra building (Building 3 in the plans)
- A much larger building that has been approved (Building 1 in the plans)
- A building that was twice the size of the one approved under LDC/17/80680 (Building 2 in the plans)
- A large area of tarmac added ("NHS parking area" in the plans)
- Car tarmac parking area enlarged
- Areas that had been porous gravel have been converted to non-porous tarmac, and new areas of non-porous tarmac added, with no measures to contain the water run off (the adjacent main road is already subject to flooding in the winter, and the streams that border the property and the houses opposite are already at capacity)
- The site had approval to operate from 6am-7pm Summer, and 7am-5pm Winter. It is now 24hrs a day, 7 days a week.

STATUS OF BROADWAY FARM BUILDINGS 2022

LDC/17/80680

Buildings Covered by F/17/81201 - Retrospective Application **GRANTED**

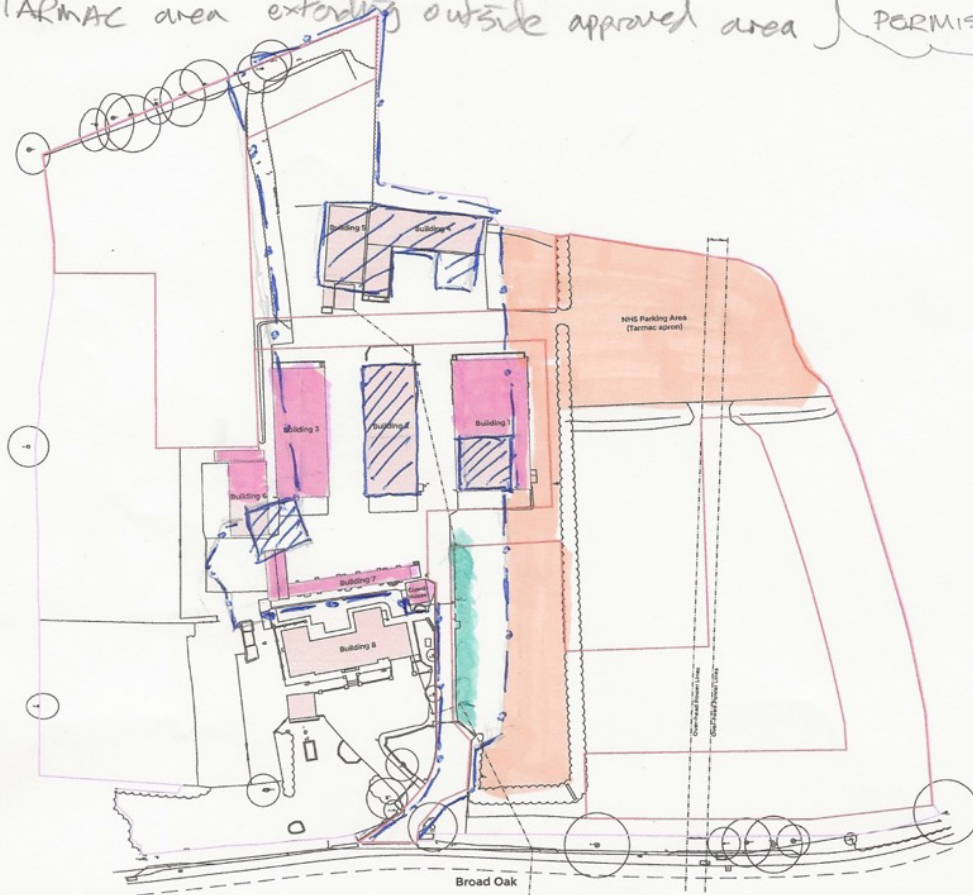
--- Boundary of F/17/81201

EXISTING

Buildings with NO APPARENT PLANNING PERMISSION

TARMAC area extending outside approved area

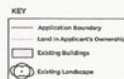
NO
PLANNING
PERMISSION



Existing Site Plan



Line of trees removed and now tarmac



PLANNING

A	20/01/21	Revised Planning Submission	10	11
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Client	CCW Services Ltd
Project	Building 8, Broadway Farm, Broad Oak
Title	Existing Site Plan

CCW-BSL-ZZ-XX-DR-A-2000-PL-A

B+S Ref.	Date	Scale @ A1	Drawn	Checked
20001	Sep 2021	1:500	PN	SD

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Other than for the purposes of planning, do not scale these drawings. Use written dimensions only. All dimensions to be checked on site prior to construction of work.

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A simple comparison of this plan with the aerial photo from 2016 above shows how the site has rapidly expanded from a small pallet operation with six 7.5 tonne vehicles to a large distribution centre for an international company with forty-seven 44 tonne heavy vehicles.

There are inconsistencies in the information used for different planning applications, including:

2017 – F/17/81201

This application was essentially putting forward the case that the application was replacing old buildings in need of replacement, and tidying up the site.

This application included the statement in Para 7.14 (page 9) which states:

As set out below, the number of vehicle movements within the site and to and from the site is likely to decrease from the existing situation and thus should reduce the overall impact on residential amenity. The proposed hours of work on the site will remain unchanged from the existing - 6am - 7pm (summer months); 7am - 5pm (winter months).

2023 - LDC/23/9511

This application was a claim that the large tarmac apron that was added in 2020 was an area which had previously been “Grasscrete”, and the application was putting the case that the apron had been used for more than 10 years.

This application includes a table in the document “230424 F Louisa Doe Statement of Declaration - V1.pdf” which shows the number of vehicles which are licenced to operate from the site over time.

16. The Table 1 below illustrates the changes to the Operator's Licence from 1995 to the present day.

Table 1.

Year Date	Total Number	7.5tonne	18tonne	44tonne	Trailers	Licence name	Licence type
May-95	6	4			2	MD	Restricted
May-05	6	4			2	MD	Restricted
Mar-05	6	4			2	MD	Standard National
June-10	6	4			2	CCW	Standard National
Aug-16	11	2		5	4	CCW	Standard International
Jun-17	15	1		8	6	CCW	Standard International
Dec-18	26		2	12	12	CCW	Standard International
Jun -19	32			17	15	CCW	Standard International
Nov-19	46			19	27	CCW	Standard International
Feb-20	47			20	27	CCW	Standard International

This table clearly shows that the site operation has changed dramatically from a small number (6) of 7.5 tonnes vehicles, to a large number (47) of 44 tonne vehicles.

In application F/21/91859 it was stated that this new area of tarmac area was solely for the storage of NHS ambulances at a concessionary rate.

- There is no mention of that in later applications, and the latest of which LDC/23/9511 states to the contrary that this area was put in place to ease the storage and parking of large trailers.
- Inspection of the aerial photos of the site show only limited use by NHS vehicles, and storage of other material including pallets, trailers, etc. (eg - see photo above taken on 21st March 2021)

Later applications state that the site is used 24/7, contrary to what was stated in application F/17/81201 about restricted hours of operation namely, *6am - 7pm (summer months); 7am - 5pm (winter months)*.