

PLANNING APPLICATION RESPONSE OF PLANNING POLICY

Application No:	APP/19/01166
Site Address:	Former site of Colt International Ltd, New Lane, Havant, PO9 2LY
Development:	Reserved matters application following Outline Planning Permission APP/18/00244 relating to access, appearance, landscaping, layout and scale for residential development of 95 dwellings and discharge of conditions 15 (vehicular access points) and 16 (pedestrian and cycle links)
Case Officer:	David Eaves
Comments by:	Jade Ellis
Date of Comments:	20 th January 2020

Policy Status:

The [Local Plan \(Core Strategy\)](#) and the [Local Plan \(Allocations\)](#), together with the [Hampshire Minerals and Waste Plan](#), provide the development plan for the borough. The [Pre-submission Havant Borough Local Plan 2036](#) (HBLP 2036) was approved by the Council on 30 January 2019 and can be afforded limited weight.

The following policies are of particular relevance:

- CS2 – Employment
- DM3 – Protection of Existing Employment and Tourism Sites
- CS6 – Regeneration of the Borough
- CS9 – Housing
- CS16 – High Quality Design
- CS19 – Effective Provision of Infrastructure
- CS21 – Developer Requirements
- DM10 – Pollution
- DM13 – Car and Cycle Parking on Residential Development

In the Pre-submission Plan the following policies are of particular relevance:

- C1 | Protection of existing employment sites
- H1 | High quality new homes
- H3 | Housing density
- E1 | High quality design
- IN1 | Effective provision of infrastructure
- IN3 | Transport and parking in new development
- E22 | Amenity and pollution
- H35 – Colt Site

Principle of Development:

Policies CS2 and DM3 of the Core Strategy generally safeguard the land or premises which were currently or last used for B use class employment purposes from other uses. However, the site is also allocated for development of about 90 dwellings and about 2,900 sqm of employment floorspace (classes B1, B2 and B8) under Policy H35 in the emerging Local Plan which can be afforded limited weight at this stage.

Outline planning permission ref. APP/18/00244 is reflected in criterion d. of the policy which states *“there is no overall net loss in the number of jobs when compared to the last*

occupation of the site for employment purposes.” There is also an emerging requirement which refers to the need for the appropriate size, format and layout of the employment units to be provided to be attractive to prospective occupiers in the locality and the wider Havant area.

In addition, the S106 agreement attached to the planning permission requires that the 2,860 sqm of employment floorspace is marketed alongside the residential element of the scheme. Given that there is not detail regarding the employment development, it is questioned whether this has taken place.

The corner of Bartons Road and New Lane forms part of the gateway to the New Lane industrial area, and employment use(s) should be retained in this location accordingly. Criterion e. i. of the site allocation policy clearly states that planning permission will only be granted where the design and layout *“retains appropriate employment use(s) on north-west corner of New Lane and Bartons Lane to act as a gateway to the wider New Lane established employment area.”*

The submitted Block Plan indicates a retained “Employment Zone” to the New Lane frontage which is supported in principle. However, there is very limited other evidence to show that employment would be re-provided on this part of the site.

Development Requirements

It was previously advised the development proposals should be designed to meet the requirements in the Pre-Submission Havant Borough Local Plan which can be afforded limited weight.

The full set of developer considerations can be found in the emerging allocation policy; please see Policy H35 in the Pre-Submission Draft Local Plan. Criteria d. relating to the design and layout of the site will be of particular relevance to the residential element of the development proposals.

Analysis of the scheme’s compliance with various emerging policies is set out in the table below:

Policy	Requirement	Comment
Internal Space Standards (Policy H1)	A requirement for dwellings to meet the nationally described internal space standards	It is unclear whether the scheme is policy compliant on the basis of information provided.
Enhanced Accessibility Standards (Policy H1)	30% of proposed dwellings to meet enhanced accessibility standards (M4(2)) and 2 of the total proposed dwellings to meet wheelchair accessible standards (M4 (3))	The applicant is not proposing to provide dwellings that meet these standards.
Private Amenity Space (Policy H1)	Requires sufficient private and/or communal outdoor amenity space to be provided.	Again, it is unclear whether the scheme is policy compliant on the basis of information provided
Housing Mix (Policy H4)	Development proposals should provide a range of dwelling types and sizes to meet identified housing.	The submitted accommodation schedule indicates that 51 of the 95 dwellings (54%) would be provided as two-bedroom homes.

	This should incorporate approximately 35% as two-bedroom homes as part of the overall housing mix (both market and affordable).	In terms of the overall affordable housing mix, 85% would be provided as affordable housing, whilst two-bedrooms would account for 35% of the market housing provision.
Low Carbon Design (Policy E12)	Residential development is expected to achieve a 19% reduction in Dwelling Emission Rate.	Again, it is unclear whether the scheme is policy compliant on the basis of information provided.
EV Charging Infrastructure (Policy IN3)	Electric Vehicle charging infrastructure should be provided for each new residential unit with private off-street parking.	It does not appear as though the applicant proposes to address this policy requirement.
Management Plans (Policy IN5)	A management plan is likely to be required through a legal agreement to establish the whole life management and maintenance of the common parts within the development.	It is noted the applicant has submitted a landscape maintenance and management specification. However, this only covers one type of common part in the development.

In order to more effectively assess the scheme's compliance with emerging policy, it is recommended that the applicant should submit a Compliance Check.

Affordable Housing:

Policy CS9 sets out an affordable housing requirement of 30-40% on sites or 15 dwellings (gross) or more. This is reinforced by emerging Policy H2 which sets out a requirement for 30% affordable housing on sites resulting in a net gain of 10 or more dwellings. Of the 95 dwellings proposed, 34 of the units are proposed to be affordable equivalent to 35% across the site.

Criterion b. of the emerging policy sets out that 10% of the total of new homes (gross) should be shared ownership (as part of the affordable housing), with the balance being rented. This is because the Council's preferred route to affordable home ownership is shared ownership in the context of Annex 2 of the 2019 NPPF. It is noted that 10 of the 34 affordable units will be provided as shared ownership, equivalent to 10.5% of the total new homes. The Council's Housing Officer will be able to provide further advice in terms of the mix should be provided.

Parking:

The proposals would need to ensure that appropriate parking provision is provided in accordance with Policy DM13, emerging policy IN3 and the Council's Parking SPD.

The submitted Transport Assessment indicates that a total of 173 spaces would be provided split between allocated, unallocated and visitor parking spaces. Of these, 19 would be for visitors. Based on the submitted housing mix, the allocated parking space requirement would generate a total requirement of 190 spaces:

Size of Dwelling	No. of Units	Minimum Car Parking Requirement	Number of Spaces Required
<i>Allocated spaces</i>			
1 Bed Unit	2	1 space	2
2 Bed Unit	51	2 spaces	102
3 Bed Unit	37	2 spaces	74
4 Bed Unit	4	3 spaces	12
TOTAL			190

With an additional 20% of unallocated parking for visitors (38 spaces), there would be an overall requirement of 228 spaces. Overall, there would therefore be a deficit of 55 car parking spaces. Paragraph 3.07 of the Parking SPD indicates that outside of the town centres, this will be assessed on a case by case basis. A justification would need to be provided which considers accessibility to shops and services, accessibility to public transport and the site's relation to the relative accessibility of different areas (as set out in table 3.1 of the SPD).

It is noted the applicant proposes to provide cycle parking spaces in accordance with the requirements of the Parking SPD.

Summary:

Notwithstanding the very limited evidence that has been provided in respect of the commercial element of the scheme, the development proposals are broadly supported in policy terms. In addition, the applicant should be aware that there is clear requirement in the S106 attached to the outline consent for the commercial element to be marketed alongside the residential scheme.

There are various shortcomings against the emerging requirements in the Pre-Submission Plan. It is recommended that a Compliance Check is sought in order to better understand the extent to which the scheme complies with emerging policy which has limited weight at this stage. It is also noted the site is situated within the built-up area and is generally compliant with the Adopted Local Plan which is a consideration.

It is noted that the applicant proposes more than 30% affordable housing (at 35%) and this is welcomed. However, it is noted that insufficient level of car parking is proposed against the Council's adopted car parking requirements. As such, the applicant will need to provide justification which assesses the site's accessibility as set out above.