

Statement of Conformity with Pre-Submission Havant Borough Local Plan 2036 – Template Compliance Check

The template below is designed to help applicants check the compliance of their scheme with the emerging policies in the new Local Plan for Havant Borough. While the [adopted Local Plan \(Core Strategy \(2011\) and the Site Allocations \(2014\)\)](#) remains in force until the adoption of the new Local Plan, it is considered that following the publication of the [Pre-Submission draft Local Plan in January 2019](#), the policies in that plan are to be afforded some weight in decision making.

Applicants for development which does not comply fully with the adopted Local Plan, and in particular proposals for development on sites which are not allocated in the adopted local plan and lie outside of the defined urban area, are expected to submit a Statement of Conformity with the Pre-Submission Havant Borough Local Plan 2036. Such a statement may be produced in any format, but the table below has been devised to aid this process, and full completion of the table will satisfy the requirement.

The table lists all the topic policies in the Pre-Submission Local Plan, and includes spaces to add any relevant site specific policies (Key Projects and Development Allocations). Not all policies will be relevant to each application. The onus is on applicants to review the Pre-Submission Local Plan in full to identify those that are relevant, and provide information as to how and to what extent their scheme meets the requirements of the emerging Local Plan.

The table contains four columns:

Column 1: HBLP 2036 Policy:

This column lists all the topic policies contained in the plan. Key Projects and Development Allocations should be added where relevant. Please review each of the policies in the HBLP 2036 to determine whether they contain provisions relevant to the scheme.

Column 2: Compliance:

Please write, ‘none’ ‘partial’ or ‘full’ to indicate the level of compliance you believe has been achieved for each policy. If the policy is not relevant to the proposal, write ‘not relevant’.

Column 3: Development Approach Taken:

Please use this column to set out how and to what extent the proposed development complies with the policies in the Pre-Submission HBLP 2036. This should consider all parts of the policy. Where only partial compliance is achieved, the elements not complied with, or the standards not met, should be highlighted.

Column 4: Reasoned justification for any non-compliance:

Where the development does not comply with all or part of a policy, please give reasons why it does not. This may include a statement that the policy is not relevant to this particular proposal (eg E4 ‘Development on the Coast’ will not be relevant to a development on Waterlooville). However, that argument may not be used to avoid compliance where the policy is relevant.

Statement of Conformity with Pre-Submission Havant Borough Local Plan 2036 – Template Compliance Check			
Application Reference:	APP/18/01033		
Site Name / Address:	Land East of Castle Avenue		
HBLP 2036 Policy	Compliance	Development Approach Taken	Reasoned justification for any non-compliance
VISION AND DELIVERY STRATEGY			
DR1 Delivery of Sustainable Development	Full	Development in line with policy. Plan acknowledges potential delivery of 10,231 houses, which includes development at Castle Avenue.	N/A
DR2 Regeneration	Full	The Company operate the construction of their development sites on a subcontracting basis with only a limited amount of key staff employed directly by the Company. The Company is unable to specifically require subcontractors to take on work placements. However, Persimmon does actively work with its subcontractor trades to actively encourage work placements. In terms of Community Officer, the Company are happy to make the requisite contribution, to be secured under the S106 agreement.	
KEY PROJECTS			
<i>[Add lines to reference relevant policies as appropriate]</i>	Not relevant		
INFRASTRUCTURE			
IN1 Effective provision of infrastructure	Full	The scheme will be providing appropriate financial contributions in line with discussions held with LPA.	N/A
IN2 Improving transport infrastructure	Full	Southern part of site clear for strategic road improvements, off-site works to be confirmed with HCC but in principle accepted by developer	N/A
IN3 Transport and parking in new development	Partial	The plans have been updated to show external electrical sockets for all houses save for Plots 3-9 where the layout precludes their provision. Parking standards are accepted. The site has been laid so as not to prejudice access to land to the east and south and onto wider cycle/footpath networks.	It ought to be noted that the Company objected to the inclusion of electric charging points in representations to the last stage of the Local Plan, and will be doing so again in the current consultation. The requirement for electric charging points has not been justified, and there is no evidence on the impact these have on the viability of housing schemes. Without this, we do not feel the Policy is justified or sound. Charging points can add significantly to the cost of building homes, which in turn

		In terms of commercial vehicles, Persimmon place restrictions upon the deeds of properties, outside of the planning system, to prevent the parking of large vehicles, e.g. caravans, boats, campervan and commercial vehicles that exceed 5 metres in length and 2 metres in height (roughly the dimensions of a standard Transit van or equivalent). This restriction would only affect large vehicles that would be of a greater size than the parking spaces themselves, in order to ensure that the spaces that have been provided can be utilised fully and that the estate roads do not become blocked, to the detriment of local amenity and highway and pedestrian safety. It is not possible for Local Planning Authorities to restrict or control the types of vehicles that can be parked. By implementing measures to safeguard the parking provision outside of the planning system, therefore, controls are in place to ensure that the car parking is available and used for its intended purpose. These restrictions are made known to any prospective purchaser. Issues of highway obstruction are dealt with by the Highways Authority and/or the Police.	will increase the selling price, which will have an adverse impact on affordability.
IN4 Access onto Classified Roads	Full	Development allows for vehicles to turn and enter/exit site in a forward gear	N/A
IN5 Future management and Management Plans	Full	Management Company will be introduced once site is up and running. This will be a clause in the S106.	N/A
THE ENVIRONMENT			
E1 High quality design	Full	The scheme meets criteria in this Policy. The Company has worked with the LPA and amended the layout where requested to date.	N/A
E2 Health and wellbeing	Full	Publically accessible LAP to be provided on site. Site has single point of entrance, but is well located with easy access to majority of facilities.	N/A
E3 Landscape and settlement boundaries	Full	Site is allocated in Housing Delivery Statement, and emerging Plan, so not considered outside of settlement boundaries. Local character has been considered.	N/A
E4 Development on the Coast	Not relevant		

E5 Chichester Harbour AONB	Not relevant		
E6 Best and most versatile agricultural land	Not relevant	See E3	
E7 Hermitage Stream	Not relevant		
E8 Protection of existing open space	Not relevant		
E9 Provision of public open space in new development	None	Site provides 2,062sqm of POS against requirement of 2,460. However publically accessible LAP is being provided, which is not required under Policy. The Company is happy to integrate street fruit and/or nut trees within the landscaping scheme as means of providing community food growing space.	The scheme was developed prior to emerging Policy, and was developed in consultation with the LPA. Provision of publically accessible LAP, which is beyond policy requirements is considered to be of substantial benefit, given that it will be available to existing and proposed residents, and there are limited facilities of this nature in the surrounding area.
E10 New and extended Cemeteries	Not relevant		
E11 Sports and recreation	Not relevant		
E12 Low carbon design	Partial	Proposed houses are of timber frame construction, which is a more sustainable material and takes less time/energy to build. The houses will be designed to meet building regulation standards, but will not meet a CO2 emissions reduction beyond this.	The Company objected to the inclusion of increased sustainability standards in representations to the last stage of the Local Plan, and will be doing so again in the current consultation. The Company does not feel there is any reasonable justification for the LPA seeking to go beyond building regs in looking at building construction, as it is the purpose of building regs to cover these issues. Additional energy reduction measures will increase the cost of building homes, which will increase values and adversely impact on affordability.
E13 Historic environment and heritage asset	Full	Scheme of archaeological works has been agreed with HCC as part of the application.	N/A
E14 The Local Ecological Network	Full	Current biodiversity interest is limited, as it's a grazing paddock with limited vegetation. Scheme provides improved hedging and significant contributions under SRMS protocols. Full ecological assessment has been provided with the application, and Natural England have been consulted at numerous stages. The Company is happy to provide enhanced biodiversity enhancement measures on site, including bird and bat boxes.	N/A

E15 Protected species	Full	As above. No impact on protected species.	N/A
E16 Solent Special Protection Areas	Full	As E14, contribution to be made.	N/A
E17 Solent Wader and Brent Goose sites	Full	Contribution to be made to Natural England to offset impact of development. Evidence through ecological surveys has shown field is not used by birds, notwithstanding classification.	N/A
E18 Trees, hedgerows and woodland	Full	All protected and significant trees to be retained on site. Layout has accounted for relationship between proposed buildings and tree.	N/A
E19 Managing flood risk in new development	Not relevant		
E20 Drainage infrastructure in new development	Full	Drainage solution has been designed around Ground conditions and site constraints, and will accord with policy.	N/A
E21 Aquifer Source Protection Zones	Not relevant		
E22 Amenity and pollution	Full	Noise impact assessment provided and mitigation measures have been incorporated into layout.	N/A
E23 Air quality	Not relevant		
E24 Contamination	Full	Ground investigation completed which shows no contamination.	N/A
HOUSING			
H1 High quality new homes	Partial	All new properties are designed to provide sufficient outdoor amenity space. The majority of house types meet national space standards, albeit some of the smaller properties are marginally below. Proposed accessibility standards have not been met.	The scheme was developed prior to this policy being in place, so accessibility standards were considered to be suitably covered by building regulations. Moreover, the Company objected to the inclusion of space standards in representations to the draft Local Plan on the basis of viability, affordability and the failure to include a transition period and, as such, this policy requirement cannot be afforded any significant weight. Setting that aside, the scheme delivers a range of house types which will appeal to different markets and although 40 units do not meet the prescribed standards in terms of net floor areas, this calculation does not reflect the full position. The development consists of 12 different house types, of which 2 do not meet the prescribed standards. These two house types (Alnwick & Hanbury), which are intended to meet a specific

			market aimed at first time buyers, newly forming households as well as older households looking to downsize, are within 85% of the prescribed standards in terms of floor area and are often the first units to be sold on a development. The analysis carried by the Company concludes that the imposition of space standards would add £34,796.42 to the average price of an entry level 2 bedroom house price (from £259,882.72 to £294,679.14), exacerbating pre-existing affordability pressures in the Borough. Taking the above into account, notwithstanding the marginal deficit in terms of floor area, the proposed house types appropriately meet the housing needs of the Borough. In all instances, each proposed home has its own private garden and its own, allocated car parking at the adopted standards. It is considered, therefore, that all expected amenities for high quality family housing has been made available to the future occupants. The Open Market and Affordable Homes are identical in terms of size and layout.
H2 Affordable housing	Full	30% provided with small contribution provided for rounding of a unit, which has been accepted by affordable housing officer at the LPA.	N/A
H3 Housing density	Full	Net area of the site meets the density target of this Policy, at 40dph.	N/A
H4 Housing mix	None	Scheme provides 31% 2bed units (21 of 69). Albeit there are a number of smaller 3 bed units being provided.	The scheme mix was derived prior to this policy being drafted, and it only falls marginally short of the required percentage. The provision of smaller 3 bed units will also help affordability.
DEVELOPMENT ALLOCATIONS			
H15 Land East of Castle Avenue	Partial	The proposal only delivers part of this allocation due to land ownership.	The Company does not have a legal position to promote or develop the other parts of the allocation. The proposal will not prejudice the development of the remaining parts of the allocation and has been laid out in such a manner to allow for cycle/pedestrian access links to the wider networks in the area. The scheme provides a publicly accessible play area for use of all residents in the locality and serves to address an acknowledged deficit of such facilities.