

**Statement of compliance with the policies of the emerging
Havant Local Plan 2036.**

Campdown, land east of College Road.

October 2019.



This statement has been prepared by Persimmon Homes to support the planning application made to Havant Borough Council for the erection of up to 780 dwellings at land east of College Road, Campdown.

The proposed development is as follows:

A hybrid planning application comprising; full planning application for the erection of 130 dwellings with the creation of new access onto College Road, landscape, drainage, car parking and associated works; and outline planning application for up to 650 dwellings, community and nursery facility (use class D1 and D2), retail unit (use class A1), public open space, landscaping, diversion of public right of way and associated works and infrastructure.

This Statement has been produced in response to the emerging Havant Borough Local Plan 2036 which has been approved by the Council following a period of public consultation. Persimmon acknowledges the fact the proposal is a departure from the current development plan but is proposed to be allocated as part of the emerging plan. To this end Persimmon has considered the extent to which this proposal is in compliance with the Policies within the emerging plan.

It should be noted that comments received during the public consultation period have not yet been published, nor has the Council responded to comments raised by Persimmon Homes. To this end, Persimmon still feels that some Policies within the emerging plan have been appropriately justified or evidenced and then examined.

Policy	Compliance	Notes
DR1 – Delivery of Sustainable Development	Full	The proposal would significantly contribute to the emerging plan target of 10,231 dwellings during the period. The site is proposed to be allocated within the emerging plan. The site is well located to the urban area, would be of high quality design, well connected, well served by infrastructure and would not undermine the deliverability of other sites.
IN1 - Effective Provision of Infrastructure	Full	The proposal is supported by an Infrastructure Delivery Statement, demonstrating the infrastructure requirements of the proposal and how this would be funded and delivered.
IN2 – Improving Transport Infrastructure	Full	The proposal includes improvements to the local highway network and additional benefits in order to make the development acceptable in planning terms whilst also improving the local road network and infrastructure.
IN3 – Transport and Parking in new development	Full	The proposal is supported with a full Transport Assessment and Travel Plan to demonstrate compliance with this emerging Policy.

IN4 – Access onto Classified Roads	Full	The development would be served from a category C road. Vehicles may enter the development, turn and egress.
IN5 – Future management and management plan	Full	A detailed FRA and drainage strategy is submitted in support of this application. Maintenance of common parts will be either adopted by the relevant authority or through an established management company. This can be secured through a legal agreement.
E1 – High Quality Design	Full	The application is supported by a Design and Access Statement which demonstrates compliance with this policy.
E2 - Health and wellbeing	Full	The application is supported by a Design and Access Statement which demonstrates compliance with this policy.
E3 – Landscape and settlement boundaries	Full	The application is supported by a Design and Access Statement, landscape strategy and LVIA which demonstrate compliance with this policy.
E9 - Provision of public open space in new development	Full	The proposed quantum of open space substantially exceeds the open space requirement. Allotments are also provided.
E12 – Low Carbon Design	None compliance	Persimmon considers that the Building Regulations is the appropriate legislation for building design. Sufficient evidence has not been provided to justify exceeding the national, legal, standards.
E13 – Historic Environment and heritage assets	Full	The application is supported with a full heritage statement and associated documents.
E14 – The Local Ecological Network	Full	The application is supported by a full phase 1 habitat survey and with the required surveys undertaken. The submitted Environmental Statement provides a detailed commentary of ecological conditions on site and any mitigation or compensation measures required.

		The presence of wintering birds is acknowledged with a Strategy also submitted as part of the application.
E15 – Protected Species	Full	Appropriate mitigation is proposed for protected species on the site as detailed within the accompanying documentation.
E16 – Solent Special Protection Areas	Full	As detailed within the submitted Planning Statement, the applicant is happy to provide a suitable financial contribution under the SRMS. Where there are other potential impacts on the SPA these will be addressed through the course of the application.
E17 – Solent wader and Brent Goose feeding and roosting sites	Full	A suitable wintering bird mitigation strategy is proposed and submitted with the application.
E18 – Trees, hedgerows and woodland	Full	As part of the proposal trees and vegetation is proposed to be removed which are all 'Category C'. The application is supported by a full arboricultural report. A scheme for the protection of retained trees and hedge rows has been provided as part of the application.
E19 – Managing flood risk in new development	Full	A Flood Risk Assessment has been submitted in support of this application.
E20 – Drainage infrastructure in new development	Full	A full drainage strategy has been submitted in support of this application
E22 – Amenity and pollution	Full	The application is supported by a noise assessment and an air quality assessment. These elements will be assessed as part of the planning consideration.
E23 – Air Quality	Full	The application is supported by an air quality assessment
H1-High Quality Homes	Partial compliance	Discussed below in detail but NDSS can only be applied once they have been subject to EIP where, amongst other things, impact on viability is assessed.
H2 – Affordable Housing	Full	Persimmon is happy to agree the provision of 30% affordable housing for the site with 10% of the total

		affordable provision being shared ownership.
H3 – Housing Density	Full	The proposal meets the minimum density of 40dph.
H4 – Housing mix	Full	The scheme proposes a minimum of 35% two bed properties as part of the overall housing mix. The scheme proposed a range of dwelling types and sizes to reflect local need.
H40 - Campdown	Full	The proposal fully meets the requirements of this proposed policy given it is the proposed allocation for the site.

Policy H1 – High Quality New Homes

The housing standards review introduced the optional space standards which local authorities could adopt by way of reference in their local plans. The Council, in Policy H1|High quality new homes of the Pre-Submission Draft plan, sets out a requirement at bullet point **a** that, 'New homes are designed to meet appropriate internal space standards to provide sufficient private and/or communal space for basic daily activities and needs; ...'

2.25. A prerequisite to the adoption of the space standards are the following tests set out in the planning practice guidance (Paragraph: 020 Reference ID: 56-020-20150327).

"Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

- **need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
- **viability** – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
- **timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions."

Test 1: Establishing need

2.26. In order to meet the policy test for the inclusion of the space standards there is a requirement for the council to establish the need for the adoption of the national space standard. To this end the Council has submitted evidence in the form of the Specialist Housing Analysis (HBC, January 2019) at paragraphs 7.14 to 7.17. The council's evidence relies on the Housing Standards Review: Final Implementation Impact Assessment (March, 2015). This is clearly not an assessment of dwellings currently being built in the area nor does it consider the potential impact on meeting demand for starter homes. As such the policy fails the first policy test on need.

Test 2: Viability

2.27. The second policy test set out in the NPPG has 2 parts. The first part relates to requirement for a viability assessment to demonstrate that there are no adverse implications on development viability resulting from the introduction of the nationally described space

standards. The second part of the Viability test requires an assessment of the impact of the adoption of the space standard on affordability.

Potential impact on development Viability

2.28. In fulfilment of the first part of the Viability policy test the Council commissioned the Havant Borough Council Local Plan and CIL Viability Study (DSP, January 2019) which indicates that development viability would not be negatively impacted by the introduction of the standards. This has been done at a relatively high level, and the level of detail makes it difficult to conclude whether this part of the test has been fully complied with.

Potential Impact on affordability

2.29. The Council's viability assessment fundamentally fails the second part of the PPG test in relation to viability. No assessment has been done to demonstrate that the requirement for new development to meet the NDSS will not negatively impact affordability within the market. Furthermore, paragraph 4.37 of the PUSH SHMA 2014 states that, "... prescribing unit sizes ...could increase entry level prices leading to some buyers (particularly first time buyers) being priced out of the market."(Paragraph 4.37).

2.30. A review of the council's evidence as set out in the Havant Borough Profile, (HBC, January 2018) reveals that the average earnings for the borough are relatively low at £27500, which by the council's own assessment is only half of the income required to afford the average property (as at June 2017) of £266,540. This evidences significant pre-existing affordability pressures which the council rightly acknowledges.

2.31. Persimmon Homes undertook a review of the average prices for the properties in the area which are below the NDSS and assessed the potential impact on affordability. Table 4 sets out the findings of the analysis.

Table 4: Summary of affordability impact analysis
Average Price

Size	Non-NDSS	NDSS	NDSS Premium
2 bed	£259,882.72	£294,679.14	£34,796.42
3 bed	£287,861.71	£325,580.60	£37,718.89
4 bed	£344,850.25	£367,222.95	£22,372.70

2.32. As can be observed in Table 4, the introduction of NDSS will have a significant impact on the cost and affordability of entry level housing. For example, of the entry level 2 bedroom properties assessed, the average cost of the equivalent NDSS compliant dwellings would be have an average £294,679.14 an increase of £34,796.42.

2.33. Indeed; Appendix I – Viability Assessment Update – Residential Assumptions (1) of the council's own viability evidence assumes the following in terms the typical new build values for the borough based on the requirement for new dwellings to meet the NDSS;

- 2 Bed house - £276,500 to £316,000
- 3 Bed house - £350,000 to £400,000
- 4 Bed House - £455,000 to £520,000

This further underlines the negative impact arbitrarily requiring NDSS will have on house prices. In comparison non NDSS properties are more affordable as evidenced in Table 4.

2.35. Persimmon Homes work on a model that provides a substantial offer towards first time buyers looking at 2 and 3 bedroom family homes. Given that the council has set out a requirement for 35% of all dwellings to be provided as 2-bedroom homes, the Council has failed to understand that by including space standards they would be increasing the cost of entry those level 2-bedroom homes, putting them out of reach of first time buyers.

2.36. For reasons stated above, the proposals fail the Viability test.

Test 3: Timing

2.37. The Council has not set put a transition period for the adoption of the space standard and as such fails on this policy test. Conversely, the council are looking to apply the draft policies in this plan, including the requirement for NDSS prior to the examination or adoption of the plan. This contrary to the approach set out in the planning practice guidance. It is not practical to expect development proposals that are currently being considered to suddenly meet space standards.

Conclusion on justification for the requirement of space standards

2.38. The Council has failed to demonstrate a need for the adoption of space standards for market houses. As the Council should be aware, the space standards are to be adopted based on demonstrable need and are not a 'nice to have' policy requirement. It is the responsibility of the council to produce robust evidence to underpin any policy which the council has clearly failed to do in this instance.

2.39. Furthermore, the requirement for new development to meet NDSS fails the Viability policy test as the PUSH SHMA 2014 clearly indicates that the introduction of the standard would impact affordability for first time buyers. This is amplified by our analysis set out above and enclosed at Appendix 2. Council's viability assessment fails to provide an assessment of the impact on affordability.

2.40. In view of the above, the Policy H1a would fail the test for soundness as it is not justified.

Notwithstanding the above, the proposed houstypes for phase 1 detailed element have been assessed against the NDSS:

Housetype	Number of bedrooms	NDSS compliant total floor area
Morden	2 bed 4 person	No
Alnwick	2 bed 4 person	No
Barton Corner	2 bed 4 person	Yes
Barton	2 bed 4 person	Yes
Mosley	2 bed 4 person	No
Grasmere	3 bed 5 person	Yes
Derwent	3 bed 5 person	Yes
Windermere	3 bed 4 person	Yes
Lockwood Corner	3 bed 5 person	Yes
Cragside	3 bed 5 person	Yes
Cragside R	3 bed 5 person	Yes
Craghead	3 bed 6 person	No
Coniston	4 bed 6 person	Yes
Eldridge	3 bed 5 person	Yes
Ashworth	3 bed 5 person	No
2B3PF	2 bed 3 person	No
Longthorpe	4 bed 6 person	Yes
Earlswood	4 bed 6 person	Yes
Coniston Corner	4 bed 6 person	Yes

The above table shows that of the nineteen houstypes proposed within phase 1, thirteen of these meet the nationally described space standards in terms of floor area. The proposed dwellings at Phase 1 provide a varied size off dwellings to purchase which meet the needs of differing price points. The strict imposition of nationally described space standards would adversely impact on the affordability of properties, given build values are based on a rate per square meter. This would be significantly acute at the lower end of the market and could be a significant barrier to entry to the purchase of a market dwelling.

Conclusion

The application site has been allocated for residential development under emerging policy H40 and was allocated under the (now revoked) Housing Position Statement, significantly contributing to the Borough's five year land supply. The submission is in full compliance with substantial number of the emerging policies with only E12 and H1 not being fully complied with.