

Planning Policy Comments

Application No	APP/19/00007
Address	Camp Field, North of Bartons Road, Havant
Development	Outline Application for access with all other matters reserved, for up to 72 new homes plus associated green infrastructure including community orchard
Case Officer	David Eaves
Comments By	Jacqueline Boulter
Date of Comments	1 April 2019

Policy Status

The [Local Plan \(Core Strategy\)](#) and the [Local Plan \(Allocations\)](#), together with the Hampshire Minerals and Waste Plan form 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 must be afforded some weight.

As highlighted in earlier comments, the new plan does include a number of new provisions, such as minimum densities, internal space standards, requirements for housing mix, open space and food growing provision, and expectations for electric vehicle charging points, as well as the future management of the site. I understand that applicants will be providing a statement of conformity with the emerging Local Plan, which will assist in assessing compliance with the new provisions and how much weight should be afforded to them. This is likely to become pertinent at the reserved matters application stage.

Principle of Development

In the adopted local plan, the site lies outside of the urban area as defined by policies CS17 and AL2 of the adopted plan. These policies seek to restrict development in these locations, except in exceptional circumstances. I do not consider that any of the exceptions in the policy apply here, the proposal being a major scheme on greenfield land.

By contrast, the Pre-submission Local Plan includes a site allocation for this land (Camp Field, Bartons Road - Policy H18).

Overall, while the adopted Local Plan resists the principle of development in this location, the emerging plan clearly supports the principle, and this must be given weight in the determination of this application.

Coordination of Development

Pertinent to this site is policy DM6 of the Core Strategy, which states that proposals will only be permitted where they do not undermine the future development potential of adjacent sites. Proposals should not prevent future access to potential development sites or prejudice future schemes.

The new allocation policy in the HBLP 2036 also requires development not to prejudice the potential future development of the land to the North, in East Hampshire. Since both parcels are controlled by the same site promoter, and indeed the application documentation makes clear that the land to the north is being considered for development in parallel, I consider that this is likely to be met.

That being said, careful consideration must be given to whether the infrastructure to be provided as part of this application is sufficient to serve the wider site, or at least does not prejudice future delivery to serve the wider development (see criterion b of Policy H18,

which requires consideration of the wider site in infrastructure planning). I note that sensitivity testing has been included in the Transport Assessment accompanying the application to meet this requirement. Reference is also made in the Design & Access statement to the fact that the Open Space and SuDs is designed for the current application but has anticipated 50-70 houses for the land in East Hampshire and leaves sufficient open space including SuDS for that eventuality. We must satisfy ourselves that it will remain possible to deliver the site to the north, including meeting the full infrastructure requirements arising from delivery of the whole site, whether development on land to the north is delivered at the same time or at a later date.

At the same time, we must also satisfy ourselves that undue reliance is not placed on the East Hampshire Land to meet any policy requirements arising from development of land in Havant alone (in case the East Hampshire land does not come forward). For example, the current plan proposes a community orchard on the East Hampshire land. It appears that this land is being relied upon to meet the policy requirement under policy E9 of the Pre-submission Local Plan for food growing. A mechanism must be found to ensure that this is deliverable.

Development Requirements

The emerging site allocation policy H18, together with the DM policies in the adopted and the emerging Local Plan, sets out development requirements which should be considered during the determination of this and the subsequent reserved matters application.

A particular requirement with regard to this site worth highlighting at this stage is the need to minimise visual and noise disturbance from the dwellings and open space to ensure that the adjacent crematorium remains a tranquil place where mourners can expect a respectful experience. I note that an Acoustic Position Statement has been submitted. However, I note that this is focused on noise impacts on the proposed development, rather than those emanating from it. I would suggest that the noise impacts on the Crematorium need to be considered specifically to meet criterion h.i. of the emerging policy for the site.

Minerals Safeguarding

[Policy 15 of the Hampshire Minerals and Waste Plan](#) seeks to prevent the needless sterilisation of Mineral Resource by other development. The policy and the associated SPD therefore define a Minerals Safeguarding Area (MSA) where prior extraction of minerals should be considered before development takes place. The Minerals and Waste Consultation Area (MWCA), i.e. the area where LPAs are required to consult HCC, is set to cover the Minerals Safeguarding Area.

The purpose of the MCA is for LPAs to consult the mineral planning authority and take account of the local minerals plan before determining a planning application on any proposal for non-minerals development within the MWCA. This site lies within the MSA/MWCA.

The Hampshire [Minerals and Waste Safeguarding SPD](#) clarifies that efforts for minerals extraction and consultation with HCC is only expected on developments that are greater than 3 hectares. At 2.5ha, the site area of the application site is below this threshold. However, the SPD is also clear that consideration should be made if a proposal sits alongside other piecemeal development (i.e. other small proposal clusters within the MWCA) or there are known future plans for development (i.e. site is located within a wider development area) - see Paras 4.13-4.18 and Appendix 2 of the SPD. This is clearly the case for the application site when the land in East Hampshire, another 2.6ha, is taken into account.

On the basis of the Minerals & Waste Plan and associated SPD, I consider that prior extraction of minerals needs to be considered, and HCC as Minerals and Waste Planning Authority should specifically be made aware of the wider site and their input sought (see box on p.36 of the SPD).

Conclusion

The principle of the development is not supported by the adopted Local Plan, but is accepted in the emerging HBLP 2036, through a draft site allocation. The Pre-Submission Havant Borough Local Plan 2036 can be attributed only limited weight at this point.

The weight given to the emerging allocation must go hand in hand with the weight given to the other policy requirements and standards in the emerging plan; i.e. development in this location can only be considered acceptable where significant efforts have been made to comply with emerging policies requirements. The applicant's statement of conformity with the emerging Local Plan should be used to assess compliance with pertinent emerging policies and inform the planning balance for this application, and for subsequent reserved matters applications.