

PLANNING APPLICATION RESPONSE OF PLANNING POLICY

Application No:	APP/18/01033
Site Address:	Land East of Castle Avenue
Development:	Residential development comprising 69 no. dwellings with access from St George's Avenue together with access, car parking, landscaping, electrical substation and associated works.
Case Officer:	Lewis Oliver
Comments by:	Jacqueline Boulter
Date of Comments:	4 December 2018

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. In addition, the [Local Plan Housing Statement](#) (LPHS), adopted December 2016, and its guiding principles is also a material consideration.

The Council is preparing a new Local Plan and consulted on a Draft (Regulation 18) version of the [Havant Borough Local Plan 2036](#) (HBLP 2036) in early 2018. This included a draft site allocation for the Land East of Castle Avenue (Policy H16). That draft policy sets out development requirements which should be considered during the determination of this application. The council has also published a summary of consultation responses and its proposed way forward for the next stage of the Local Plan, which may also be of relevance¹.

While it is acknowledged that the draft plan has limited weight in decision making at this stage, it is of relevance in setting out the Council's direction of travel. It should also be noted that the next stage, the Regulation 19 Pre-submission Draft of the Local Plan, is currently in the final stages of preparation. Since it is not yet published I have not commented in detail on the provisions of that draft, but it should be noted that it is anticipated that it will be approved by the council's Cabinet on 30 January 2019, and a determination of this application after that date would need to give the emerging plan greater weight. There are a number of new provisions, which this proposal may or may not satisfy, such as minimum densities, 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.

Principle of development

In the adopted local plan, the site lies outside of the urban area as defined by policies CS17 and AL2. 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. However, the land in questions was identified in the Local Plan Housing Statement in table 2 and Guiding Principle 4. This states that: *The principle of residential development on Table 2 sites will be considered favourably in order to contribute towards the objectively assessed housing need and to significantly boost housing supply in the Borough. This material consideration means that there is sufficient weight to justify a departure from Policies CS17 and AL2.* The principle of development is therefore supported in policy terms under adopted policy, and it is anticipated that this will continue as the emerging Local Plan 2036 gains weight.

¹ www.havant.gov.uk/draft-havant-borough-lp-consultation-summary-report-pdf-22-mb.

Infrastructure

Under Guiding Principle 4 of the Local Plan Housing Statement, *proposals coming forward for Table 2 sites will be expected to continue to meet the remaining requirements of the Adopted Local Plan. Such sites will only be agreed in principle if accompanied by an Infrastructure Delivery Statement, produced as agreed by and in collaboration with the Local Planning Authority.*

The applicant has provided an Infrastructure Delivery Statement (IDS), which appears to consider pertinent infrastructure matters. Infrastructure providers' views should be sought to determine whether their requirements are met to address any impacts arising from this proposal.

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 site identified in the Regulation 18 Draft Plan included both the application site and the triangular site to the east. Draft Policy H16 makes clear that one site must not prejudice the delivery of the other. In this context, it should be noted that it is likely that the four-way junction shown on the site plan linking to the adjacent site will be the only access point to the eastern development parcel. Therefore, the LPA needs to be satisfied, with advice from the Highway Authority, that the proposed junction meets design standards to serve the larger site.

It should also be noted, that to the north of the railway line, the council has identified a Strategic Site capable of providing at around 2,100 homes. As part of the delivery package for that site, a new junction on the A27 has been identified. While the location and layout for this junction, its slip roads or connecting roads have not yet been finally determined, it is possible that land at the southern end of this application site could be required. This was highlighted during pre-application discussions, and I am pleased to note that the proposed layout excludes the southern portion of the land, in order to allow further consideration of changes to junctions onto the A27.

Ecology

The site is identified under the adopted Local Plan as being a site possibly used by Brent Geese and waders. Development proposals on, or adjacent to, sites which are used by Solent waders and/or Brent Geese need to be assessed in line with the appropriate regulations. These proposals will, therefore, require a project level Habitats Regulations Assessment (HRA) and, if necessary, an Appropriate Assessment (AA). The Council will consider the Solent Waders and Brent Goose (SWBG) Strategy and the latest survey data when making such an assessment.

Recent survey work suggests that this is a 'low use' site. On low use sites, permission should only be granted where:

- a. On site mitigation is provided which is based upon appropriate ecological assessments to the satisfaction of the Local Planning Authority and Natural England; or
- b. A financial contribution is provided consistent with the Solent Wader and Brent Goose (SWBG) Strategy.

Housing Density

Policy CS9 of the Core Strategy indicates that housing proposals should achieve a suitable density of development for the location. This includes a consideration of the surrounding area, but also, and increasingly so under the new NPPF should consider whether the proposal makes efficient use of land. I consider that the proposal strikes an appropriate balance between these two considerations.

Affordable Housing and Housing Mix

The applicant is providing 14 affordable rent and 6 shared ownership units and claims that the proposal will therefore provide 30% of its housing as affordable (rounded up). However, 30% of 69 dwellings, is 20.7, so to meet the 30% requirement in Policy C9, 21 affordable units would have to be provided. The applicant confirms in their Affordable Housing Statement that the shortfall of 0.7 units will be provided as a financial contribution.

Parking

Policy DM13 and the [Havant Borough Parking SPD \(July 2016\)](#) set out the parking standards for new development in the Borough. The applicant confirms that car and cycle parking has been provided in accordance with this guidance.

Conclusion

The principle of the development of this site is supported in policy terms.

The comments on site specific consideration in this note are based on the current policy position and it should be noted that the emerging Local Plan is likely to gain additional weight in the determination of planning applications at the end of January 2019.