

Planning Application Response of Planning Policy

Application No:	APP/18/00234
Address:	Wellington Way and 95-101A London Road, Waterlooville
Development:	Demolition of existing shopping parade and redevelopment of the site to provide a nine-storey building consisting of 264 no.1 bed/studio build to rent apartments and associated amenity facilities, a D2 gym and A3 café, together with associated parking and landscaping.
Case Officer:	Mr D Eaves
Comments by:	Lewis Ford
Date of Comments:	29 th March 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 Havant Borough. In addition, the [Local Plan Housing Statement \(LPHS\)](#) and its guiding principles, adopted December 2016, is also a material consideration.

The following policies and documents are of relevance:

- CS1 Health and Wellbeing
- CS4 Town, District and Local Centres
- CS6 Regeneration of the Borough
- CS9 Housing
- CS11 Protecting and Enhancing the Special Environment and Heritage of Havant Borough
- CS13 Green Infrastructure
- CS14 Efficient Use of Resources
- CS16 High Quality Design
- CS17 Concentration and Distribution of Development within the Urban Areas
- CS21 Developer Requirements
- DM6 Coordination of Development
- DM8 Conservation, Protection and Enhancement of Existing Natural Features
- DM11 Planning for More Sustainable Travel
- DM12 Mitigating the Impacts of Travel
- DM13 Car and Cycle Parking on Residential Development
- DM24 Recreational Disturbance to Special Protected Areas (SPAs) from Residential Development
- AL2 Urban Area Boundaries and Undeveloped Gaps between Settlements
- AL3 Town, District and Local Centres
- AL5 Cross-Borough Bus Rapid Transport Route
- WA2 Waterlooville Mixed Use Allocations
- Guiding Principle 3 of the LPHS
- Havant Borough Council Housing SPD (July 2011)
- Havant Borough Council Parking SPD (July 2016)

Principle of Development:

The site lies within the urban area as defined by Policies CS17 and AL2 of the Local Plan; these policies seek to concentrate new development within the five urban areas of the Borough. In addition, Policy CS17(2) and Guiding Principle 3 of the LPHS support the promotion/prioritisation of previously developed (brownfield) land. The latter also highlights how this can be achieved by looking at higher densities around town centres and transport hubs.

The site forms part of the allocation referenced as W110 under Policy WA2 of the Local Plan (Allocations Plan). The site-specific requirements are set out on page 91 of the Local Plan.

The site falls within Waterlooville Town Centre as defined by Policies CS4 and AL3, and is within a regeneration zone as outlined by Policy CS6. The latter states that:

“planning permission will be granted for development which positively contributes by type of use and design and by its comprehensive approach to the social, economic and/or physical regeneration of the whole borough”

More specifically, criterion 2) of Policy CS6 outlines the focus for regeneration in Waterlooville Town Centre. It is considered that the proposal could help meet elements set out in sub-criteria 2c) and 2d). These have been replicated below:

- c) Connectivity with Wellington Retail Park
- d) Improved car and cycle parking, public realm and a sustainable mix of uses

Although it would initially appear that the proposal would not be compliant with Policies CS4 and AL3, further evidence obtained from the Havant and Waterlooville Town Centres Study (October 2017) has shown how the proposal is still in line with the criteria set out in these policies. Please see the sections below for further detail.

More explicitly, the proposal would be supported by criterion 5 of Policy CS4 as this encourages high quality, mixed-use development in designated centres that retain active ground floor frontages. An active frontage will be located along Hambledon Road to include a café (A3) and a gym (D2) which can be used by both residents and the public (as confirmed in section 4.1 of the submitted Design & Access Statement). In addition, paragraph 3.54 of the supporting text of this policy states that:

“residential development on upper floors can make an efficient use of town centre land while adding to the mix of dwelling types and tenures available in the borough”.

Coordination of Development:

Policy DM6 refers to the coordination of development. As such, the proposal must not undermine any potential for future development on the remainder of W110. Paragraph 10.20 of the supporting text states:

“The use of urban land should be maximised and carefully planned to ensure the development potential of future sites is not compromised. Proposals should not prevent future access to potential development sites or prejudice future schemes”.

The applicant has considered the above and has demonstrated how the adjacent buildings (which are within the same ownership of the site in question) could be redeveloped in line with the current proposal (see section 9.0 of the submitted Design and Access Statement). The applicant has stated that:

“The exercise shows that the proposals are capable of providing a catalyst for regeneration without sterilisation of the future prospects of adjoining business and townscape”

The plans in section 9.0 demonstrate how pedestrian and cycle access to the remainder of W110 will still be maintained.

The Havant and Waterlooville Town Centre Study:

The [Havant and Waterlooville Town Centres Study](#) was published in October 2017 to inform the Draft Local Plan 2036.

The study sets out a profile of Wellington Way within Table 12 (page 48) and highlights that the area is an enclosed shopping centre built in the 1970s which contains 27 shops and service units. The study highlights that the vacancy rate of Wellington Way was 30% in October 2015 and that this increased to 41% in April 2017. This has been mirrored by a decrease in footfall in the area (albeit a slight peak in 2016) as shown in Figure 19 (page 62) of the study (see footfall station E. Cat Rescue, 8 Wellington Way).

Moreover, in Chapter 16 of the study (Overall Conclusions and Recommendations), bullet point 10 recommends the consideration for targeted regeneration strategies to address underperforming parts of the town centres. It also states that these strategies should be focussed on reducing vacancies through retail, leisure or residential led schemes (where appropriate) that are viable and meet the Council’s long-term aims. Wellington Way is identified as one of these underperforming parts. As such, the proposal is supported in principle by the recommendations of the Havant and Waterlooville Town Centres Study.

In addition to the above, the [Havant Borough Annual Monitoring Report 2017](#) highlights that Waterlooville Town Centre’s overall vacancy rate has continued to increase over the past three years (see Table 5.12, page 29). This has been reproduced below:

Month and Year	Vacancy rate of Waterlooville Town Centre
October 2015	10.31%
October 2016	14.14%
October 2017	17.95%

As of October 2017, the national and south east town centre vacancy average is 9.3% and 7.2% respectively (source: www.spring-board.info). Therefore, Waterlooville Town Centre’s vacancy rate is above the national and regional average.

It is stated in paragraph 10.16 (page 13) of the submitted Planning Statement that:

“As the applicant is the owner of other retail units within Waterlooville, there is the potential to relocate displaced retailers into other vacant units”

This is thoroughly supported as this would ensure that businesses would not be closed/relocated outside of the Borough. In addition, this will help decrease the overall vacancy rate of Waterlooville Town Centre; thus, contributing to its vitality.

Loss of Retail Units:

The proposal would result in the loss of 1,530 square metres of retail units. However, the frontage along Hambledon Road would be retained and include a café (A3) and a gym (D2). The net loss of retail units would normally activate the marketing requirements of Policy DM2 (Protection of Existing Community Facilities and Shops); however, in this instance, DM2 has limited weight due to the high vacancy rate of Waterlooville Town Centre (17.95%) and more specifically, Wellington Way (41%).

Wellington Way is identified in the Adopted Local Plan as a primary shopping frontage under Policy AL3(3). Normally, Policy AL3(3) would seek to protect the loss of A1 units; however, the final paragraph of the policy states that:

“Exceptions to parts (3) and (4) may be made to allow a change of use to non-retail if more than 25% of units in the unbroken run of frontage are vacant at the time of the application”.

With this, Table 16 (page 56) of the Havant and Waterlooville Town Centres Study (link above), outlines the unbroken run of frontages within Waterlooville Town Centre and their vacancies as of April 2017. The run of frontages included in this proposal are:

- | | | |
|--------------------------------------|---|---------------------|
| • P4 – 93-119 London Road (Odd nos.) | - | 29% of units vacant |
| • P6 – 1-11 Wellington Way | - | 30% of units vacant |
| • P7 – 12-21 Wellington Way | - | 57% of units vacant |

As shown above, all the primary frontages included within this proposal have vacancy rates greater than 25%. As such, criteria 3 of Policy AL3 does not apply.

Residential Dwellings:

The proposed uses for W110 in the Local Plan (Allocations Plan) include;

- 1) Housing (no net dwelling increase) and;
- 2) Main town centre uses.

Nevertheless, the LPHS (adopted December 2016) highlights that the objectively assessed need (OAN) for housing has increased in the Borough since the adoption of the Local Plan (Allocation Plan) in July 2014. Therefore, the proposed 264 gross new dwellings will help contribute towards the need of 9,260 net new dwellings in the Borough from 2018 to 2036.

Further to this, Policy CS9, in combination with the [Havant Borough Housing SPD \(July 2016\)](#) and the Ministerial Statement (published summer 2016), requires new developments of over 11 dwellings to contain 30-40% affordable dwellings. However, due to the nature of the Build to Rent (BtR) product, the applicant has confirmed that the proposal is for 264 small residential units, geared to be affordable with access to high quality, centrally managed, facilities. Criterion 3 of Policy CS9 seeks to avoid a concentration of affordable units, however it is considered that the BtR product is an intermediate rather than a long-term housing product; therefore, it may be appropriate to view the proposal as an exception to criterion 3 of Policy CS9. The Council's Housing Officer will be able to provide further clarification and information.

Sustainable Travel:

The site is in a prominent location for easy access to public transport and is within walking distance to community facilities. More specifically, the site is adjacent to the cross-borough bus rapid transport route (Policy AL5) and is adjacent to four bus stops with services to Wecock Farm, Leigh Park District Centre, Havant Town Centre, Portsmouth, Southsea, Horndean, Lovedean, and Clanfield via a variety of bus operators. The site is also adjacent to a sign-posted cycle route, as identified in the [Havant Borough Cycle Network Map 2017](#), and is in close proximity to [National Cycle Route 222](#) which runs north (A3) and south (Stakes Hill Road) of the proposal.

The submitted Transport Assessment and Travel Plan will need to show that the proposal is in accordance with Policies DM11 (Planning for More Sustainable Travel) and DM12 (Mitigating the Impacts of Travel).

Parking Provision:

Policy DM13 and the [Havant Borough Parking SPD \(July 2016\)](#) set out the parking standards for new residential development in the Borough.

a) Cycle Parking

The cycle parking/storage provision for C3 uses can be found in Table 4D (page 13) of the Parking SPD. The applicant has proposed 279 cycle spaces (see section 7.04 of the Design & Access Statement).

As stated in Table 4D, there will need to be 1 long-stay cycle space per one bed unit; as there are more than 264 cycle spaces, the long-stay cycle provision has been met. Nevertheless, it is specified in Table 4D that schemes of 10 or more dwellings will be expected to provide short-term visitor cycle parking at 20% of the long-term standard. This means that the scheme will need to provide 53 short-stay spaces rather than the 15 short-stay spaces currently proposed. As such, the applicant will need to provide 317 cycle spaces in total, in order to meet both the long- and short-stay cycle provision set out in the SPD.

b) Vehicle Parking

The SPD requires 0.6 spaces per 1 bed unit in Waterlooville Town Centre (see Table 4B, page 10). Along with the 20% addition for visitor parking, the proposal would need to provide around 190 vehicle parking spaces.

However, the applicant has put forward evidence to justify that a reduced number of car parking would be acceptable for this build to rent (BtR) product (see paragraphs 10.47-10.50 of the submitted Planning Statement). With this, the proposal includes 18 vehicle parking spaces, along with 50 car parking permits for nearby public car parks and a car club scheme.

It should be highlighted that note 2 (under Table 4B) states that:

“tenure can influence car ownership”, and;

“reductions will only be considered for rented properties where there is evidence that the tenure is unlikely to change or the developers can demonstrate that lower standards would be appropriate”.

Health & Wellbeing:

The proposal includes a communal green space for residents in the centre of the site, along with a roof terrace on the southern block. These amenity spaces, along with the proposed gym, is supported by criteria 3 and 6 of Policy CS1 (Health and Wellbeing).

High Quality Design:

The proposal is a stepped scheme of three blocks which comprises the southern (4-storey), north-eastern (5-storey) and south-western (9-storey) blocks. The proposal will need to comply with Policy CS16 (High Quality Design).

The proposal incorporates units (17%) designed to be wheelchair accessible as stated in paragraph 6.2 (page 8) of the submitted Planning Statement; as such, it is considered that the requirement of criterion 4 is met. In addition, it is considered that the proposal meets the requirements of criteria 1d and 5 of the policy with the potential to meet criterion 6 (see section below). The Council's Landscape Team will be able to provide further advice and determine if the proposal meets criteria 1a, 1b, 1c, 1e and 3 of Policy CS16.

Efficient Use of Resources:

It was previously advised that a fabric first approach along with the use of photovoltaic (PV) panels on the roof to produce renewable energy on-site would help the proposal meet the requirements of Policy CS14 (Efficient Use of Resources).

The applicant has noted emerging Policy E8 in the Draft Havant Borough Local Plan 2036. We are, therefore, pleased to see the incorporation of glazing at the entrance and corridors, as well as the size of windows, so that natural lighting and ventilation is maximised.

We are also pleased to see the incorporation of PV panels on the roof of the south-western block; this is supported by criterion 2 of Policy CS14. However, there is some uncertainty as section 5.0 of the Design & Access Statement implies that the use of PV is definite, whereas section 7.0 (page 34) highlights the "potential" provision of PV panels. It is thoroughly recommended that PV panels are incorporated into the scheme; a pre-commencement condition may be appropriate.

Flooding:

The site is in Flood Zone 1, but is not located in Flood Zones 2 and/or 3.

In combination with the efficient use of resources section above, we are pleased to see the incorporation of a green roof on the north-eastern (5-storey) block; this is supported by Policy CS13. The Planning Policy Team recommends the following pre-commencement condition if the scheme is granted planning permission:

A specification for the green roof must be submitted and agreed in writing with the Local Planning Authority prior to the commencement of the development hereby granted consent. The green roof to the approved specification must be installed and rendered fully operational prior to the first occupation of the development hereby granted consent and retained and maintained thereafter.

The reason:

To reduce flood risk and manage surface water run-off in accordance with core strategy policy CS15, combat the effects of climate change and enhancing energy efficiency through improved insulation in accordance with core strategy policies CS11 and CS14, and contribute to the Borough's green infrastructure in accordance with core strategy policy CS13.

Ecology:

As highlighted in the Preliminary Ecological Appraisal and paragraph 10.62 of the submitted Planning Statement:

- Suitable habitat for roosting bats is present and further surveys will be required to establish their presence/likely absence in buildings that are due to be removed;
- Suitable habitat for breeding birds is present and measures must be taken to avoid killing birds or destroying their nests, and;
- A range of measures should be undertaken to satisfy the requirement for ecological enhancement.

Due to above, the proposal will need to comply with certain criteria from Policies DM8 (criteria 2 and 3) and CS11 (criteria 2 and 8).

Developer Contributions:

Havant Borough Council (HBC) has an adopted CIL Charging Schedule which is applied to new residential development in the Borough in addition to the requirements of Policy CS21.

The Solent Recreation Mitigation Partnership (SRMP) contribution will also be payable in accordance with Policy DM24. The [Solent Recreation Mitigation Strategy](#), and its implementation from 1st April 2018 onwards, was approved by the Council's Cabinet on 7th February 2018. As a decision regarding this application will not be determined until after 1st April 2018, the applicant will need to pay the new financial contribution if permission is granted.

At pre-application, it was suggested that the BtR product could be treated similarly to student accommodation. However, there is now some uncertainty about this approach since the strategy's approval. Further discussions with the Council's CIL Team and Legal Team, along with the Solent Recreation Mitigation Partnership (SRMP), may be required to ascertain the level of financial contribution.

Draft Havant Borough Local Plan 2036:

The Council went out to public consultation with the [Draft Havant Borough Local Plan 2036](#) in January and February 2018. We are pleased to see that the applicant has considered Policies KS2 (Waterlooville Town Centre) and E8 (Low Carbon Design) in their submitted supporting documents.

As shown in proposed Policy KS2, the Council has changed its approach to Waterlooville Town Centre following the publication of the Havant and Waterlooville Town Centres Study in October 2017. The vision for Wellington Way, in the draft plan, is focused on high-quality, high density residential development including more innovative products (see proposed Policy DR1). Moreover, criteria m) to r) of Policy KS2 (pages 31 to 32) sets out the proposed developer requirements for development in this part of the town centre. The proposal will contribute to the delivery of 44% of the 600 new homes proposed within the town centre and, more specifically, has the potential to meet the specifications set out in criteria p) and r).

Recommendation:

Support in principle, providing that the requirements of Policies CS11, CS16, DM8, DM11, DM12 are met as stated above, and the suggested planning condition(s) is included in any planning permission granted.