

Planning Application Response of Planning Policy

Application No:	APP/18/00244
Address:	Colt International Ltd, New Lane, Havant, PO9 2LT
Development:	Mixed residential and employment use
Case Officer:	Mr D Eaves
Comments by:	Jade Ellis
Date of Comments:	9th May 2018

Policy Status:

The Adopted Local Plan:

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) and its guiding principles, adopted December 2016, are also a material consideration.

Havant Borough Local Plan 2036

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) between 8 January to 16 February 2018.

Whilst the Plan has limited weight in decision-making at this stage in the plan preparation, it is of relevance in setting out the Council's direction of travel.

National Planning Policy Framework

Paragraph 22 of the NPPF states that local planning authorities should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purposes. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable communities (paragraph 22).

Principle of development:

The site lies within the urban area as defined by Policies CS17 and AL2 of the Local Plan which seek to concentrate new development within the five urban areas of the borough. There is therefore a presumption in favour of sustainable development, subject to other relevant policy considerations in the Plan.

Emerging site allocation

The Draft Local Plan identifies the site for residential and commercial development under emerging Policy H35 reflecting the need for higher land use values needed to support the redevelopment of the site for employment purposes.

Nevertheless, the Adopted Local Plan remains the starting point in decision-making unless there are material considerations which indicate otherwise. In this respect, the emerging site allocation policy for a mix of residential and commercial uses has limited weight at this stage but does indicate the Council's direction of travel. It also identifies considerations which are

necessary to enable development to come forward in an appropriate and sustainable manner.

Loss of Employment

Policy CS2 of the Core Strategy (2011) states that planning permission will be granted for development proposals that prioritise the use of previously developed land for the provision of new floorspace; and safeguard existing employment sites that are not fit for current purpose.

Policy DM3 which is counterpart to this policy makes clear that the development of land or premises currently or last used for B use class employment purposes to non-B use class employment will only be permitted where it has been demonstrated that the land or premises are not fit for purpose and financially unviable for B use class purposes. An active and exhaustive marketing exercise would normally be required to demonstrate the site is no longer suitable for B use class employment.

The Council recognises there may be material considerations which indicate that it may be appropriate to release the site from wholly B use class employment purposes. In this respect, we have previously indicated there may be justify a deviation from the marketing requirements set out by Policy DM3 where it can be demonstrated that the new employment floorspace will support at least the equivalent number of jobs. This is considered in further detail below.

Number of jobs

The Council's 2017 [Employment Land Review](#) highlights that only a third of the accommodation was occupied prior to the vacation of Colt International. This was indicative of the outdated nature of the buildings which moderated the extent to which the buildings could be occupied prior to their vacation.

The submitted Planning Statement indicates "*at the time the buildings were vacated, there were approximately 100 staff employed at the site*". Paragraph 6.3 of the Planning Statement suggests the proposed units would provide 2,860 sqm and in the region of 120 full time jobs. This compares with the employment density for B2 uses in the [HCA Employment Density Guide](#) (3rd edition) which would support an employment density of 36 sq. m per employee, equivalent to 79 jobs. Though in practice many businesses will comprise different components including supporting office uses (Class B1) which will increase the employment density overall.

Market signals

The ELR also notes that a large part of the site is affected by asbestos content which may undermine the ability to support the comprehensive redevelopment of the site for employment purposes. There would be abnormal costs associated with the decontamination and remediation to enable the site to come forward. As a result, there is limited prospect of the site being retained wholly in employment use in accordance with paragraph 22 of the NPPF. This is reflected in the proposed allocation in the Draft Local Plan for a mixture of residential and commercial uses.

Gateway to New Lane

The submitted Illustrative Masterplan Drawing No. A090070-182[ST1]31 revision A shows the industrial units would front onto New Lane wrapping around the north-eastern corner of the site, with the side elevations facing onto Bartons Road. The scheme would therefore

retain an employment use and act as an important gateway to the wider New Lane industrial area.

Size, format and layout of employment units

The application proposals would include 2,860 sq. m of employment floorspace comprising 10 new units of 286sqm (Use Class B1/B2). The Planning Statement does however refer to Market Assessment Report (not included within the application documentation) which suggests that:

“There is a stated demand for B2 units between 929 sqm and 2,787 sqm (10,000 sq.ft. and 30,000 sq. ft.) and this sector of the market has the most market imbalance between demand and supply.”

This compares with the Council's recommendation between 465 sq. m and 1,855 sq. m, and for a building which would have the ability to be subdivided to satisfy demand for smaller units.

Given the apparent discrepancies between these recommendations and the Market Assessment, we would recommend that further advice is taken from the Economic Development Team accordingly.

Affordable Housing:

Policy CS9 sets out an affordable housing requirement of 30-40% on sites or 15 dwellings (gross) or more. Though the description of the development applies for up to 40% affordable housing, an affordable housing provision of 35% has been assumed for the purposes of the application submission.

The policy also requires a mix of dwelling types, sizes and tenures which would help meet identified local housing need and contribute to the development of mixed and sustainable communities. The Planning Statement suggests the final tenure mix would be determined through further discussions between the Council and the developer – it is recommended that an appropriate condition to require the approval of such details at Reserved Matters stage accordingly.

Parking Provision:

Policy DM13 and the Havant Borough Parking SPD (July 2016) set out the parking standards for new development in the borough.

Flooding:

The vast majority of the site is located in flood zone 1. However, the far south-eastern extent of the site, and the existing access off New Lane falls flood zones 2 and 3. The submitted site-specific Flood Risk Assessment should demonstrate that the development would be safe including access, without increasing flood risk elsewhere in line with Policy CS15.

Developer Contributions:

Havant Borough Council 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 and the Habitats Regulations.

Summary

Whilst a policy objection would normally arise in the absence of an active and exhaustive marketing exercise (as per the requirements of Policies CS2 and DM3), the application proposals would re-provide broadly the equivalent number of jobs. Furthermore, there are market signals which indicate that part of the site should be released from employment purposes.

The application proposals are therefore supported in principle subject to views of the Economic Development Team in terms of whether the size, format and layout of the industrial units would be attractive to prospective occupiers in the locality and the wider Havant locality.