

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, <u>an A2 unit (Financial and Professional Services)</u> together with associated parking and landscaping (alteration underlined)
Case Officer:	Mr D Eaves
Comments by:	Lewis Ford
Date of Comments:	2 nd July 2018

The Planning Policy Team originally responded to the application on 29th March 2018. Since then, further information has been submitted for this application and the team have continued to move forward with the emerging Local Plan 2036. As such, please find below our updated comments.

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 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
- DM21 Shopfronts, Signs, Security Shutters and Advertisements
- 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 Housing SPD \(July 2011\)](#)
- [Havant Borough Parking SPD \(July 2016\)](#)

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, the Draft Local Plan, and particularly emerging policy KS2 (Waterlooville Town Centre), is of relevance in setting out the Council's direction of travel.

Please note, the Council's Local Plan Panel considered a report setting out a summary of the responses to the consultation on the Local Plan and the proposed changes to the policies moving forward. This [Consultation Summary Report](#) was published on the Council's website on Friday 22nd June 2018; a summary of the comments received for KS2, along with Council's proposed actions and amendments, can be found on page 20 to 22 of the report.

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 area of the Borough. The site also forms part of site allocation W110 on page 91, under Policy WA2, of the Local Plan (Allocations Plan). There is, therefore, a presumption in favour of sustainable development, subject to other relevant material considerations in the development plan.

The site is in Waterlooville Town Centre (WTC) as defined by Policies CS4 and AL3 (Town, District and Local Centres). With this, WTC is highlighted as a regeneration area under criterion 2) of Policy CS6 (Regeneration of the Borough). The policy 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”

It is considered that the proposal would contribute to the aims and objectives of the policy, particularly where it would address the areas of focus listed under criterion 2) of Policy CS6. Those of relevance are:

- Integration of Major Development Area (MDA)¹
- Connectivity with Wellington Retail Park
- Improved car and cycle parking, public realm and a sustainable mix of uses

The site's redevelopment is further supported by Policy CS17.4 and Guiding Principle 3 of the LPHS. These cite the Council's support to promote the development of previously developed (brownfield) land by looking at higher densities around town centres and transport hubs.

The proposal would also be supported by Policy CS4.5 as this encourages high quality, mixed-use development in designated centres that retain active ground floor frontages. An active frontage would be located along Hambledon Road and, based on the further information submitted, would include an Estate Agents (A2). Please note, the unit will need

¹ Please note, the MDA is also referred to as “Berewood and Wellington Park” in the Draft Local Plan.

to conform with the provisions of Policy DM21 (Shops, Signs, Security Shutters and Advertisements).

Moreover, paragraph 3.54 of the Local Plan (Core Strategy) 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 the W110 allocation. 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 updated 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 would 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.

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% respectively². Therefore, Waterlooville Town Centre's vacancy rate is above the national and regional average.

Retail Units:

Primary Shopping Frontage

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 WTC 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, criterion 3 of Policy AL3 would not apply.

Loss of retail units

This proposal would result in the loss of 1,530 square metres of retail units, despite the proposal for an Estate Agents (A2) along the frontage of Hambledon Road. As such, the net loss of retail units would activate the marketing requirements of Policy DM2 (Protection of Existing Community Facilities and Shops).

The comments previously submitted by the Planning Policy Team on 29th March 2018 suggested that Policy DM2 had limited weight due to the high vacancy rate of WTC and the fact that the vacancy rate in Wellington Way was 41% (see sub-sections above) which are material in the determination of this application.

Given the proposal would form part of a wider redevelopment, paragraph 10.10 of the Adopted Local Plan (Core Strategy) is also relevant. This states:

"It is recognised that some community facilities [including local shops] are located in areas proposed for redevelopment which can bring about wider community benefits. Where the loss of a facility is proposed as part of a wider redevelopment for which there is a recognised need, justification for the loss of the facility will still be required" (emphasis added).

² Source: www.spring-board.info

Whilst a number of units are still occupied and have not been marketed, paragraph 10.16 (page 13) of the submitted Planning Statement states 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”

The above quote is thoroughly supported as this would ensure that businesses would not be closed/relocated outside of the Borough. Whilst Policy DM2 has relatively limited weight in this particular case, it would be useful if the applicant could provide evidence from the relevant occupiers which confirms that there is available and suitable accommodation which enables them to relocate (either within the applicant's or third-party ownership). This could include letters from the relevant occupiers on company headed paper or electronic correspondence from an official company email address.

The high vacancy rate within this part of the town centre and the relocation of these occupiers elsewhere within the WTC would help decrease vacancies in the town centre overall. On this basis, there are material considerations which indicate that the loss of retail units would deliver wider community benefits and contribute to the vitality and viability of the town centre overall.

Residential Development:

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 Council is preparing a new Local Plan. The site falls within the Wellington Way Car Park area (see Figure 5a, page 34 of the Draft Local Plan) within WTC as defined by Policy KS2 in the Draft Local Plan. This area is identified as no longer serving modern retailer requirements and, as such, offers the potential for high density residential development including more innovative housing products. The redevelopment and construction of 264 new homes would also contribute to the delivery of 600 new homes within the town centre as a whole [criterion m].

Whilst this will be achieved through master planning the WTC area following the adoption of the new Local Plan; it is considered the development proposals would broadly support the aims and objectives of this emerging approach.

Affordable Homes:

Policy CS9, in combination with the [Havant Borough Housing SPD \(July 2016\)](#) and the Ministerial Statement (published summer 2016), require 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 which are 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. It may, therefore, be appropriate to view the proposal as an exception to criterion 3 of Policy CS9. The Council's Housing Enabling Officer will be able to provide further advice on the matter.

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 are supported by criteria 3 and 6 of Policy CS1 (Health and Wellbeing).

High Quality Design and Efficient Use of Resources:

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 of Policy CS16 is met. In addition, it is considered that the proposal meets the requirements of criteria 1d and 5 of Policy CS16 with the potential to meet criterion 6 (see 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.

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 the policies emerging predecessor, Policy E8 (Low Carbon Design) in the Draft Havant Borough Local Plan 2036. The Planning Policy Team 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.

The team 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; and this should be clarified with the applicant accordingly.

Parking:

The advice of the Council's Development Engineer should be sought for further clarification on the below.

Vehicle Parking (General)

Policy DM13 and the [Havant Borough Parking SPD \(July 2016\)](#) set out the parking standards for new residential development in the Borough. The provisions for unallocated residential parking in WTC can be found in Table 4B (page 10) of the SPD (link above).

The SPD requires 0.6 spaces per one-bed unit in WTC. Given that the proposal is for 264 one-bed studio units, the parking requirement for unallocated parking, along with the 20% addition for visitor parking, would be around 190 vehicle parking spaces. Instead, however, the applicant has proposed 18 vehicle parking spaces for a car share club, along with 50 parking permits for car parks around the town centre. The applicant has also put forward evidence to justify that a reduced number of car parking would be acceptable for a Build to Rent (BtR) product³.

³ See paragraphs 10.47-10.50 of the submitted Planning Statement

It should be highlighted that note 2 (under Table 4B) of the Parking SPD 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”.

The Havant Borough Parking SPD acknowledges that WTC provides a variety of bus routes across the Borough and beyond to Portsmouth. It is also acknowledged in the SPD that the WTC provides a range of shops and services which lessen the need for individual travel. Moreover, paragraph 3.04, page 20 of the SPD states that WTC is:

*“considered to be the second most accessible part of the Borough”.*⁴

With this, paragraph 3.05 (page 20) of the Parking SPD states that:

“Proposals within the Havant and Waterlooville Town Centre boundaries will be expected to have a reduced or even zero standard of vehicle parking provision in order to maximise the use of land and discourage the use of private motor vehicles in accordance with the requirements of the NPPF”.

Vehicle Parking for People with Disabilities

Despite the above, the SPD explicitly states within the town centre section (page 20) that suitable parking for people with disabilities should still be provided. The SPD states that disabled people’s car parking spaces should be provided as a ratio of 5%. It is difficult to ascertain a fixed quantity of disabled parking given that the proposal is for a BtR rather than a mainstream housing product. However, as the proposal is proposing a total of 68 vehicle parking spaces⁵ it may be appropriate to base the 5% ratio of this figure. As such, this would mean that 3.4 disabled parking spaces (5% of 68) – or 3 disabled spaces – would need to be provided.

From the above, we request that the provision of 3 disabled parking spaces are sought.

Bicycle Parking/Storage Provision

The bicycle 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.

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, to meet both the long- and short-stay cycle provision set out in the SPD.

⁴ The most accessible and sustainable part of the Borough being Havant Town Centre (HTC)

⁵ Made up of 18 vehicle parking spaces and 50 car parking permits around WTC.

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.

In conjunction with the above, and the comments under the Parking sub-section above, the proposal would be supported by criteria 2), 3) and 6) of Policy CS20 (Transport and Access Strategy). The Council's Development Engineer will be able to provide further advice on how the proposal conforms with policies DM11 and DM12.

Flooding:

The site is not in Flood Zones 2 and/or 3; however, it is in Flood Zone 1.

In combination with the efficient use of resources section above, the Planning Policy Team are pleased to see the incorporation of a sedum roof on the north-eastern (5-storey) block; this is supported by Policy CS13.

The Planning Policy Team recommends the following pre-commencement condition⁶ if the scheme is granted planning permission:

A specification for the sedum roof must be submitted and agreed in writing with the Local Planning Authority prior to the commencement of the development hereby granted consent. The sedum 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.

⁶ Please note, the Town and Country Planning (Pre-Commencement Conditions) Regulations 2018 comes into force on 1st October 2018.

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:

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

The [Solent Recreation Mitigation Strategy](#) was approved, along with its implementation from 1st April 2018 onwards, by Havant Borough's Cabinet on 7th February 2018. As such, the applicant will need to pay the Solent Recreation Mitigation Partnership (SRMP) contribution in line with the strategy and Policy DM24.

Summary:

Support in principle subject to the 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.

In addition to the above; whilst the applicant has indicated that the existing occupiers would likely be relocated to other retail units in their ownership; this should be supported with evidence (from the relevant occupiers) which demonstrates that there is suitable and available evidence which enables them to relocate. It is however, acknowledged that there the development proposal would deliver wider community benefits and contribute to the vitality and viability of the town centre overall.