

Land at Kingscroft Farm, Bedhampton, Havant

Planning Statement

(Incorporating Affordable Housing Statement and Statement of
Community Involvement)

Prepared on behalf of Foreman Homes Ltd

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1.0 INTRODUCTION

- 1.1 Tetra Tech Planning has been instructed by the applicant, Foreman Homes Ltd, to prepare a Planning Statement in support of the submission of an outline planning application made to Havant Borough Council (HBC).
- 1.2 This Planning Statement analyses the application site and surrounding area, sets out the relevant planning history and planning policy context and explains why the proposed development is appropriate, having regard to the key planning policy, technical and environmental considerations.
- 1.3 The application, along with this Planning Statement, is supported by and should be read in conjunction with the suite of plans, reports and other documentation, as set out in the submitted covering letter.

2.0 THE SITE AND SURROUNDINGS

2.1 The site is located within the administrative boundary of HBC.

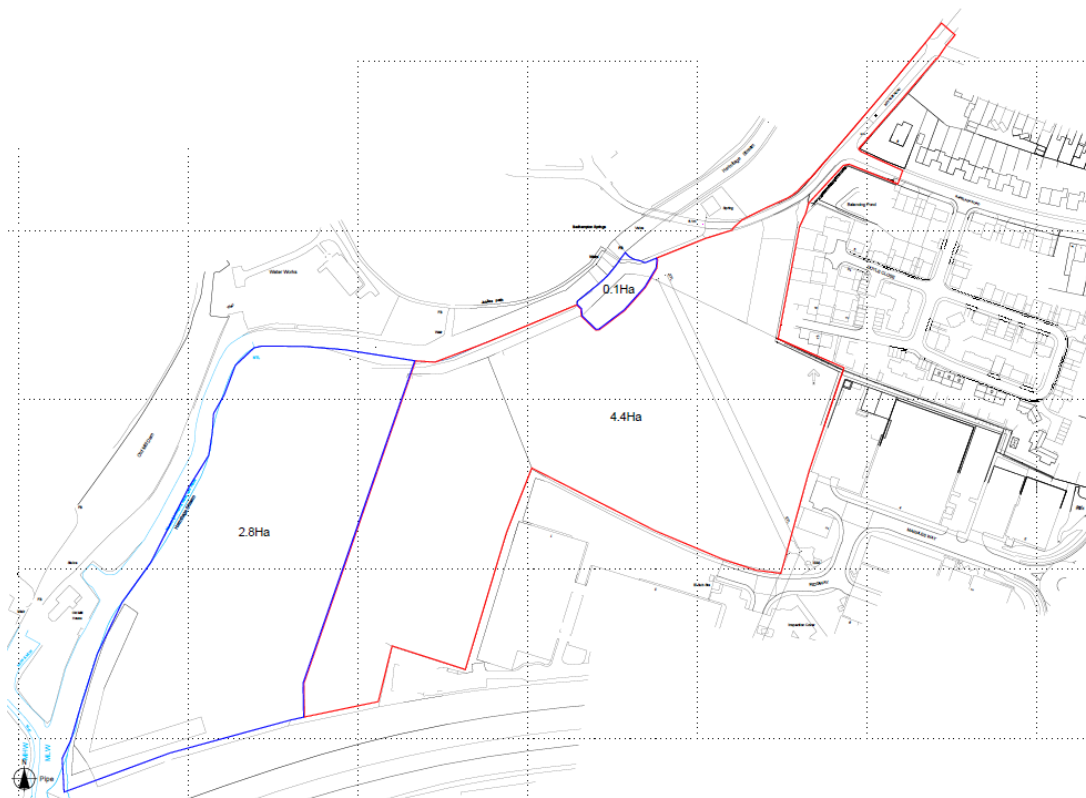
Site Description

2.2 The site is approximately 4.4 hectares in area and comprises agricultural land currently used for grazing.

2.3 The site is well screened, particularly from the south, where there is dense vegetation between the site and the A27. The site boundaries comprise the hermitage stream to the north and west and the A27 Havant Bypass to the south. To the south-east is Marples Way Industrial Estate and to the north-east is a new residential development.

2.4 A Public Right of Way (PROW) footpath runs diagonally through the eastern part of the site (route number 108/35/1). The Government's Flood Map for Planning confirms that the site is in Flood Zone 1 and has a low risk of surface water flooding.

2.5 The site location plan is shown below.



Site Location

- 2.6 The eastern part of the site is located within the urban area (as defined by Local Plan policies CS17 and AL2, which is discussed further in sections 5 and 6), with the remainder outside of the urban area. However, the site immediately adjoins the recently built out new residential development to the north-east.
- 2.7 The Old Bedhampton Conservation Area is to the west of the site, just beyond the hermitage stream. Within this is The Old Mill House, a Grade II Listed Building.
- 2.8 Further beyond the site is Bedhampton to the north, Havant to the east, an industrial estate to the south and undeveloped land to the west.
- 2.9 The site adjoins the A27 and is within close proximity to the A3, providing good links to the local and wider highway network. In addition, Bedhampton train station is within walking distance from the site, approximately 250m to the north with Havant train station only one stop on from that and Havant gives good access on to Petersfield, Guildford and London as well as across country to Chichester, Brighton, Horsham, Gatwick, and London. This gives excellent access to the jobs market.
- 2.10 Situated in-between Bedhampton and Havant town centres, the site is in a highly sustainable location, with good access to a wide range of services and facilities. Havant town centre can be reached on foot in approximately 10 minutes or by bicycle in approximately 4 minutes. Similarly, Bedhampton centre can be reached on foot in approximately 13 minutes or by bicycle in approximately 5 minutes.
- 2.11 There are also bus stops within walking distance of the site, which provides links to Southsea, Portsmouth, Gosport, Fareham, Leigh Park and Hayling Island. A summary of the local bus services operating within the area is provided in the accompanying Transport Assessment.
- 2.12 The site is therefore sustainably located, with easy access to a wide range of services and facilities.

3.0 PLANNING HISTORY

- 3.1 There have been no planning applications at the application site. However, pre-application advice was sought in November 2019, with a written response received in April 2020 for a similar development proposal to that subject of this application. The proposed development has taken on board the helpful pre-application advice received.
- 3.2 In addition, there has been recent planning history adjacent to the site which is of relevance to this application. On 31 July 2013, planning permission was granted for the erection of 79 dwellings, construction of access from Ranelagh Road, provision of landscaping, open space and associated works at Land South of Ranelagh Road, which immediately adjoins the site to the north-east (ref. APP/12/00772). This development has now been built out.

4.0 APPLICATION PROPOSAL

- 4.1 The application submitted is an outline application with all matters reserved except for access. The description of development is:

“Outline planning application with all matters reserved (except for access) for the development of up to 140 residential dwellings (C3 Use), with access from Meyrick Road, the provision of open space, landscaping and other associated works including demolition of existing buildings on site.”

- 4.2 The proposal will include a policy compliant 30% affordable housing provision, as well as a suitable mix of different house sizes and types to cater for local needs. The exact mix will be determined at the detailed Reserved Matters stage.
- 4.3 Access for vehicles will be provided from Meyrick Road, which will also include the main pedestrian access. The existing carriageway will be extended south into the site and the length of Meyrick Road that runs south of the priority junction with Knox Road will be upgraded to provide a 5.5m wide carriageway with a footway on the eastern side provided. Green vehicular and pedestrian corridors are also provided throughout the site.
- 4.4 Also included as part of the proposals are:
- A series of public open spaces and ‘pocket parks’
 - Ecological enhancements
 - New planting and landscaping and retention of existing planting along the boundaries where possible
 - Enhancement of the PROW, including passive surveillance from nearby dwellings
- 4.5 Overall, the proposal will be a high quality, sustainable scheme. Further details of the design proposals are set out in the accompanying Design and Access Statement.

5.0 STATEMENT OF COMMUNITY INVOLVEMENT

- 5.1 Prior to the submission of this application, Foreman Homes Ltd shared the initial proposal at HBC's Development Consultation Forum on 7 January 2020.
- 5.2 At that time, the proposal was for up to 164 dwellings, with access from Abrams Way. However, the proposal has since evolved following further technical work and in response to the helpful feedback received, both through the Development Consultation Forum and from the pre-application advice received.
- 5.3 As a result of such feedback and the further technical work undertaken, the proposal now comprises up to 140 dwellings and the access is now proposed from Meyrick Road.

6.0 PLANNING POLICY CONTEXT

- 6.1 This section sets out the key relevant planning policy at national and local levels. Section 6 sets out how the proposals accord with the key policies in more detail.
- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, in the determination of planning applications, decisions are made in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.3 This section will first note the national policies of relevance before focusing on the local policies considered of most relevance to the consideration of this application.

National Planning Policy Framework (NPPF)

- 6.4 The most recent NPPF was published in July 2021. It sets out the Government's planning policies for England and how these should be applied. It establishes a presumption in favour of sustainable development.
- 6.5 Paragraph 8 confirms that there are three dimensions to sustainable development – economic (building a strong, responsive and competitive economy); social (providing a sufficient number and range of homes to meet the needs of present and future generations and fostering well-designed, beautiful and safe places); and environmental (protect and enhance our natural, built and historic environment). Paragraph 9 confirms that these roles should be delivered through the preparation and implementation of plans and the application of policies but also taking into account local circumstances to reflect the need and opportunities in each area
- 6.6 Paragraph 11 stresses that plans and decisions should apply a presumption in favour of sustainable development. For decision-taking, this means (c) approving development proposals that accord with an up-to-date development plan without delay, or (d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
1. The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 2. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 6.7 Footnote 8 to paragraph 11(d) explains that for proposals involving the provision of housing, local housing policies should be considered out of date where the authority cannot demonstrate a five-year supply of housing or where the Housing Delivery Test indicates that the delivery of housing was less than 75% of the housing requirement over the previous three years. In the case of Havant Borough, both circumstances apply and hence HBC's housing policies must be considered out of date.
- 6.8 Paragraph 33 explains policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary.
- 6.9 Paragraph 38 sets out that Local Planning Authorities should approach decisions in a positive and creative way. This paragraph also states that Planning Authorities should work proactively with applicants to ensure that developments will improve the economic, social and environmental conditions, whilst seeking to approve applications for sustainable development where possible.
- 6.10 Section 5 on housing sets out that the Government is committed to 'significantly boosting the supply of homes' (paragraph 60) in order to meet local needs and help make sure that land with permission is developed without unnecessary delay.
- 6.11 Paragraph 74 states that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.
- 6.12 Paragraph 75 states a five-year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan, or in a subsequent annual position statement which:
- a) Has been produced through engagement with developers and others who have an impact on delivery, and been considered by the Secretary of State; and
 - b) Incorporates the recommendation of the Secretary of State, where the position on specific sites could not be agreed during the engagement process.
- 6.13 Paragraph 76 explains that to maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan in line

with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.

- 6.14 Paragraph 77 states to help ensure that proposals for housing development are implemented in a timely manner, local planning authorities should consider imposing a planning condition providing that development must begin within a timescale shorter than the relevant default period, where this would expedite the development without threatening its deliverability or viability. For major development involving the provision of housing, local planning authorities should assess why an earlier grant of planning permission for a similar development in the same site did not start.
- 6.15 Section 9 relates to promoting sustainable transport. Paragraph 111 states development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Paragraph 113 states all developments that will generate significant amounts of movement should be required to provide a travel plan and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.
- 6.16 Paragraph 111 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 6.17 Paragraph 119 states that planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 6.18 Design is covered in Section 12, where the Government attaches great importance to the design of the built environment. This section highlights that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities (paragraph 126).
- 6.19 Paragraph 167 explains that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment.
- 6.20 Paragraph 174 emphasises the importance of conserving and enhancing the natural environment, more specifically noting that decisions should provide net gains for biodiversity and that planning decisions should prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air

or noise pollution. Development should, wherever possible, help to improve local environmental conditions such as air and water quality.

- 6.21 Paragraph 180 states that developments that conserve or enhance biodiversity should be supported and that opportunities to improve biodiversity in and around developments should be integrated as part of their design.
- 6.22 Paragraph 199 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

National Planning Practice Guidance (NPPG)

- 6.23 The NPPG was published online in March 2014, with periodic updates occurring as national policy is changed or refined. The NPPG is a material consideration in determining planning applications.
- 6.24 It explains the standard method for calculating local housing need provides a minimum number of homes to be planned for. Authorities should use the standard method as the starting point when preparing the housing requirement in their plan, unless exceptional circumstances justify an alternative approach¹.
- 6.25 It states that if an authority cannot demonstrate a 5-year housing land supply, including any appropriate buffer, the presumption in favour of sustainable development will apply, as set out in paragraph 11d of the National Planning Policy Framework².
- 6.26 The NPPG also reaffirms the consequences of failing the Housing Delivery test, including the application of the presumption in favour of development if housing delivery falls below 75%.
- 6.27 The NPPG also includes guidance on various technical matters, such as highways, noise, air quality, drainage, landscape and heritage.

¹ Paragraph 001 Reference ID: 68-001-20190722

² Paragraph 008 Reference ID: 68-008-20180722

National Design Guide and National Model Design Code 2021

- 6.28 The National Design Guide sets out the Government's commitment to achieving better design. A framework for how this will be achieved is provided. Underpinning the guidance are ten characteristics of a well-designed place. These are illustrated below:



- 6.29 The National Model Design Code provides detailed guidance on the production of design codes, guides and policies to promote successful design. It expands upon the ten characteristics of good design set out in the National Design Guide.

Local Planning Policy and Guidance

- 6.30 The relevant parts of the HBC Development Plan currently comprise:

- Local Plan (Core Strategy) adopted March 2011
- Local Plan (Allocations) adopted July 2014
- Hampshire Minerals and Waste Plan adopted 2013

Local Plan (Core Strategy)

- 6.31 As the Local Plan Core Strategy is now more than 5 years old, it has reduced weight in the decision-making process, particularly in regard to how its housing need is calculated which is based on the Standard Method for calculating Housing Need as set out in the PPG. This is confirmed in NPPF paragraphs 11d and 33.

6.32 The following policies within the Core Strategy are considered of most relevance to this application:

- Policy CS9: Housing
- Policy CS11: Protecting and Enhancing the Special Environment and Heritage of Havant Borough
- Policy CS13: Green Infrastructure
- Policy CS15: Flood and Coastal Erosion Risk
- Policy CS16: High Quality Design
- Policy CS17: Concentration and Distribution of Development within the Urban Areas
- Policy CS19: Effective Provision of Infrastructure
- Policy CS20: Transport and Access Strategy
- Policy CS21: Developer Requirements
- Policy DM8: Conservation, Protection and Enhancement of Existing Natural Features
- Policy DM10: Pollution
- Policy DM11: Planning for More Sustainable Travel
- Policy DM12: Mitigating the Impacts of Travel
- Policy DM13: Car and Cycle Parking on Residential Development

6.33 Policy CS9 sets out when planning permission will be granted for housing proposals. One of which is where proposals deliver on average 30-40% affordable housing on sites of 15 or more and secure a suitable contribution, unless a lesser requirement has been transparently justified on viability grounds. It also states that a mix of dwelling types, sizes and tenures should be provided which help meet identified local housing need.

6.34 Policy CS11 explains that planning permission will be granted for development that, inter alia: protects and where possible enhances the borough's statutory and non-statutory designated landscape, habitats and features of biological, hydrological or geological interest, and protects and where appropriate enhances the borough's statutory and non-statutory heritage designations.

6.35 Policy CS13 states that development will be permitted that incorporates, where appropriate, improvements to existing green infrastructure through the restoration, enhancement or creation of additional resources and does not undermine the functional integrity of the green infrastructure.

6.36 Policy CS15 explains that development in areas at risk of flooding now and in the future will only be permitted where the scheme incorporates flood protection, flood resilience and resistance

measures appropriate to the character and biodiversity of the area and the specific requirements of the site. All development will be required to ensure that there is no net increase in surface water run-off.

- 6.37 Policy CS16 requires development to be designed to a high standard, which helps to create places where people want to live, work and relax. Development should demonstrate that its design responds to, draws inspiration from and respects the local context; produces a positive relationship between buildings, streets and spaces; contributes to the improvement of the public realm; is inclusive by considering the needs of those with disabilities; mitigates negative environmental impacts and adapts to the changing needs of the users and changing climate over the lifespan of the building.
- 6.38 Policy CS17 states that development will be permitted that makes the most effective use of land in the borough by granting planning permission that concentrates new housing within the five urban areas (including Havant), as shown on the proposals map.
- 6.39 Policy CS19 states development will be permitted where it safeguards the requirements of infrastructure providers, in particular relating to additional water treatment infrastructure at Kingscroft Farm.
- 6.40 Policy CS20 sets out the transport and access strategy and states that development will be permitted that does not increase congestion and promotes better use of existing transport networks and provides transport management measures to ensure the safe and efficient operation of the strategic and local road network and improves highway.
- 6.41 Policy CS21 explains development will be permitted if on-site and/or off-site infrastructure requirements are met.
- 6.42 Policy DM8 seeks to protect and enhance local habitats and landscape distinctiveness, including sympathetically incorporating existing features into the overall design of the scheme and providing new landscape work.
- 6.43 Policy DM10 states that development that may cause pollution of water, air, or soil or pollution through noise, smell, smoke, fumes, gases, steam, dust, vibration, light heat, electromagnetic radiation and other pollutants will only be permitted if certain criteria can be met, including the health and safety of existing and future users of the site, or nearby occupiers and residents is not put at risk.
- 6.44 Policy DM11 seeks to ensure that every opportunity is taken to increase integration of sustainable travel modes and availability of non-motorised modes by appropriate measures.

- 6.45 Policy DM12 explains that new developments will be required to mitigate their travel impact, including the environmental impacts of travel and impacts on amenity, health and climate change by ensure the criteria within the policy are met.
- 6.46 Policy DM13 states residential development will only be permitted where it provides car parking and cycle storage in accordance with the standards set out in the Residential Car Parking and Cycle Provision Supplementary Planning Document.

Local Plan (Allocations)

- 6.47 The following policies within the Allocations Plan are considered of most relevance to this application:
- Policy AL1: Presumption in Favour of Sustainable Development
 - Policy AL2: Urban Area Boundaries and Undeveloped Gaps between Settlements
 - Policy HB2: Havant and Bedhampton Employment Allocations
 - Policy DM17: Contaminated Land
 - Policy DM18: Protecting New Development from Pollution
 - Policy DM20: Historic Assets
 - Policy DM23: Sites for Brent Geese and Waders
 - Policy DM24: Recreational Disturbance to Special Protected Areas (SPAs) from Residential Development
- 6.48 Policy AL1 sets out the presumption in favour of sustainable development, explaining that the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.
- 6.49 Policy AL2 identifies the urban areas boundaries, including Havant. It states that planning permission will be granted for development within the undeveloped gaps that help to define the separate identity of settlements and prevent their coalescence only if it relates to small scale householder development; meets an overriding public need; or meets the policies for exceptional development in rural areas, set out in the NPPF.
- 6.50 Policy HB2 includes the employment allocations for Havant and Bedhampton, including Kingscroft Farm (ref. BD19). It states that planning permission will be granted provided that the proposals are broadly consistent with the indicative provision for floorspace and take account of all site specific development requirements.

- 6.51 Policy DM17 states planning permission will be granted on or near contaminated land where an appropriate investigation of potential risks is undertaken by the developer and identified risks are mitigated.
- 6.52 Policy DM18 explains planning permission will be granted for development provided that projected levels of air, noise, vibration, light, water or other pollution do not have significant effect on the amenity of future occupiers or users of the proposed development.
- 6.53 Policy DM20 highlights that planning permission will be granted for development that conserves and enhances the historic assets of Havant Borough.
- 6.54 Policy DM23 explains planning permission will be granted for development on or adjacent to uncertain sites for Brent Geese and/or waders outside of the statutory designated areas, where appropriate surveys are undertaken and it is determined that the site has no importance.
- 6.55 Policy DM24 states planning permission will be granted for residential developments that avoid or mitigate a likely significant effect on the SPAs, caused by recreational disturbance through the in-combination effect of net additional dwellings.

Hampshire Minerals and Waste

- 6.56 Policy 15: Safeguarding – mineral resources is the key policy of relevance to this application. This explains that Hampshire's sand and gravel resources are safeguarded against needless sterilization by non-minerals development, unless prior extraction takes place.
- 6.57 The policy goes on to explain that development without the prior extraction of mineral resources in the Mineral Safeguarding Area may be permitted if: it can be demonstrated that the sterilization of mineral resources will not occur; or it would be inappropriate to extract mineral resources at that location, with regard to the other policies in the Plan; or the development would not pose a serious hindrance to mineral development in the vicinity; or the merits of the development outweigh the safeguarding of the mineral.

Emerging Plans

- 6.58 HBC commenced work on a new Local Plan which got to Examination stage. However, the Inspector advised that the draft Local Plan be withdrawn, and a new Local Plan created. A key reason for this was due to an identified shortfall in the supply of housing, particularly in the short term.
- 6.59 HBC are therefore preparing a new Local Plan, however the timetable for the production is not yet available and the emerging Local Plan is given no weight.

Supplementary Planning Documents (SPDs) and Other Guidance Documents

6.60 HBC's SPDs of relevance in this case are:

- Housing Delivery Position Statement (March 2022)
- Borough Design Guide (December 2011)
- Housing (July 2011)
- Parking (July 2016, partially updated September 2019)
- Position Statement and Mitigation Plan for Nutrient Neutral Development
- Developer Contributions Guide
- Flood Risk Sequential Test & Exception Test (October 2020)

7.0 KEY PLANNING CONSIDERATIONS

Principle of Development

Housing Land Supply Position

- 7.1 HBC currently has a housing land supply shortfall and are currently unable to demonstrate a five-year housing land supply (5YHLS). HBC's latest 5YHLS Update note dated November 2021 states that the Council has 3.9 years' supply. This takes into account the Local Plan Inspector's initial findings set out in his interim report.
- 7.2 Furthermore, HBC currently fail the Housing Delivery test, having delivered, in the last three years, only 74% of their housing requirement.³
- 7.3 Footnote 8 to paragraph 11(d) of the NPPF explains that for proposals involving the provision of housing, local housing policies should be considered out of date where the authority cannot demonstrate a five-year supply of housing, or where the Housing Delivery Test indicates that the delivery of housing was less than 75% of the housing requirement over the previous three years. **In the case of HBC, both circumstances apply and hence HBC's housing policies must be considered out of date.**
- 7.4 This significant housing supply shortfall is therefore a key material consideration strongly in favour of this application proposal, as the spatial policies of the out-of-date Local Plan are not delivering the necessary housing. The engagement of both circumstances within footnote 8 highlights the dire housing situation in the Borough and the very substantial weight that should be attributed to the delivery of housing. **Paragraph 11d of the NPPF which sets out the presumption in favour of sustainable development is therefore engaged.**
- 7.5 Paragraph 11d (as also reiterated by policy AL1) states that where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
- i. The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

³ Housing Delivery Test: 2021 measurement

- ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 7.6 The 'areas or assets of particular importance' is defined in the NPPF as relating to habitats sites and/or Sites of Special Scientific Interest (SSSI); Green Belt, Local Green Space, Areas of Outstanding Natural Beauty (AONB); National Park or defined Heritage Coast; irreplaceable habitats; designated heritage assets; and areas at risk of flooding or coastal change. The site is not covered by any of these designations, therefore, the proposal does not impact upon such assets.
- 7.7 This Statement will go on to demonstrate that there are no policies within the Framework that would provide a reason for refusing the proposed development and that the benefits of the proposed development significantly outweigh the impacts of the proposed development.

Housing Delivery Position Statement

- 7.8 HBC have prepared a 'Housing Delivery Position Statement', which was published in March 2022 and is a non-statutory document but forms a material consideration in the determination of planning applications. The purpose of the Statement is to set out how planning applications for housing not in accordance with the Development Plan will be considered in the context of the Council's 5YHLS, the Housing Delivery Test measurement and the NPPF's tilted balance.
- 7.9 Within this there are 6 'decision making principles', which are:
1. Application of the Tilted Balance and the Habitat Regulations;
 2. Sites not in accordance with the Development Plan where the Council accepts the principle of development;
 3. Assessment of summertime transport implications of development on Hayling Island and in Langstone;
 4. Sites not in accordance with the development plan where the principle of development has not been previously identified;
 5. Development quality; and
 6. Southleigh strategic site
- 7.10 Decision making principles 1, 2, 3 and 6 do not apply in this case.
- 7.11 Decision making principle 4 confirms that any submitted planning applications that are in neither the development plan and have not previously been identified (as an allocation in the withdrawn HBLP) will be assessed in line with the tilted balance. It requires applications to demonstrate

that they constitute sustainable development in accordance with the NPPF, by demonstrating that:

- The remaining requirements of the development plan and decision making principles set out in the 'Housing Delivery Position Statement' are complied with; and
- There will not be a significant and demonstrable adverse effect from the development where mitigation is provided to the satisfaction of the local planning authority, taking into account advice from statutory consultees

7.12 In addition to the above, proposals will need to demonstrate they are deliverable in line with the definition in Annex 2 of the NPPF.

7.13 This Statement will go on to demonstrate that the proposal is a sustainable development, assessing the scheme against the local and national policies of relevance and demonstrating compliance. This statement will also demonstrate that there will not be a significant and demonstrable adverse effect from the development.

7.14 In terms of deliverability, this is defined in the NPPF as: *"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years"*. The proposed development fully accords with this in that the site is available now, it is in a suitable location for development now (which is demonstrated throughout this statement) and it is considered realistic that housing will be delivered on the site within five years.

7.15 Decision making principle 5 explains that it is essential that new housing developments are built to a high quality and will stand the test of time. It states that residential development will be expected to:

- a) Provide infrastructure which is needed to make the development acceptable in planning terms, in line with the Council's Infrastructure Delivery Plan and Developer Contributions Guide; and
- b) Are designed to a high standard, and, where relevant, demonstrate that design codes and guides which identify local character and distinctiveness have been taken into account; and
- c) Provide a minimum of 40 dwellings per hectare based on a net developable area, or where relevant, an alternative density based on the site capacity set out in Table 1; and
- d) Create new and improve existing pedestrian and cycle route linkages which connect to all parts of the development and facilitate easy and safe access to education, employment, and the natural environment for all users; and

- e) Incorporate a comprehensive ecological strategy, which achieves biodiversity net gain, and includes, but is not limited to:
 - The retention and integration of any protected trees and hedgerows;
 - The retention and enhancement of any local nature conservation designations on or affected by the development;
 - Mitigation for any protected species, including appropriate buffers;
 - The creation of green linkages and wildlife corridors within and through the site, making the best use of existing natural features
- f) Provide electric vehicle charging infrastructure for each new residential unit with private offstreet parking;
- g) Meet the nationally described space standards for new homes provided;
- h) Provide outdoor private and/or communal amenity space for all residential units;
- i) Achieve a reduction in CO2 emissions of at least 19% of the Dwelling Emission Rate (DER) compared to the Target Emission Rate (TER) of Part L of the Building Regulations;
- j) Provide a drainage strategy suitable to the site which incorporates appropriate Sustainable Drainage Systems (SuDS) to an adoptable standard;
- k) Provide for the sustainable management and maintenance of any new 'common parts' through a legal agreement

In addition to the above, developments of 10 dwellings or more will be expected to:

- l) Provide 30% affordable housing outside of Havant, Waterlooville and Leigh Park town centres; and 20% affordable housing on sites within Havant, Waterlooville and Leigh Park town centres (as defined by TC1, TC2 and TC3 on the Position Statement Maps);
- m) Deliver 30% of homes designed to meet Part M4(2) of the Building Regulations;
- n) Provide a range of dwelling types and sizes to meet local housing need, including 35% of the overall housing mix as two bedroom homes unless locally identified need evidence indicates an alternative approach should be taken.

In addition to the above, developments of 20 dwellings or more will be expected to:

- o) Contribute towards a community officer, to help new residents in the development integrate into existing communities

In addition to the above, developments of 50 dwellings or more will be expected to:

- p) Provide high quality on-site open space to a standard of 1.5ha per 1,000 population; and an element of play where the open space requirement exceeds 0.5ha. On greenfield sites, part of this requirement will be provided in the form of community food growing space, to a standard of at least 0.2ha per 1,000 population;
- q) Deliver 2% of homes designed to meet Part M4(3) of the Building Regulations as part of the affordable housing provision in addition to m)

In addition to the above, developments of 100 dwellings or more will be expected to:

- r) Support local people in accessing employment and skills training either through a financial contribution or a site specific skills and employment plan

- 7.16 Given this is an outline planning application with all matters reserved except for access, the majority of the expectations set out above have not yet been fully incorporated into the proposal, as the proposed site layout is for illustrative purposes only at this stage. However, the proposed development is clearly capable of meeting these expectations, which will be factored into the scheme at reserved matters stage.
- 7.17 The application accords with criterion I, as the proposal includes a policy compliant 30% affordable housing provision.

Urban Areas

- 7.18 Policy CS17 states that development will be permitted that makes the most effective use of land in the borough by granting planning permission that concentrates new housing within the five urban areas (including Havant).
- 7.19 Policy AL2 and the adopted policy map identifies the urban areas boundaries, which includes Havant. The policy also states that planning permission will be granted for development within the undeveloped gaps that help to define the separate identity of settlements and prevent their coalescence only if it relates to small scale householder development; meets an overriding public need; or meets the policies for exceptional development in rural areas, set out in the NPPF.
- 7.20 The application partially accords with these policies, with the eastern part of the site being located within this urban area boundary. The remainder falls just outside of the boundary, however the site immediately adjoins the recently built out new residential development to the north-east, functionally and visually forming part of the urban area.
- 7.21 In any case, HBC cannot currently demonstrate a 5YHLS, meaning the weight to be attached to these policies is significantly reduced and the support for a site in such a highly sustainable location should receive significant weight.

Site Allocation

- 7.22 In the adopted Allocations Local Plan, the north-eastern part of the site is allocated for employment use through policy HB2 (site reference BD19). Within this it confirms that the site is within walking distance to the railway station, local bus services and Havant town centre, therefore in a highly sustainable location.

- 7.23 This allocation confirms that HBC consider the principle of developing the site acceptable (albeit with employment use).
- 7.24 Although a proportion of the proposed development is contrary to policy HB2, the Local Plan Core Strategy is now more than 5 years old, meaning it has reduced weight in the decision-making process.
- 7.25 It is also important to note that the site was previously allocated for residential development in a draft version of the emerging Local Plan, as it was considered there is no reasonable prospect of the site coming forward for employment use. However, it was not taken forward for a residential allocation on the grounds of flood risk, due to it not being possible at the time to conclude that there is a reasonable prospect of safe development. However, it was suggested that hydraulic modelling is needed to establish the extent of the future flood zones and that such further work may be able to conclude that safe delivery is possible. This is set out within HBC's Strategic Flood Risk Assessment (2018) (reference HB63). This is discussed further later in this section of this Statement.
- 7.26 The principle of residential development on the site was therefore accepted by HBC as suitable, subject to the matter of flood risk being resolved.
- 7.27 The proposed development is therefore partially in accordance with the key spatial policies of the HBC Local Plan, albeit there is some conflict with elements of policies CS17, AL2 and HB2. However as explained above, HBC cannot demonstrate a 5YHLS and therefore the weight to be attached to such policies is significantly reduced.

Flood Risk and Drainage

- 7.28 This application is accompanied by a Flood Risk Assessment and Drainage Strategy. This confirms that as the site is in Flood Zone 1, a sequential test is not required. Although in Flood Zone 1, some of the proposed buildings are within the Climate Change Flood Outline and therefore finished floor levels will be set 300mm above flood levels and floodplain compensation is proposed, the details of which will be put forward at reserved matters stage.
- 7.29 In terms of the surface water drainage strategy, this will comprise a combination of discharging surface water run off to the existing watercourse (Hermitage stream) to the west of the site, and to the existing Southern Water surface water sewer immediately to the south of the site via a sewer requisition. Surface water will be attenuated within Sustainable Urban Drainage features prior to being discharged to the watercourse and sewer.

- 7.30 In terms of the foul water drainage strategy, this will comprise foul flows from the development discharging into the existing Southern Water foul sewer to the east of the site.
- 7.31 In conclusion, the Flood Risk Assessment and Drainage Strategy demonstrates that the proposals are consistent with the aims of the NPPF and HBC's Development Plan and the site would not be at risk of flooding or increase the flood risk to others.
- 7.32 Pre-application discussions were also held on 25 May 2022 with the Environment Agency (EA). The culverted watercourse that runs through the site was discussed, and this has been incorporated into the proposal through ensuring an appropriate 5-8 metre buffer from the proposed road. The EA were generally satisfied with the proposal.

Ecology

- 7.33 The site is identified in the adopted policy map as being an uncertain site for Brent Geese and Waders. Policy DM23 explains planning permission will be granted for development on or adjacent to uncertain sites for Brent Geese and/or waders outside of the statutory designated areas, where appropriate surveys are undertaken and it is determined that the site has no importance
- 7.34 The Preliminary Ecological Appraisal (PEA) submitted with this application includes a map provided by Hampshire Biodiversity Information Centre, which includes the Solent Wader and Brent Geese sites. This confirms that the entire site has only negative records for the species.
- 7.35 As part of the PEA, a desktop survey, Phase I habitat survey and preliminary roost assessment were undertaken. Following the survey work, it was concluded that in the absence of any mitigation measures, the proposed development is anticipated to result in 'certain adverse effects'. Suitable mitigation measures have been outlined within the PEA and Reptile Survey which will ensure any harm is avoided as a result of the proposed development.
- 7.36 The proposed development is within 5.6km of Chichester and Langstone Harbour, a Special Protection Area and Ramsar Site. Therefore to mitigate offsite impacts of the development, contributions will be made in accordance with the Solent Recreation Mitigation Strategy and policy DM24.
- 7.37 A Nutrient budget calculation has also been submitted with this application showing a net increase in nitrates as a result of the development. The applicant is exploring options to offset the nitrates, with further details to follow shortly.

- 7.38 Overall, the proposal therefore accords with policy CS11 which requires development to protect and where possible enhance the borough's statutory and non-statutory designated habitats.

Highways

- 7.39 This application is accompanied by a Transport Assessment (TA) which reviews the existing transport conditions in the vicinity of the site and assesses the potential effects of the development on the local highway network.
- 7.40 It explains that access for vehicles will be provided from Meyrick Road, which will also include the main pedestrian access. The existing carriageway will be extended south into the site and the length of Meyrick Road that runs south of the priority junction with Knox Road will be upgraded to provide a 5.5m wide carriageway with a footway on the eastern side provided.
- 7.41 In addition to upgrading Meyrick Road, a circa 30m length of Ranelagh Road (east of the priority junction with Meyrick Road) will be upgraded to a width of 5.5m and will include a 2m wide footway extension to connect to the existing provision to the east.
- 7.42 On the eastern side of the site access road, a 2m wide footway will be provided that will extend along the eastern side of Meyrick Road and tie into the existing footway on the southern side of Knox Road. Dropped kerb pedestrian crossings will also be provided across Meyrick Road, the bellmouth of Knox Road and the bellmouth of Ranelagh Road to facilitate pedestrian movements to/from the site.
- 7.43 Precise details on car and cycle parking provision and electric vehicle charging provision will be provided at Reserved Matters stage.
- 7.44 The TA demonstrates that the site is in an accessible location with a large range of everyday facilities located within a reasonable walking and cycling distance of the site. The TA concludes that there are genuine opportunities for travel to and from the site using sustainable transport modes; that safe and suitable access can be provided to the development for all users; and that the local highway network can accommodate the traffic generated by the development without leading to any significant (let alone 'severe') impact on operation or safety.
- 7.45 The proposals are therefore in accordance with policy CS20, which requires development not to not increase congestion and ensures the safe and efficient operation of the strategic and local road network and improves highway.
- 7.46 The application is also accompanied by a Travel Plan (TP). The aim of the TP is to reduce single occupancy car use for travel to the site. Measures are proposed to promote the use of walking,

cycling and public transport amongst new residents for local journeys and to make more efficient use of the private car through the development of car sharing.

- 7.47 Monitoring will take place for the duration of the build programme and until five years after first occupation. The results will be included in an updated TP, with TP targets updated accordingly. The results will also form the basis of discussions with HBC and the highway authority to examine how the TP is continuing to influence travel behaviour and to discuss alternative measures that could be incorporated into the plan to achieve further success.
- 7.48 The TP accords with policy CS20 which requires development to promote better use of existing transport networks and provide transport management measures, with policy DM11 which seeks to ensure that every opportunity is taken to increase integration of sustainable travel modes and availability of non-motorised modes by appropriate measures, and with policy DM12, which requires developments to mitigate their travel impact, including the environmental impacts of travel and impacts on amenity, health and climate change.

Air Quality and Noise

- 7.49 A Noise Impact Assessment has been submitted with this application. Environmental noise surveys were undertaken to quantify the existing levels of background and ambient noise as well as noise associated with the adjacent commercial and industrial premises. In addition surveys were undertaken to quantify road traffic noise from the A27 Havant Bypass to the south of the site and from the train line to the north-west of the site.
- 7.50 In summary, the assessment has been based on robust and worst-case assumptions and demonstrates that subject to the incorporated mitigation measures suggested there should not be any adverse impact due to the existing noise sources. Such mitigation measures include higher specification glazing and an alternative scheme of ventilation.
- 7.51 In terms of air quality, an Air Quality Assessment (AQA) has also been submitted with this application as the proposals have the potential to cause air quality impacts as a result of fugitive dust emissions during construction and road traffic exhaust emissions associated with vehicles travelling to and from the site during operation, as well as the exposure of future residents to elevated pollution levels.
- 7.52 The AQA explains that during construction phase, it has been found that assuming good practice dust control measures are implemented, the residual significance of potential air quality impact is predicted to be not significant.

- 7.53 Dispersion modelling was undertaken in relation to the operational phase impacts, including road traffic exhaust emissions from the local highway network. The results of this indicate that emissions generated were predicted to be negligible and overall, the site is considered to be suitable for the proposed use from an air quality perspective.
- 7.54 The proposal therefore accords with policy DM18 which states that planning permission will be granted provided that projected levels of air and noise pollution do not have significant negative affects on the amenity of future occupiers or users of the proposed development.
- 7.55 The proposal also ensures accordance with policy DM10, which states that development that may cause pollution through noise, smell, smoke, fumes, gases, steam, dust, vibration, light heat, electromagnetic radiation and other pollutants will only be permitted if certain criteria can be met, including the health and safety of existing and future users of the site, or nearby occupiers and residents is not put at risk.

Heritage and Archaeology

- 7.56 The site does not contain any designated heritage assets or known archaeological remains. An Archaeological Desk-Based Assessment has been submitted with this application. It concludes that there is high potential for pre-historic remains in the site, however there is no archaeological reason for the proposed development to be constrained or hindered.
- 7.57 The Assessment recommends that before any development commences, a programme of archaeological work should be carried out in order to secure the preservation of any archaeological remains by record.
- 7.58 In addition, the Assessment explains that on sites where existence of archaeological remains are not proven, but are likely, it is recommended that an archaeological evaluation by trial trenching is an effective way of mitigating risk.
- 7.59 There are neither any heritage assets on the application site, nor any in close vicinity. The closest heritage assets are 'The Old Mill House', a Grade II Listed building and the Old Bedhampton Conservation Area, which are located to the west of the site, beyond the hermitage stream with an intervening field in-between. In addition, there is existing development comprising housing and an industrial estate immediately adjacent to the application site, with Brockhampton Conservation Area to the east beyond this.
- 7.60 The proposed scheme has evolved since receiving pre-application advice from HBC in April 2020. At that time, the proposal was for up to 164 dwellings, with access from Abrams Way.

However, the proposal now comprises up to 140 dwellings and the access is now proposed from Meyrick Road. This is an improvement in heritage terms as the proposed access from Meyrick Road is not within the Brockhampton Conservation Area, whereas the previously proposed access from Abrams Way would have meant vehicular movements in and out of Brockhampton Conservation Area.

- 7.61 As such, the proposed development will not affect such heritage assets, given the proposed access is no longer within the Conservation Area, the distance between the heritage assets and the site and the context of existing built development neighbouring the site.
- 7.62 The proposal is therefore in accordance with policy DM20, which highlights that planning permission will be granted for development that conserves and enhances the historic assets of Havant Borough.

Landscape and Trees

- 7.63 This application is accompanied by a Preliminary Arboricultural Impact Assessment, including a tree constraints plan and tree retention and removal plan. This confirms that only low value trees will be removed to accommodate the proposed development. New planting and landscaping is also proposed, with full details to be provided at Reserve Matters stage.
- 7.64 In addition, a series of public open spaces and 'pocket parks' is proposed throughout the site and existing planting along the boundaries is to be retained where possible to ensure a good level of screening. Overall, the proposal will be a high quality, sustainable scheme. Further details of the design proposals are set out in the accompanying Design and Access Statement.
- 7.65 The proposal accords with relevant policies CS11, CS13 and DM8 in that it protects and enhances the landscape and distinctiveness, provides new landscape work and incorporates existing features into the overall design of the scheme.

Mineral Safeguarding

- 7.66 The site is within a Mineral Safeguarding Area, as defined by the Hampshire and Minerals Waste Plan. This is because it is likely to be underlain by sand and gravel.
- 7.67 Policy 15 of the Hampshire and Minerals Waste Plan explains that development without the prior extraction of mineral resources in the Mineral Safeguarding Area may be permitted if:
- it can be demonstrated that the sterilization of mineral resources will not occur; or

- it would be inappropriate to extract mineral resources at that location, with regard to the other policies in the Plan; or
- the development would not pose a serious hindrance to mineral development in the vicinity; or
- the merits of the development outweigh the safeguarding of the mineral

7.68 Although there is a shortage of sand and gravel, the loss of the application site, which extends to just 4.4ha and is already allocated for employment use through policy HB2 (site reference BD19), is not considered to be significant enough to undermine this resource.

7.69 Given the size of the development and the proximity of existing housing to the north-east, it is not practical, realistic or cost-effective to extract the mineral from the site. It is considered the merits of the development outweigh the safeguarding of the mineral, in accordance with policy 15 of the Hampshire and Minerals Waste Plan.

Planning Balance

7.70 At the heart of the NPPF is a presumption in favour of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives which are interdependent and need to be pursued in mutually supportive ways. These are social, economic and environmental objectives⁴.

7.71 The proposed development would result in social benefits through:

- The provision of up to 140 dwellings to add to the much-needed housing stock in the Borough, in a highly sustainable location;
- The provision of policy-compliant level of affordable housing, as well as a suitable mix of tenures and houses sizes to cater to local needs (the precise details can be confirmed at Reserved Matters stage);
- Public open space provision for the enjoyment of future residents;
- Enhancement of the PROW, including passive surveillance from nearby dwellings; and
- A highly sustainable location with access to a wide range of services and facilities within walking and cycling distance of the site

7.72 The proposed development would result in economic benefits through:

⁴ NPPF paragraph 8

- The scheme would generate employment related to the construction of the proposed development;
- Future residents would contribute to the local economy; and
- Good access to employment opportunities due to the site's close proximity to Marple's Way Industrial Estate and Bedhampton and Havant town centres

7.73 The proposed development would create environmental benefits through:

- The development will be carefully landscaped and designed to a high quality, ensuring it respects and is reflective of the local area;
- The retention of existing planting along the boundaries where possible; and
- Provision of ecological enhancement measures, including mitigation measures to prevent harm to sensitive habitats

7.74 It is therefore evident that the proposal would bring about multiple benefits, particularly the provision of much needed housing (both affordable and market). It represents a logical extension to the adjacent recently built out new residential development to the north-east. The principle of residential development on the site has also previously been accepted by HBC as suitable, subject to the matter of flood risk being resolved, which this planning application demonstrates.

7.75 Furthermore, HBC's housing policies are out of date and therefore the NPPF paragraph 11d is clear that permission should be granted unless 'any adverse impacts of doing so would significantly and demonstrably outweigh the benefits'.

7.76 Accordingly, in weighing the planning balance, the proposed development would not result in any adverse impacts which would significantly and demonstrably outweigh the identified social, economic and environmental benefits. Therefore, in accordance with NPPF paragraph 11d, there is no clear reason for refusing the proposed development hence planning permission should be granted.

8.0 AFFORDABLE AND MARKET HOUSING STATEMENT

Affordable Housing

- 8.1 Policy CS9 states that planning permission will be granted for housing proposals that will deliver on average 30-40% affordable housing on sites of 15 dwellings or more.
- 8.2 The proposal will include a policy compliant 30% affordable housing provision, as well as a suitable mix of different house sizes and types to cater to local needs. This represents a significant public benefit which carried substantial weight in the planning balance.

Market Housing

- 8.3 Policy CS9 also states that planning permission will be granted for housing proposals that will ensure mixed communities are created through the planned distribution and avoidance of a concentration of affordable housing, and provide a mix of dwelling types, sizes and tenures which help meet identified local housing need and contribute to the development of mixed and sustainable communities.
- 8.4 The proposed development will provide such a suitable mix and distribution to best meet local needs, with the exact mix to be determined at the detailed Reserved Matters stage.
- 8.5 The delivery of market housing, alongside policy compliant levels of affordable housing, will enable a substantial boost to local housing delivery. This carries significant weight in the planning balance, given HBC's lack of a 5YHLS.

9.0 SUMMARY AND CONCLUSION

- 9.1 Tetra Tech Planning have prepared this Planning Statement in support of the submission of an outline planning application on behalf of the applicant, Foreman Homes Ltd.
- 9.2 The proposed development comprises:
- “Outline planning application with all matters reserved (except for access) for the development of up to 140 residential dwellings (C3 Use), with access from Meyrick Road, the provision of open space, landscaping and other associated works including demolition of existing buildings on site.”*
- 9.3 HBC cannot currently demonstrate a 5YHLS and have failed the Housing Delivery test over the last three years. This means that the weight to be attached to policies concerning the delivery of new housing is reduced as they are considered out of date. The provisions of paragraph 11d of the NPPF – the presumption in favour of sustainable development and the tilted balance is engaged.
- 9.4 This Statement has demonstrated the significant benefits the proposal would offer, and it is clear the proposed development would not result in any adverse impacts which would significantly and demonstrably outweigh the identified social, economic and environmental benefits.
- 9.5 Therefore having regard to the Development Plan, the NPPF and other material considerations identified, planning permission should be granted.