

# **Land off Palk Road, Bedhampton**

## **Planning Statement**

(Incorporating Affordable Housing Statement, Statement of Community Involvement, S106 Heads of Terms and Sustainability and Energy Statement)

Prepared on behalf of Bellway Homes Limited

December 2022

# Document control

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## CONTENTS

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|                                                   |    |
|---------------------------------------------------|----|
| Contents.....                                     | 1  |
| 1.0 Introduction .....                            | 2  |
| 2.0 The Site and Surroundings .....               | 3  |
| 3.0 Planning History .....                        | 5  |
| 4.0 Application Proposal .....                    | 6  |
| 5.0 Statement of Community Involvement.....       | 11 |
| 6.0 Key Planning Considerations .....             | 12 |
| 7.0 Affordable and Market Housing Statement ..... | 26 |
| 8.0 S106 Heads of Terms .....                     | 28 |
| 9.0 Summary and Conclusion .....                  | 29 |
| Appendices .....                                  | 31 |
| Appendix A – Pre-application and DCF Schedule     |    |
| Appendix B - List of relevant policies            |    |
| Appendix C – Sustainability and Energy Statement  |    |
| Appendix D – Affordable Housing Plan              |    |

## 1.0 INTRODUCTION

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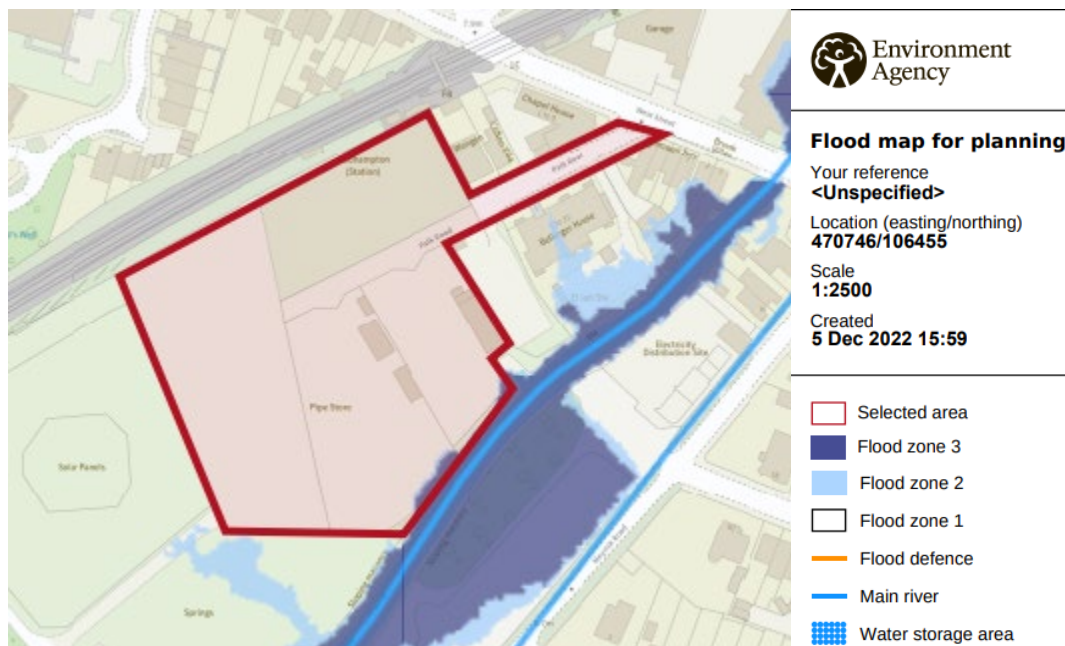
- 1.1 Tetra Tech Planning has been instructed by the applicant, Bellway Homes Limited, to prepare a Planning Statement in support of the submission of a full planning application made to Havant Borough Council (HBC).
- 1.2 This Planning Statement describes the application site and surrounding area, sets out the relevant planning history and explains why the proposed development is appropriate, having regard to the key planning policies, 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 jurisdiction of HBC and within the ward of St Faith's.

### Site Description and Location

- 2.2 The site is approximately 1.17 hectares and is a brownfield site comprising vacant scrubland and B8 storage use for storage of materials by Portsmouth Water, Palette Storage and JD Pipes, which is now surplus to Portsmouth Water's requirements.
- 2.3 The site is bounded to the north by Bedhampton Station and the railway line, to the east is West Street, to the south is the Hermitage Stream and to the west is open land, solar panels and a water treatment works. Beyond the immediate surrounds is residential and commercial development with Havant town centre a short walk to the east.
- 2.4 The site is located within the urban edge and defined settlement boundary. The northern part of the site forms the residential allocation Policy H19 which has an indicated yield of 21 dwellings.
- 2.5 There are no designated heritage assets at the site. Old Bedhampton Conservation Area is over 100m north-west and west of the site and Brockhampton Conservation Area is approximately 200m to the east.
- 2.6 According to the Environment Agency's Flood Map for Planning, the majority of the site is in flood zone 1, with a small part of the site at the south within flood zones 2 and 3, see map below.



- 2.7 There are no public rights of way within or adjoining the site.
- 2.8 The site is in a highly sustainable location and is well connected to services and facilities. Approximately 1km to the east is the main urban retail high street. The table below sets out the local services and

facilities and their distances from the site. Further information on this can be found in the submitted Transport Assessment prepared by Paul Basham Associates.

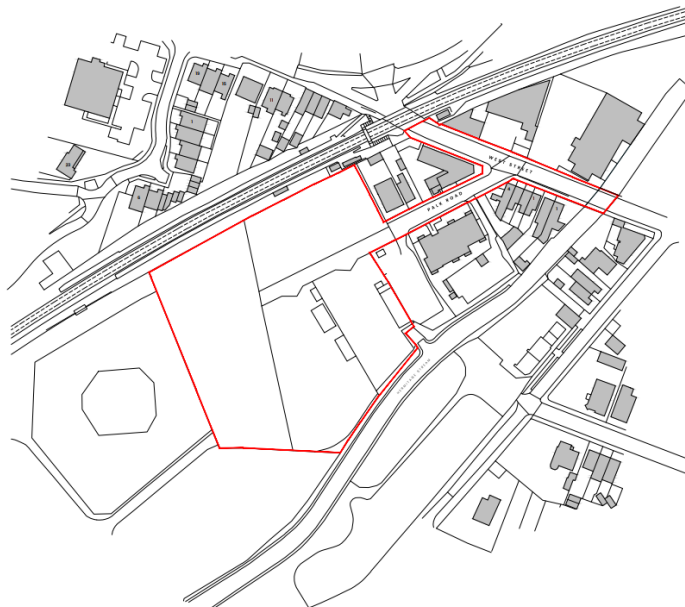
| Facility                               | Destination | Walk Time    | Cycle Time  |
|----------------------------------------|-------------|--------------|-------------|
| Bedhampton Railway Station             | 240m        | 3 minutes    | 1 minute    |
| Brunswick Gardens Bus Stop (Eastbound) | 360m        | 4 ½ minutes  | 1 minute    |
| Brunswick Gardens Bus Stop (Westbound) | 410m        | 5 minutes    | 1 ½ minutes |
| Bedhampton Community Centre            | 410m        | 5 minutes    | 1 ½ minutes |
| Convenience Store                      | 560m        | 6 ½ minutes  | 2 minutes   |
| Aldi                                   | 910m        | 11 minutes   | 3 minutes   |
| High Street                            | 1km         | 12 minutes   | 3 ½ minutes |
| Bedhampton Post Office                 | 1.1km       | 12 ½ minutes | 3 ½ minutes |
| Bidbury Infant School                  | 1.1km       | 13 minutes   | 3 ½ minutes |
| Bidbury Junior School                  | 1.1km       | 13 minutes   | 3 ½ minutes |
| Havant Park                            | 1.2km       | 13 minutes   | 3 ½ minutes |
| The Meridian Centre                    | 1.3km       | 15 ½ minutes | 4 ½ minutes |
| Havant Railway Station                 | 1.4km       | 18 minutes   | 5 minutes   |

**Table 2:** Local Facilities

(Walking and Cycling speeds based upon CIHT guidance - Walking speed 1.4m/s and Cycling speed 5m/s)

2.9 As can be seen from the above table, the site is in a very accessible location in close proximity to a wide range of services, facilities and employment opportunities.

2.10 The site location plan is shown below.



### 3.0 PLANNING HISTORY

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- 3.1 The following recent planning history is of relevance to this planning application and is summarised below.

| Application Reference | Description                                                                                                     | Decision                                  |
|-----------------------|-----------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| APP/17/00237          | Temporary Change of Use to Open Storage (B8 use), the addition of two portacabins and associated hard standing. | Grant Temporary Permission<br>24 May 2017 |
| APP/15/00447          | Change of Use to Open Storage (B8 use), the addition of two portacabins and associated hard standing.           | Permitted 17 July 2015                    |

- 3.2 Pre-application advice was sought in January 2022, with a written response received in April 2022 for a similar proposal, but for 92 residential dwellings. The proposed development has taken on board the helpful advice received. This is discussed further in section 5.0.

## 4.0 APPLICATION PROPOSAL

4.1 The application is for full planning permission and the description of development is:

*“Full planning application for the redevelopment of a brownfield site to include the provision of 90 residential dwellings (including 27 affordable units) (C3 use), parking, public open space, landscaping and other associated works, including demolition of existing buildings on site, with access from Palk Road”.*

4.2 The proposal makes an efficient use of previously developed land by removing a noise-generating and unsightly use which is surplus to requirements and replacing it with 90 much needed high-quality homes within an attractive landscaped setting.

4.3 30% affordable housing is proposed, as well as a suitable mix of apartment sizes to cater to local needs. The overall proposed schedule of accommodation is set out below and comprises four apartment blocks.

| Plot | Location          | Tenure           | Reference |
|------|-------------------|------------------|-----------|
| 1    | Apartment Block A | Affordable M4(3) | 2B3P      |
| 2    | Apartment Block A | Affordable M4(3) | 1B2P      |
| 3    | Apartment Block A | Affordable M4(3) | 1B2P      |
| 4    | Apartment Block A | Affordable M4(3) | 1B2P      |
| 5    | Apartment Block A | Affordable M4(3) | 3B6P      |
| 6    | Apartment Block A | Affordable       | 2B4P      |
| 7    | Apartment Block A | Affordable       | 1B2P      |
| 8    | Apartment Block A | Affordable       | 1B2P      |
| 9    | Apartment Block A | Affordable       | 1B2P      |
| 10   | Apartment Block A | Affordable       | 2B4P      |
| 11   | Apartment Block A | Affordable       | 2B4P      |
| 12   | Apartment Block A | Affordable       | 2B4P      |
| 13   | Apartment Block A | Affordable       | 1B2P      |
| 14   | Apartment Block A | Affordable       | 1B2P      |
| 15   | Apartment Block A | Affordable       | 1B2P      |

|    |                   |                |      |
|----|-------------------|----------------|------|
| 16 | Apartment Block A | Affordable     | 3B6P |
| 17 | Apartment Block A | Affordable     | 2B3P |
| 18 | Apartment Block A | Affordable     | 1B2P |
| 19 | Apartment Block A | Affordable     | 2B4P |
| 20 | Apartment Block B | Private        | 2B4P |
| 21 | Apartment Block B | Affordable S/O | 3B5P |
| 22 | Apartment Block B | Affordable S/O | 2B4P |
| 23 | Apartment Block B | Private        | 1B2P |
| 24 | Apartment Block B | Private        | 1B2P |
| 25 | Apartment Block B | Affordable S/O | 1B2P |
| 26 | Apartment Block B | Affordable S/O | 2B4P |
| 27 | Apartment Block B | Affordable S/O | 2B4P |
| 28 | Apartment Block B | Private        | 1B2P |
| 29 | Apartment Block B | Private        | 1B2P |
| 30 | Apartment Block B | Affordable S/O | 1B2P |
| 31 | Apartment Block B | Affordable S/O | 2B4P |
| 32 | Apartment Block B | Affordable S/O | 1B2P |
| 33 | Apartment Block B | Private        | 1B2P |
| 34 | Apartment Block B | Private        | 1B2P |
| 35 | Apartment Block B | Private        | 1B2P |
| 36 | Apartment Block B | Private        | 2B4P |
| 37 | Apartment Block C | Private        | 3B5P |
| 38 | Apartment Block C | Private        | 1B2P |
| 39 | Apartment Block C | Private        | 2B4P |
| 40 | Apartment Block C | Private        | 2B4P |
| 41 | Apartment Block C | Private        | 2B4P |
| 42 | Apartment Block C | Private        | 2B4P |

|    |                   |         |      |
|----|-------------------|---------|------|
| 43 | Apartment Block C | Private | 2B4P |
| 44 | Apartment Block C | Private | 3B5P |
| 45 | Apartment Block C | Private | 1B2P |
| 46 | Apartment Block C | Private | 1B2P |
| 47 | Apartment Block C | Private | 2B4P |
| 48 | Apartment Block C | Private | 2B3P |
| 49 | Apartment Block C | Private | 2B3P |
| 50 | Apartment Block C | Private | 2B4P |
| 51 | Apartment Block C | Private | 2B3P |
| 52 | Apartment Block C | Private | 1B2P |
| 53 | Apartment Block C | Private | 1B2P |
| 54 | Apartment Block C | Private | 3B5P |
| 55 | Apartment Block C | Private | 1B2P |
| 56 | Apartment Block C | Private | 1B2P |
| 57 | Apartment Block C | Private | 2B4P |
| 58 | Apartment Block C | Private | 2B3P |
| 59 | Apartment Block C | Private | 2B3P |
| 60 | Apartment Block C | Private | 2B4P |
| 61 | Apartment Block C | Private | 2B3P |
| 62 | Apartment Block C | Private | 1B2P |
| 63 | Apartment Block C | Private | 1B2P |
| 64 | Apartment Block C | Private | 3B5P |
| 65 | Apartment Block C | Private | 2B4P |
| 66 | Apartment Block C | Private | 1B2P |
| 67 | Apartment Block C | Private | 3B5P |
| 68 | Apartment Block D | Private | 2B4P |
| 69 | Apartment Block D | Private | 2B4P |

|    |                   |         |      |
|----|-------------------|---------|------|
| 70 | Apartment Block D | Private | 2B4P |
| 71 | Apartment Block D | Private | 1B2P |
| 72 | Apartment Block D | Private | 1B2P |
| 73 | Apartment Block D | Private | 2B4P |
| 74 | Apartment Block D | Private | 2B4P |
| 75 | Apartment Block D | Private | 2B3P |
| 76 | Apartment Block D | Private | 2B4P |
| 77 | Apartment Block D | Private | 2B4P |
| 78 | Apartment Block D | Private | 1B2P |
| 79 | Apartment Block D | Private | 1B2P |
| 80 | Apartment Block D | Private | 2B4P |
| 81 | Apartment Block D | Private | 2B4P |
| 82 | Apartment Block D | Private | 2B4P |
| 83 | Apartment Block D | Private | 2B4P |
| 84 | Apartment Block D | Private | 2B4P |
| 85 | Apartment Block D | Private | 1B2P |
| 86 | Apartment Block D | Private | 1B2P |
| 87 | Apartment Block D | Private | 2B4P |
| 88 | Apartment Block D | Private | 2B4P |
| 89 | Apartment Block D | Private | 1B2P |
| 90 | Apartment Block D | Private | 1B2P |

- 4.4 The proposed access makes use of the existing access arrangement into the site and will maintain existing carriageway widths (approximately 7m at the site boundary and approximately 5m as the road continues into the site).
- 4.5 Parking provision is proposed in the form of 81 unallocated spaces, 15 allocated and 17 visitor spaces to give a total of 113 spaces for the 90 units.

- 4.6 The proposal incorporates and enhances the sites currently neglected natural features through a landscape-led design, including public open space and a riverside walk beside the Hermitage Stream. This creates an attractive focal point and sense of place at the site.
- 4.7 The development will remove a large quantity of hard standing on a site that can be used for open storage and offers little to the local area and replace it with an attractive landscaped housing development with a large area of greenery and open space.

## **5.0 STATEMENT OF COMMUNITY INVOLVEMENT**

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- 5.1 Prior to the submission of this application, Bellway Homes Limited presented draft proposals at HBC's Development Consultation Forum (DCF) on 23<sup>rd</sup> August 2022.
- 5.2 The proposal has taken on board the helpful feedback received, both through the DCF and from the pre-application advice received.
- 5.3 A schedule setting out the pre-application advice and DCF feedback received and how the proposals have addressed the comments raised can be found at Appendix A.
- 5.4 The DCF was attended by around 30 people including a mixture of Councillors, Council officers, public, and the development team. Display boards were shown before the meeting started so people could ask questions and get a better understanding of the scheme and ask the members of the development team questions directly.
- 5.5 The DCF itself then involved a presentation from Council officers of the planning history and policies, followed by the development team explaining the proposals, and other speakers then commented on the proposals.
- 5.6 Councillors were then able to ask questions and suggest points that could be addressed in more detail should a planning application be forthcoming. This was a useful process and has informed the final proposals.

## 6.0 KEY PLANNING CONSIDERATIONS

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### **Principle of Development**

#### Urban Areas

- 6.1 The site is within the Urban Area/Settlement Boundary under policies CS17 of the Core Strategy Local Plan and AL2<sup>1</sup> of the Allocations Local Plan, where development is to be concentrated. 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;
  - Prioritises development on previously developed land, including redundant, derelict or underused land and buildings within the Urban Area; and
  - Broadly distributes new housing in the five areas of the borough as indicated on the spatial distribution map (including Havant).
- 6.2 The proposed development is in accordance with the above criteria, meaning the principle of residential development at this site is acceptable.

#### Site Allocation

- 6.3 The northern part of the site is allocated for residential development within the Site Allocations Plan under Policy HB1 – site H19 with a yield of 21 dwellings.
- 6.4 The site was also identified in the emerging Local Plan under Policy H24 with a yield of 15 dwellings, however this emerging Local Plan was withdrawn by the Council on 16<sup>th</sup> March 2022 following the Inspector's recommendations. Like many of the allocated sites in HBC's Development Plan, which included areas within Flood Zones 2 and 3, it was however concluded that the site could be safely developed, subject to a site-specific FRA being provided at the planning application stage.
- 6.5 The allocation therefore confirms that HBC consider the principle of developing the northern part of the site acceptable.

#### Housing Land Supply Position

- 6.7 HBC has a housing land supply shortfall in that it is 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 equates to a shortfall of 764 homes in the Borough.

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<sup>1</sup> A list of all relevant policies can be found at Appendix B

- 6.8 Furthermore, HBC currently fail the Housing Delivery test, having delivered, in the last three years, only 74% of their housing requirement<sup>2</sup>.
- 6.9 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.
- 6.10 Moreover, following the withdrawal of the emerging Local Plan in March 2022, HBC have started on the preparation of a new Local Plan. A Regulation 18 consultation took place from 3 October to 14 November 2022. The Local Development Scheme (September 2022) sets out the plan production timetable, with examination anticipated by quarter 2 of 2024 and adoption not expected until quarters 1-2 of 2025. It is therefore at a very early stage hence no weight is given to this emerging plan, emphasising the need for housing delivery now.
- 6.11 In addition, there is an acute affordable housing need in the Borough and the demand remains consistently high. As of 25<sup>th</sup> October 2021, there were 1732 active applications registered on Hampshire Home Choice seeking accommodation in the Borough and of these, 811 are waiting for a one-bedroom home, 544 for a two bed, 307 for a 3 bed and 70 for a 4+ bedroom home. Waiting times on Hampshire Home Choice represent a significant number of years – between April 2020 to March 2021, for Band 3 applicants (which represents a reasonable priority for moving) the time between registration and nomination was an average of between 2 to 5 years depending on the property size required<sup>3</sup>. In terms of affordable housing delivery, just 205 were completed during the 2021-2022 monitoring year.
- 6.12 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. Affordable housing provision is also a substantial benefit of the proposed development, particularly given it is a brownfield site. 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.
- 6.13 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:

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<sup>2</sup> Housing Delivery Test: 2021 measurement

<sup>3</sup> As referred to in the Committee report for application APP/20/00658

- 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
- 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.

6.14 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 these designations and in terms of flood risk, the majority of the site is in flood zone 1, with a small part of the site at the south within flood zones 2 and 3. It is also in an area that has just a 'low' risk of surface water flooding. Therefore, the proposal does not impact upon such assets.

6.15 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 there are no adverse impacts that would significantly and demonstrably outweigh the benefits of the proposed development.

#### Housing Delivery Position Statement

6.16 HBC have prepared a 'Housing Delivery Position Statement' (HDPS), 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.

6.17 The HDPS also identifies the northern part of the site's allocation for the delivery of 15 dwellings (which makes clear is a minimum density). Given the northern part of the site is allocated for residential development and the southern part of the site is within the Urban Area/Settlement Boundary, residential development of the site is in accordance with the Development Plan.

6.18 Within the HDPS 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

- 6.19 Decision making principles 3, 4 and 6 do not apply in this case.
- 6.20 Decision making principle 1 explains that the Development Plan forms the starting point for the determination of planning applications and appeals. It goes on to explain that in line with paragraph 11 d) of the NPPF, the contribution that development proposals would make to housing supply will be given substantial weight. As such planning permission will be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole. The principle also states housing proposals will be expected to be subject to detailed pre-application discussions, including public consultation undertaken by the developer prior to the submission of any formal planning application.
- 6.21 The proposed development accords with decision making principle 1 in that both pre-application discussions and public consultation were undertaken prior to submission, as explained in this statement. In addition, the proposal accords with the Development Plan, which is demonstrated throughout this statement, and the scheme will make a positive and substantial contribution to HBC's housing supply.
- 6.22 Decision making principle 2 states that the principle of residential development in Table 1 sites (including Land at Palk Road) will be supported in order to significantly boost housing supply in the Borough. Proposals coming forward on sites in Table 1 will be required to meet remaining requirements of the Development Plan; and expected to comply with the decision-making principles set out in the HDPS.
- 6.23 The proposed development meets the requirements of the Development Plan, which is demonstrated throughout this statement, and the HDPS as set out in this section.
- 6.24 Decision making principle 5 states residential development will be expected to accord with the following (we have responded to each criterion below):

- 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;

The proposed development will provide the required infrastructure needed, which will be negotiated during the determination of the planning application and secured by S106 agreement. The anticipated Heads of Terms are set out in section 8.

- 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;

This Planning Statement and the accompanying Design and Access Statement has demonstrated that the proposal is of a high-quality standard and accords with the National Design Guide.

- 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;

The proposed development exceeds this minimum and is 113 dwellings per hectare (dph), which is suitable for the site and its location and is less than adjoining development, for example Bellinger House is 135 dph.

- 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;

The proposal includes a network of footpaths that link with the existing network. This can be seen in the Surface Material Layout Plan prepared by A2 and the Landscape Masterplan prepared by ACD Environmental. In addition, the accompanying Transport Assessment sets out a range of pedestrian and cycle improvements that are either proposed or that the development would provide contribution towards if deemed necessary.

- 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

The proposal will generate a significant biodiversity net gain – 108.5% for habitat units and 100% for hedgerow units, which is a significant benefit of the scheme and well in excess of 10% net gain. Given this significant excess, there is potential for credits to be traded with other developments. If the proposal development delivered a 10% net gain, there would be circa 3 biodiversity habitat units available to trade.

In addition, the scheme proposes a range of ecological enhancement measures and incorporates and enhances the sites natural features. More information on this is set out within the ecology section below and in the Ecological Impact Assessment.

- f) Provide electric vehicle charging infrastructure for each new residential unit with private off-street parking;

The proposal includes the provision of electric vehicle charging infrastructure for each dwelling.

- g) Meet the nationally described space standards for new homes provided;

The proposal meets the nationally described space standards.

- h) Provide outdoor private and/or communal amenity space for all residential units;

Private amenity space in the form of balconies are proposed. In addition, a significant amount of public open space is proposed, totaling 0.3ha, creating an attractive area for the enjoyment of future residents and the existing local community.

A riverside walk beside the Hermitage stream has been incorporated into the scheme, as well as an informal area of play comprising sensory shrub, herbaceous and meadow planting with natural materials integrated such as logs and boulders and a natural play mound beside a picnic area, which form low key play features. This acts as a focal point and creates a sense of place for future residents. Such provision is in excess of policy requirements, which is explained further at criterion p.

- i) Achieve a reduction in CO<sub>2</sub> 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;

The development will achieve a reduction in CO<sub>2</sub> emissions of at least 31% compared with the current building regulations standards (Part L 2013).

- j) Provide a drainage strategy suitable to the site which incorporates appropriate Sustainable Drainage Systems (SuDS) to an adoptable standard;

The accompanying Flood Risk Assessment and Drainage Strategy sets out the proposed drainage measures, which incorporates SuDS features. The Strategy is suitable to protect the site and surrounding areas from surface water flooding for all events up to and including the 1 in 100-year storm event including a 45% allowance for climate change. Therefore, the site would not be at risk of flooding or increase the flood risk to others.

- k) Provide for the sustainable management and maintenance of any new 'common parts' through a legal agreement

This will be secured through the S106 where necessary.

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);

The proposal comprises 30% affordable housing and is therefore policy compliant.

- m) Deliver 30% of homes designed to meet Part M4(2) of the Building Regulations;

All of the ground floor apartments themselves have been designed to M4(2) standards.

- 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.

48 2-bedroom homes are proposed in total, which equates to 53% of the overall mix. The proposed dwelling range includes a mix of 1-3 bed apartments, with the largest designed to accommodate 6 people .

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

Such a contribution can be negotiated during the determination of the planning application and secured by S106 agreement as deemed necessary.

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;

Using HBC's Occupancy Calculator, the proposed development generates an average occupation of 1.83 and therefore a population of 164.7. The open space requirement is therefore 0.25ha. The scheme is providing 0.3ha and therefore exceeds policy requirements. In addition, although the scheme generates an open space requirement of less than 0.5ha, an element of play is proposed, which is an additional benefit beyond policy requirement.

- 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)

5 (18.5%) of the affordable apartments will be M4(3) compliant, in excess of the requirement.

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

Although the proposed development does not comprise of 100 dwellings or more and therefore this criterion is not a requirement, it is proposed to include a bespoke Employment and Skills Plan within the S106 agreement. The precise nature and contents will be negotiated during the determination of the planning application.

### **Flood Risk and Drainage**

- 6.25 This application is supported by a Flood Risk Assessment and Drainage Strategy. This confirms that the majority of the site is in flood zone 1, with a small part of the site at the south within flood zones 2 and 3, as shown in the plan at paragraph 2.6.
- 6.26 The Environment Agency's surface water flood maps show that the development site is in an area that has a 'low' risk of surface water flooding and no other means of flooding identified as posing a risk to the site.
- 6.27 The proposed scheme has been designed to ensure that all residential development is located outside of the 100 years plus 37% allowance for climate change flood outlines, which have been agreed with the Environment Agency through pre-application consultation.
- 6.28 The surface water drainage strategy comprises discharging surface water runoff into the existing public sewer within the site boundary which almost immediately discharges to the Hermitage Stream running along the southern boundary of the site. Surface water will be attenuated within SuDS features prior to being discharged to the Hermitage Stream at a controlled rate equivalent to the greenfield runoff rates for the developable area of the site. This results in a minimum 92% betterment from the existing scenario.
- 6.29 The foul water drainage strategy is proposed to discharge into the existing Southern Water foul sewer that exists to the north of the site.
- 6.30 The Flood Risk Assessment and Drainage Strategy confirms that the drainage strategy is suitable to protect the site and surrounding areas from surface water flooding for all events up to and including the

1 in 100-year storm event including a 45% allowance for climate change. Therefore, the site would not be at risk of flooding or increase the flood risk to others.

- 6.31 A sequential test has already been carried out through the Local Plan, through the allocation of the northern part of the site under Policy H19 of the adopted Site Allocations DPD and the use of Palk Road to access that allocation. In addition, even though the emerging Local Plan was withdrawn, the sequential test was also addressed through the continued allocation under draft Policy H24 of the more recent Havant Borough Local Plan in 2021.
- 6.32 Therefore, as per NPPF paragraph 166, which states: *“Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again”*, it is not necessary to apply it again. Instead, an exception test has been submitted within the Flood Risk Assessment and Drainage Strategy which demonstrates that this site provides sustainable benefits and can be developed safely without increased flood risk elsewhere, reducing the flood risk overall and providing wider sustainability benefits to the community, in accordance with NPPF paragraph 164. The sustainability benefits are also highlighted throughout this planning statement.

### Highways

- 6.33 The location of the site presents an excellent opportunity to encourage sustainable travel, as part of a sustainable development.
- 6.34 A Transport Assessment has been submitted in support of this application. Within this, detailed consideration has been given to highways matters, including the following:
- Parking provision – consideration has been given to HBC’s Parking SPD and a suitable, justified parking scheme has been devised;
  - Visibility at the Palk Road/West Street junction - to accord with the 30mph speed limit;
  - Pedestrian improvements in the local area – such as tactile paving at the Palk Road/West Street junction and supporting the introduction of a crossing point between West Street and Meyrick Road. As similar findings have been presented in another scheme<sup>4</sup>, it is suggested that proportionate monetary contributions are made towards these improvements;
  - Trip generation associated with the development - the results conclude that the proposal could generate 21 two-way vehicle movements in the AM peak and 23 two-way movements in the PM peak, with 198 daily vehicle trips over a 12-hour period. As these trips are minimal, it is unlikely they will have a significant impact on the surrounding highway network;

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<sup>4</sup> Live planning application at Land at Kingscroft Farm, ref. 22/00669

- Capacity of the access to accommodate the proposed development – modelling has been undertaken for the Palk Road/West Street junction for all scenarios, including when the level crossing barrier is in operation. All modelling suggests there are no concerns with the capacity or operation of the junction.

- 6.35 Overall, the Transport Assessment demonstrates that the proposed development would not have a severe impact on the operation or safety of the local road network, has the opportunity to create a sustainable development and will enhance the local area with appropriate contributions to improvements.
- 6.36 A Travel Plan is also submitted in support of this application which sets out a range of measures to encourage residents to use alternative modes of transport to single occupancy vehicle journeys. It is proposed that the Travel Plan would be secured through a S106 agreement to ensure effective implementation and monitoring.
- 6.37 The proposal is therefore in accordance with policy CS20, which requires development to not increased congestion, promote better use of existing transport networks and ensure the safe and efficient operation of the strategic and local road network.
- 6.38 It is also in accordance with policy DM11, which seeks to ensure that every opportunity is taken to increase integration of sustainable transport modes and availability of non-motorised modes by appropriate measures, and policy DM12, which requires developments to mitigate their travel impact, including the environmental impacts of travel and impacts on amenity, health and climate change.

### **Ecology**

- 6.39 The site is a brownfield site which is dominated by hard standing, smaller areas of semi-improved grassland, scrub and ruderal vegetation and is of negligible ecological value.
- 6.40 The adjacent Hermitage Stream is classified as being in 'poor' condition due to extensive hard engineering, riparian encroachment and lack of natural features.
- 6.41 This application is supported by an Ecological Impact Assessment and Biodiversity Metric which states that the site does not support any significant populations of key species, however precautionary advice is provided in relation to bats, nesting birds, badgers, hedgehogs and reptiles.
- 6.42 The scheme proposes a range of ecological enhancement measures, including meadow grassland, native trees, species-rich hedgerow and wildlife friendly shrubs, as well as generating net gains in bat roosting and bird nesting habitat.
- 6.43 The right-hand bank of the Hermitage Stream's riparian zone will be re-landscaped from hard standing into public open space and a green corridor which will be a meaningful improvement to the existing situation.

- 6.44 The submitted Biodiversity Metric demonstrates that the proposal offers potential to generate significant levels of biodiversity net gain – 108.5% for habitat units and 100% for hedgerow units, which is well in excess of 10% and a significant benefit of the scheme that carries substantial weight in the planning balance. Given this significant excess, there is potential for credits to be traded with other developments. If the proposal development delivered a 10% net gain, there would be circa 3 biodiversity habitat units available to trade.
- 6.45 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.

#### **Nutrient Neutrality**

- 6.46 The site is within the Nutrient Neutrality SSSI Catchment established by Natural England. It is also within the wastewater catchment of the Budds Farm Wastewater Treatment Works which discharges treated effluent into designated European Sites within the Solent area and has been identified by HBC and Natural England as likely to lead to a significant effect on these sites.
- 6.47 A Nutrient Budget and Mitigation Statement has therefore been submitted with this application. This sets out the total annual nitrogen load that the proposal will be required to mitigate.
- 6.48 A solution is currently being explored, but it is anticipated that the Meon Springs (Whitewool Stream Wetlands) scheme will be used as off-site mitigation to ensure the proposal results in nutrient neutrality. This will be confirmed in due course and a suitable mechanism incorporated into a S106 agreement.

#### **Landscape and Trees**

- 6.49 A Tree Survey and Arboricultural Impact Assessment (AIA) has been submitted with this application. This confirms that three individual trees and two tree groups are proposed for removal, all of which are of a low quality – category C. These are shown on the Tree Protection Plan.
- 6.50 The majority of trees are proposed to be retained and protection measures for these trees is set out within the AIA. As part of the proposed landscaping a generous amount of new tree planting is proposed throughout the site, including a tree line running through the main car parking area at the centre of the site and dispersed around the area of public open space to the south.
- 6.51 The submitted Landscape Masterplan illustrates the landscape-led design of the scheme, which incorporates and enhances the sites currently neglected natural features.
- 6.52 A significant amount of public open space is proposed (0.3ha) in excess of the policy requirement, with a riverside walk beside the Hermitage Stream, creating a focal point and sense of place for future residents.
- 6.53 An informal play area is also proposed, comprising of sensory shrub, herbaceous and meadow planting with natural materials integrated such as logs and boulders and a natural play mound beside a picnic

area, which form low key play features and creates an attractive area for the enjoyment of future residents and the existing local community.

- 6.54 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. The development will result in a substantial enhancement to this part of Bedhampton.

### **Design**

- 6.55 The proposed development has been informed by and has responded to the opportunities and constraints of the site, with constraints including:
- Height restrictions and density of new development to respect the character and appearance of existing surroundings;
  - Existing and proposed services and associated easements;
  - Noise implications of the railway running along the northern boundary; and
  - Hermitage Stream to the south and its associated flood risk at the southern area of the site;
- 6.56 Opportunities include:
- Ability to remove the existing noise-generating and unneighbourly use on a brownfield site for existing residents in Palk Road;
  - Potential to establish a relationship with the Hermitage Stream to create an attractive focal point; and
  - Sustainable location to fulfill the housing needs of the local area, including much-needed affordable housing.
- 6.57 The character and form of the proposal is responsive to its surroundings by ensuring it is locally distinctive, deriving local styles such as box frame windows and brick detailing, as well as utilising high quality building materials and elevational treatments such as red multi and buff multi brick, black cladding and brown profiled tiles.
- 6.58 The proposed layout comprises four apartment blocks of varying heights up to four storeys, in a perimeter block formation. The southern two blocks are orientated to provide an enhanced setting and natural surveillance across the riverside parkland towards the Hermitage Stream.
- 6.59 The apartments are at least 16m away from the railway line. The closest part of the development to the existing chalet bungalow to the east (apartment A) is 12m away. The submitted Noise Assessment has reviewed the proposed development and confirms that noise levels within the dwellings should meet internal noise level criteria and therefore noise does not pose a constraint to the proposed development.

- 6.60 Open communal spaces have been well integrated to ensure social interaction and healthy living. A landscape buffer has been included around the site edges to soften the boundaries and reduce noise pollution.
- 6.61 Overall, it is a design-led and landscape-led scheme which is considerate to the form, density and character of its surrounding context, which incorporates the use of high-quality materials and makes efficient use of the site.
- 6.62 The regeneration of this underused brownfield site will rejuvenate the area, providing modern, much needed homes within a desirable location for people to live.
- 6.63 Further information on the design of the scheme is set out in the accompanying Design and Access Statement. Additional information on the sustainable design and construction of the scheme is set out in Appendix C.
- 6.64 Policy CS16 states that planning permission will be granted for development that is designed to a high standard, which helps to create places where people want to live, work and relax. It also states all development should demonstrate that its design responds to, draws inspiration from and respects local context; produces a positive relationship between buildings, street and spaces; contributes to the improvement of the public realm; is inclusive by considering the needs of those with disabilities; mitigates negative environmental impacts through sustainable design and adapts to the changing needs of the users and the changing climate over the lifespan of the building(s).
- 6.65 The proposed development has had careful consideration to and accords with the policy requirements to ensure a high-quality design.

### Noise

- 6.66 The submitted Noise Assessment notes that subject to the mitigation measures considered in the Assessment are implemented, noise levels within the proposed properties should meet the internal noise level criteria specified in the ProPG: Planning and Noise. Such mitigation measures include specific window glazing requirements.
- 6.67 Therefore, it can be concluded that noise does not pose a constraint to the proposed development. This accords with policy DM17 which states that planning permission will be granted provided that projected levels of noise pollution do not have significant negative effects on the amenity of future occupiers or users of the proposed development. The proposal also accords with policy DM10, which states that development that may cause pollution through noise 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.

### **Archaeology and Heritage**

- 6.68 An Archaeology and Heritage Assessment has been submitted in support of the application. This explains that the site is assessed to have low archaeological potential and that no designated heritage assets lie within or close to the site.
- 6.69 Old Bedhampton Conservation Area is over 100m north-west and west of the site and Brockhampton Conservation Area is approximately 200m to the east. Both areas contain listed structures but the closest to the site are more than 100 metres from it and most are several hundred metres distant.
- 6.70 It is confirmed in the Assessment that redevelopment of the site would not harm the significance of any heritage asset, nor an appreciation of that significance.
- 6.71 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.

## 7.0 AFFORDABLE AND MARKET HOUSING STATEMENT

### Affordable Housing

- 7.1 The proposal will include 27 affordable homes, which makes up 30% of the total homes proposed. This is in accordance with the Housing Delivery Position Statement. The proposal will also include a suitable mix of apartment sizes to cater to local needs. Of this 27, 19 are for affordable rent and 8 for shared ownership. 5 of the units are designed to be wheelchair accessible
- 7.2 The Affordable Housing Plan<sup>5</sup> shows the breakdown and positioning in more detail. The location of the affordable housing across apartments A and B is justified to enable management by a Registered Provider and to ensure the value of market units is maximised such that the scheme is able to provide a policy compliant level of affordable housing.
- 7.3 The proposed schedule of accommodation is set out below.

| Affordable |           |                   |
|------------|-----------|-------------------|
| Bedrooms   | Reference | Quantity          |
| 1          | 1B2P      | 12 (44%) 3x M4(3) |
| 2          | 2B3P      | 2 (7%) 1x M4(3)   |
| 2          | 2B4P      | 10 (37%)          |
| 3          | 3B5P      | 1 (4%)            |
| 4          | 3B6P      | 2 (7%) 1x M4(3)   |
| Total      |           | <b>27</b>         |

### Market Housing

- 7.2 63 market homes are proposed which comprise of a mix of sizes helping to meet local needs that will contribute to the development of mixed and sustainable communities, in accordance with Policy CS9.
- 7.3 The delivery of market housing alongside policy compliant levels of affordable housing will result in a substantial boost to local housing delivery. This is a significant public benefit of the scheme that carries substantial weight in the planning balance, particularly given HBC's lack of a 5YHLS.
- 7.4 The proposed schedule of accommodation is set out below. All 90 of the apartments are in accordance with the Nationally Described Space Standards (NDSS).

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<sup>5</sup> Appendix D

| Private  |           |           |
|----------|-----------|-----------|
| Bedrooms | Reference | Quantity  |
| 1        | 1B2P      | 22 (35%)  |
| 2        | 2B3P      | 8 (13%)   |
| 2        | 2B4P      | 28 (44%)  |
| 3        | 3B5P      | 5 (8%)    |
| Total    |           | <b>63</b> |

## 8.0 S106 HEADS OF TERMS

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- 8.1 Bellway Homes Limited propose to enter into a legal agreement through S106 of the Town and Country Planning Act 1990 (as amended) to secure any necessary planning obligations.
- 8.2 The precise nature of the planning obligations to be provided will be negotiated during the course of the planning application but it is anticipated that the S106 agreement will secure the following:
- Provision of Affordable Housing
  - Nutrient Neutrality
  - Provision and Management of Open Space and Communal Areas
  - Site Specific Infrastructure/Highways Works/Management
  - Implementation and Monitoring of the Travel Plan
  - Employment and Skills Plan
  - Avoiding Recreational Impacts on Chichester and Langstone Harbours Special Protection Area (SPA) through the Solent Recreation Mitigation Strategy
- 8.3 This will ensure the infrastructure is provided in support of the proposed development and ensure compliance with Policy CS21: Developer Requirements of the adopted Core Strategy and Havant Borough Council Developer Contributions Guide.

## 9.0 SUMMARY AND CONCLUSION

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9.1 Tetra Tech have prepared this Planning Statement in support of the submission of a full planning application on behalf of the applicant, Bellway Homes Limited.

9.2 The proposed development comprises:

*“Full planning application for the redevelopment of a brownfield site to include the provision of 90 residential dwellings (including 27 affordable units) (C3 use), parking, public open space, landscaping and other associated works, including demolition of existing buildings on site, with access from Palk Road”.*

9.3 The proposal overall accords with HBC’s Development Plan and the objectives of the NPPF. This Statement has highlighted the significant benefits the proposal would offer, which are summarised below. It is an extremely sustainable scheme which makes efficient use of a currently underused brownfield site and integrates well with the local area.

### Planning Balance

9.4 The proposed development would have a positive impact socially, environmentally and economically, in accordance with the objectives of the NPPF. 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, environmental and economic objectives<sup>6</sup>.

9.5 The proposal would result in **social benefits** through:

- The provision of 90 homes to add to the much-needed housing stock of the Borough, in a highly sustainable and desirable location;
- Policy compliant 30% affordable housing provision (comprising 19 for affordable rent and 8 for shared ownership);
- Suitable mix of apartment sizes to cater to local needs, including 48 2-bed apartments;
- 5 units are designed to be wheelchair accessible;
- Owing to its highly sustainable location, future residents will have excellent access to a wide range of services, facilities and employment opportunities;
- Generous amount of attractive public open space and play provision for the enjoyment of future residents and the existing local community;

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<sup>6</sup> NPPF paragraph 8

- Removal of a noise-generating, unsightly and unneighbourly use and replacing it with 90 high-quality homes which is in-keeping with its surroundings.

9.6 The proposal would result in **environmental benefits** through:

- Making an efficient use of an underused, brownfield site, in line with the NPPF objectives of making as much use as possible of such sites and the government's 'brownfield first strategy';
- A landscape-led scheme which has been carefully designed to a high-quality, ensuring it is harmonious with the local area;
- Retention where possible of existing trees and planting and provision of new planting;
- Provision of a range of ecological enhancement measures and a significant net gain in biodiversity;

9.7 The proposal would result in **economic benefits** through:

- A substantial injection of expenditure to the local economy in the short term during the construction phase, including employment related to the construction of the proposal;
- Longer term benefits resulting from increased support for local shops and services;
- Good access to employment opportunities due to the site's centrally located and sustainable position;
- Financial contribution towards local infrastructure via Community Infrastructure Levy (CIL) and S106 contributions.

9.8 It is therefore evident that the proposed development would bring about multiple benefits, in particular a high-quality development with attractive features for future residents and much needed market and affordable housing provision. The proposal makes efficient use of previously developed land to meet the housing needs of the Borough.

9.9 It has been demonstrated in this Statement that the principle of development is acceptable, and the proposal accords with the Development Plan and the overarching objectives of the NPPF.

9.10 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".

9.11 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.

9.12 It is therefore respectfully requested that this application is approved without delay.

## APPENDICES

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### **Appendix A– Pre-application and DCF Schedule**

## Appendix B: Pre-application and DCF Schedule

| HBC Pre-application comments (29/04/2022)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Response/How comments have been addressed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Principle of Development and Flood Risk</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <ul style="list-style-type: none"> <li>• Acknowledged that part of the site (north) is allocated for residential development under Policy HB1.</li> <li>• Although the remainder of the site to the south is not specifically allocated, it does fall within the Urban Area / Settlement Boundary.</li> <li>• Agree that the principle of sustainable development within the northern section of the site is acceptable.</li> <li>• In terms of the southern part of the site, regard must be had to the flood risk. Only the very southern extent of the site is within FZ2&amp;3, however consideration must be given to the lifetime of the proposed development and when climate change allowance is taken into account flooding poses a significant risk across much of the site including access from Palk Road.</li> <li>• A sequential test and exception test will be required.</li> <li>• A Flood Risk Assessment should also accompany the planning application.</li> <li>• Acknowledge the absence of a five year housing land supply however the principle of development at the wider site would only be acceptable subject to demonstration that there are no other reasonably available sites at a lower risk of flooding, that the development would provide wider sustainable benefits to the</li> </ul> | <ul style="list-style-type: none"> <li>• The proposed scheme has been designed so that all residential development is outside of the 100 year plus 37% allowance for climate change flood outlines, which have been agreed with the Environment Agency through pre-application consultation.</li> <li>• The planning statement at paragraph 6.29 explains that a sequential test has already been carried out through the Local Plan through the allocation under Policy HB1. Therefore as explained in NPPF paragraph 166, it is not necessary to apply it again. Instead, an exception test has been submitted within the Flood Risk Assessment.</li> <li>• The submitted Flood Risk Assessment forms the exception test and demonstrates the sustainable benefits and that the development would be safe for its lifetime without increasing flood risk elsewhere, therefore passing the test.</li> </ul> |

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|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| community that outweigh remaining flood risks, and that the development would be safe for its lifetime without increasing flood risk elsewhere.                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Highways</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <ul style="list-style-type: none"> <li>• The impact of the development on the wider highway network and junctions would need to be fully considered through a Transport Assessment having particular regard to the junction with West Street and the railway crossing.</li> <li>• Planning application should clarify that the site is able to accommodate emergency and refuse vehicles.</li> <li>• Parking provision should be in accordance with HBC's Parking SPD.</li> <li>• A proportion of the parking spaces should be supported by EV charging facilities.</li> </ul> | <ul style="list-style-type: none"> <li>• A Transport Assessment, Travel Plan and WCHAR is submitted with this application.</li> <li>• The Transport Assessment demonstrates that the proposed development would not have a severe impact on the operation or safety of the local road network, has the opportunity to create a sustainable development and will enhance the local area with appropriate contributions to improvements.</li> <li>• Modelling has been undertaken for the Palk Road/West Street junction for all scenarios, including when the level crossing barrier is in operation. The modelling suggests there are no concerns with the capacity or operation of the junction.</li> <li>• The Transport Assessment confirms that given the site currently provide access for large vehicles, it should be capable of accommodating emergency and refuse vehicles.</li> <li>• Consideration has been given to HBC's Parking Standards SPD and a suitable, justified parking scheme has been devised. More information on this is set out within the Transport Assessment.</li> <li>• The proposal includes the provision of electric vehicle charging infrastructure for each dwelling.</li> </ul> |
| <b>Design, Layout and Character</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <ul style="list-style-type: none"> <li>• Given the specific site constraints, notably the noise and vibration associated with the railway line and flood risk, the benefits of providing dwellings in close proximity to a railway station and the wider benefits of providing an enhanced open landscape setting for the Hermitage Stream, it is considered that a case for an entirely flatted development could potentially be made in this instance.</li> </ul>                                                                                                            | <ul style="list-style-type: none"> <li>• As suggested by HBC, an entirely flatted scheme is proposed.</li> <li>• A better relationship between the existing bungalow and the proposed development is now proposed, with development now stepping away from the bungalow, graduating from a 2-storey</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• The relationship of the northern blocks with the chalet bungalow to the east must be very carefully considered and addressed. In its current form the relationship is poor with the larger block overwhelming the bungalow both in visual streetscene and amenity terms.</li> <li>• The orientation of the southern blocks miss opportunities to provide an appropriate setting to the Hermitage Stream open spaces or provide adequate natural surveillance which will be important. Whilst the flooding constraints are acknowledged, consideration must be given to the re-orientation of these blocks and their contribution to place making in respect of the public open space.</li> <li>• The submitted street scenes assume a flat site and it is unclear how changes in finished floor levels will affect both external appearance and the scale/heights of the buildings. Sections through the site showing ground levels relative to finished floor levels will need to be provided from the outset to ensure a clear understanding of visual appearance and residential amenity.</li> <li>• Car parking dominates large parts of the site to the south.</li> </ul> | <p>building and then rising to a 3-storey building further from the bungalow.</p> <ul style="list-style-type: none"> <li>• The south-western block has been re-orientated to provide an enhanced setting and natural surveillance across the riverside parkland towards the Hermitage Stream.</li> <li>• Illustrative streetscenes and a site section have been submitted to demonstrate the relationship with existing development on Palk Road. The streetscenes are based on finished floor levels established through the FRA and drainage strategy and supporting levels drawing prepared by Ardent Consulting.</li> <li>• With the re-orientation of the south-western block has also come a rearrangement of the parking courts at the south of the site, with the row of parking running to the south of the southern-most blocks removed and re-provided in-between the two southern blocks, creating a softer transition to the riverside parkland and Hermitage Stream.</li> </ul> |
| <b>Trees and Ecology</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <ul style="list-style-type: none"> <li>• Planning application will need to be supported by a full Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan.</li> <li>• Further work in relation to reptile species and bat roosting potential is requested.</li> <li>• A detailed ecological mitigation, compensation and enhancement plan should be submitted with a planning application.</li> <li>• Any residential development at the site will be required to mitigate the increased population and potential impacts on the SPAs as a result of increased recreational disturbance.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <ul style="list-style-type: none"> <li>• An Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan have been submitted in support of this application.</li> <li>• An Ecological Impact Assessment has been submitted in support of this application which addresses the pre-application comments raised and also comprises the ecological mitigation, compensation and enhancement plan.</li> <li>• It is anticipated that a S106 agreement will be secured to ensure (amongst other things) compliance with the Solent Recreation Mitigation Strategy.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                        |

| Heritage                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>Planning application will need to be supported by a Heritage Statement that addresses the below ground archaeological potential of the site, the impact of past development on the survival (or loss) of that archaeological potential, the impact of the proposed development, and a suggested mitigation strategy (if any) to satisfy the planning authority that archaeological matters have been considered in line with guidance on NPPF.</li> </ul> | <ul style="list-style-type: none"> <li>An Archaeology and Heritage Assessment has been submitted with this application which concludes that the site has low archaeological potential, no designated heritage assets lie within or close to the site and that the redevelopment of the site would not harm the significance of any heritage asset, nor an appreciation of that significance.</li> </ul> |
| Housing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                         |
| <ul style="list-style-type: none"> <li>Policy CS9 sets out the requirements for housing within new developments, including 30-40% affordable housing provision and a mix of dwelling types and tenures.</li> </ul>                                                                                                                                                                                                                                                                               | <ul style="list-style-type: none"> <li>The proposed comprises 27 homes being provided as affordable (30%). This is compliant with the Housing Delivery Position Statement. The proposal also includes a mix of apartment sizes to cater to local needs. Further details are set out within section 7 of the planning statement.</li> </ul>                                                              |
| Noise                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                         |
| <ul style="list-style-type: none"> <li>There is a need for Noise Risk and Vibration Assessments to be submitted with a planning application.</li> </ul>                                                                                                                                                                                                                                                                                                                                          | <ul style="list-style-type: none"> <li>A Noise Assessment has been submitted which notes that subject to the mitigation measures considered in the Assessment are implemented, noise levels within the dwellings should meet internal noise level criteria. Therefore it can be concluded that noise does not pose a constraint to the proposed development.</li> </ul>                                 |
| Nutrient Neutrality                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                         |
| <ul style="list-style-type: none"> <li>The development will need to demonstrate nutrient neutrality</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                   | <ul style="list-style-type: none"> <li>A solution is currently being explored, but it is anticipated that the Meon Springs (Whitewool Stream Wetlands) scheme will be used as off-site mitigation to ensure the proposal results in nutrient neutrality. This will be confirmed in due course and a suitable mechanism incorporated into a S106 agreement.</li> </ul>                                   |

| DCF Key Comments and Topics (23/08/2022)                                             | How comments have been addressed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|--------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Approach to sustainable design and construction. Reducing energy costs for residents | An Energy and Sustainability Statement is incorporated within this Planning Statement which explains how the proposal demonstrates a fabric first approach. It confirms the range of sustainable design considerations, including resource efficiency, waste reduction and water efficiency, both during and after construction.                                                                                                                                                                                                                                                                      |
| Location of affordable housing/pepperpotting                                         | <p>Affordable housing is proposed across apartment blocks A and B, with block A comprising affordable rent and some of block B comprising shared ownership.</p> <p>The affordable housing units are grouped together on the northern part of the site for ease of management by the Registered Provider but also to maximise the viability of the scheme such that a policy compliant level of affordable housing provision is more achievable, flattened schemes on previously developed sites more commonly being unable to support affordable housing provision, both in Havant and elsewhere.</p> |
| Private amenity space                                                                | Private amenity space in the form of balconies are proposed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Suitability of Palk Road                                                             | Palk Road is currently unregistered and is not therefore subject to any formal management and maintenance arrangements. The applicant is reviewing potential options to address this position, including incorporating the road into the management regime of the proposed development, thus securing its future maintenance and providing a betterment for existing residents.                                                                                                                                                                                                                       |
| Highways and parking                                                                 | All comments have been addressed in the submitted Transport Assessment and WCHAR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Distance between railway line and dwellings                                          | The apartments are at least 16m away from the railway line. The closest part of the development to the existing chalet bungalow to the east (apartment A) is 12m away. The submitted Noise Assessment has reviewed the proposed development and confirms that noise levels within the dwellings should meet internal noise level criteria and therefore noise does not pose a constraint to the proposed development.                                                                                                                                                                                 |

## **Appendix B - List of relevant policies**

## **Appendix B: List of Relevant Policies**

The relevant parts of the Havant Borough Council (HBC) Development Plan currently comprise:

- Local Plan (Core Strategy) adopted March 2011
- Local Plan (Allocations) adopted July 2014

### Local Plan (Core Strategy)

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.

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

- Policy CS1: Health and Wellbeing
- 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 DM9: Development in the Coastal Zone
- 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

### Local Plan (Allocations)

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 AL6: Havant Thicket Reservoir Pipeline
- Policy AL7: Hermitage Stream
- 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
- Policy HB1: Havant and Bedhampton Housing Allocations

### Emerging Plan

HBC commenced work on a new Local Plan which reached 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.

HBC are therefore preparing a new Local Plan. A Regulation 18 consultation took place from 3 October to 14 November 2022. The Local Development Scheme (September 2022) sets out the plan production timetable, with examination anticipated by quarter 2 of 2024 and adoption by quarters 1-2 of 2025. It is therefore at a very early stage hence no weight is given to this emerging plan.

### Supplementary Planning Documents (SPDs) and Other Guidance Documents

- 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)

## National Planning Policy Framework (July 2021)

The NPPF sets out the Government's planning policies for England and how these should be applied. It establishes a presumption in favour of sustainable development. The following paragraphs are considered most relevant to this application:

- Paragraph 8 - 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 - 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
- Paragraph 11 – 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

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.

- Paragraph 33 - 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.
- Paragraph 38 - 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.

- 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.
- Paragraph 74 – 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.
- Paragraph 76 – 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.
- Paragraph 111 – 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 119 – 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. It emphasises the importance of making as much use as possible of previously developed or brownfield land.
- 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).
- Paragraph 167 – 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.
- 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.

- Paragraph 180 – 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.

## **Appendix C – Sustainability and Energy Statement**

## **Appendix C: Sustainability and Energy Statement**

### Introduction

Adopted local plan policy makes reference to the need for new development to mitigate negative environmental impacts through sustainable design and construction methods, resource efficiencies, particularly water, along with the provision of facilities for waste recycling.

While not an adopted local plan requirement, Decision Making Principle 5 of the Council's "Housing Delivery Position Statement", published in March 2022 refers to the following standards being sought in relation to sustainable construction and energy considerations:

- f) provide electric vehicle charging infrastructure for each new residential unit with private off-street parking;
- 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.

### Sustainable Development

As set out within the Planning Statement, the principle of sustainable development relates to three key strands, social, environmental and economic.

The proposal is a highly sustainable form of development from an environmental perspective including with respect to:

- Making best use of a previously developed underused site, in line with the Government's 'brownfield first' strategy;
- Highly sustainable location within a short (3 minute) walk of Bedhampton Rail Station and within 12 minutes walk / 3 ½ minute cycle of Havant High Street;
- Provision of cycle parking in accordance with adopted standards, comprising 146 secure spaces within the apartment blocks and 29 cycle spaces for visitors in the form of hoops;
- Transforming 0.3 hectares of existing brownfield land comprising hardstanding to a new riverside parkland space with associated ecological enhancement measures, resulting in a significant net gain in biodiversity.

## Sustainable Construction

In addition to these overarching sustainability considerations, the development will be constructed to secure a reduction in carbon emissions, reduce energy usage and minimise energy loss (e.g. through enhanced building fabric).

Overall, the development will achieve equivalent to a 31% reduction in CO2 emissions compared with current regulatory standards set out in Part L 2013 of the Building Regulations, exceeding policy requirements and demonstrating a commitment to low carbon development which is more affordable for residents.

In accordance with the Energy Hierarchy (Be Lean – Reduce Energy Demand; Be Clean – Supply Energy Efficiently; Be Green – Use Renewable Energy) efforts will first focus on **reducing energy demand**. This will include application of a 'Fabric First' approach, enhancing the built form to improve U-values (to reduce heat loss through a given element e.g. walls, floors etc), reducing thermal bridging (heat loss through the junction where two elements meet), improving air tightness and installing energy efficient ventilation and heating services. This approach has been widely supported by industry and government for some time, with the Zero Carbon Trust and the Energy Savings Trust having both stressed the importance of prioritising energy demand as a key factor in delivering resilient, low energy buildings.

The benefits of the Fabric First approach compared to greater use of bolt on renewable energy technologies include:

- Energy / CO2 / fuel bill savings applied to all homes
- Savings built in for life of the homes
- Increased thermal comfort
- Minimal ongoing maintenance / replacement costs

**Low carbon and renewable energy systems** will however still be incorporated into the development to achieve the carbon reduction targets required by Building Regulations.

While originally anticipated that solar photovoltaics (PV) would be used, following further review of the design and feedback received at the Development Consultation Forum it is now envisaged that hot water heat pumps are likely to be utilised within each of the apartments, delivering levels of performance in excess of current requirements. Due to their changing nature, with new products coming to the market on an ongoing basis, the specific technologies that will be adopted to achieve the carbon reduction targets set out within Building Regulations will be determined at the detailed design stage (post planning) in accordance with standard practice.

## Water Efficiency

Water efficiency measures including the use of efficient dual flush WCs, low flow showers and taps and appropriate sized baths will limit the use of water associated with the development, each apartment

minimising water usage to no more than 110 litres/person/day, better than the minimum standard of 125 l/p/d set out within Building Regulations.

#### Electric Vehicle Charging (EVC)

It is recognised that there is a need to ensure that the development is adaptable to accommodate a future shift in personal transportation to electric vehicles, to promote sustainable transport and to minimise air pollution.

The development will include provision of EVC infrastructure for every apartment in accordance with criterion f) of the Havant Housing Delivery Position Statement.

#### Domestic Waste and Recycling

The storage and collection of refuse and recyclable waste has been considered as an integral part of the design process with provision made for communal storage in each of the apartment blocks, in accordance with local requirements.

## **Appendix D – Affordable Housing Plan**



| SITE PLAN LEGEND |                  |           |
|------------------|------------------|-----------|
| <div></div>      | Shared Ownership | ( x8 )    |
| <div></div>      | Affordable Rent  | ( x19 )   |
| Total = 27       |                  | ( 30% )   |
| <div></div>      | M4 (3)           | ( x5 )    |
| Total = 5        |                  | ( 18.5% ) |

2

ARCHITECTURE & DEVELOPMENT

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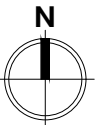
PROJECT:  
Land Off Palk Road,  
Bedhampton, Havant  
PO9 1NL

DRAWING:  
Affordable Housing Plan

STATUS:  
Planning

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