



PLANNING AND AFFORDABLE HOUSING STATEMENT

LAND OFF ST MARY'S ROAD
HAYLING ISLAND

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EXECUTIVE SUMMARY

- i. This planning statement supports an outline planning application made by Gladman for Land off St Mary's Road, Hayling Island. The development will comprise up to 300 dwellings (including 30% affordable housing), public open space, landscaping, a sustainable drainage system and a vehicular access point from St Mary's Road.
- ii. The application is made in outline, with all matters reserved except for access. The access details provide certainty that the site can be accessed acceptably and safely by vehicles, cyclists and pedestrians.
- iii. The application site is well located to the existing urban area and represents a suitable and sustainable location for housing.

Design Led Approach

- iv. The proposed development has been carefully considered to ensure that it will provide high quality sustainable development. The design-led approach, informed by consultation with the key stakeholders and the local community, responds sensitively to the site setting, respecting the grain of the surrounding landscape, both built and undeveloped.
- v. The Development Framework Plan that accompanies the application submission demonstrates how an appropriate development can be accommodated at the site which respects the site's existing landscape features and provides a sensitive edge to the adjoining countryside. New homes will be set within a framework of new and enhanced green infrastructure (comprising approximately 36% of the application site area), helping to assimilate new development into its setting and deliver benefits for the biodiversity and recreation.
- vi. Existing boundary vegetation will be retained and enhanced with new tree and hedgerow planting, whilst the creation of a new green corridor will connect the northern and central areas of on-site green space to the surrounding area. This central green corridor will also enhance the retained heritage views to St Mary's Church, as well as increasing biodiversity connections and habitat opportunities. The creation of an informal perimeter path will help to improve accessibility and connectivity with the adjoining Public Rights of Way network for future and existing residents, including the scope to create linkages with the adjoining emerging Local Plan allocation for Fathoms Reach (Policy H28).

Benefits Arising from Development at this Location

- vii. The proposal offers the opportunity to deliver:
 - Economic benefits, through investment in the local community, and the creation of jobs during the construction phase of the development;

- New areas of publically accessible open space, including a children's play area and facilities for teenagers;
- Improvements to biodiversity through on site mitigation strategies and other ecological enhancements, as detailed in the accompanying Ecological Impact Assessment;
- On site Sustainable Drainage System (SuDS) to improve the surface water flood risk on site;
- District wide benefits, in terms of making a strategically important contribution to the supply of market and affordable housing and supporting economic objectives;
- Enhanced accessibility and connectivity for future and existing residents via off-site highway improvements, informal on-site footpath routes and connections to the wider Public Rights of Way network

Accordance with the Development Plan

- viii. Planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- ix. In this respect, whilst the application proposals would be contrary to Havant Core Strategy and Allocations Plan Policies CS17 and AL2 in principle by virtue of their location outside of the defined urban area for Hayling Island, both of these policies were designed to meet housing requirements from a different era and are now failing to meet more recent, up-to-date evidence of Havant's full housing needs.
- x. It is furthermore the case the case that the Council are currently unable to demonstrate a five-year housing land supply, thereby rendering the most important policies for determining the application (including Havant Core Strategy and Allocations Plan Policies CS17 and AL2) out-of-date for the purposes of decision-making on this basis alone.
- xi. In the circumstances, the application proposals therefore fall to be determined in accordance with the tilted planning balance contained within paragraph 11d of the National Planning Policy Framework.
- xii. As will be demonstrated through this Planning and Affordable Housing Statement, there are material considerations and benefits of the proposed development that significantly outweigh the identified harm which would justify a departure from the conflict with the Development Plan in this instance.
- xiii. Importantly, the application proposals would also align with the development strategy for the borough contained in the emerging Havant Borough Local Plan, including the application site's status a proposed allocation under Policy H27 – Rook Farm.

Summary

- xiv. An assessment against the up to date provisions of the Development Plan and the Framework where relevant, demonstrates the scheme comprises sustainable development:
- The proposals will provide a range of benefits, including making a significant contribution towards meeting the objectively assessed market and affordable housing needs of the borough, in a situation where it cannot demonstrate a deliverable five-year housing land supply.
 - The harm identified arising from the development of a greenfield site beyond the current settlement boundaries, is limited in scale and magnitude; it is no more than would be expected for changing a previously undeveloped site to one of built form.
 - There are no policies of the Framework that indicate permission should be restricted.
- xv. In summary, the identified harms arising as a result of the development would not be considered sufficient, either in combination or by themselves, to outweigh the benefits of delivering housing as proposed.
- xvi. There are therefore significant material considerations which outweigh the statutory presumption in favour of the Havant Borough Development Plan which overall justifies the grant of permission for the development proposed.

1 INTRODUCTION

1.1 Scope of this Statement

1.1.1 This Planning Statement has been prepared in support of an outline planning application for the development of up to 300 dwellings (including 30% affordable housing) at Land off St Mary's Road, Hayling Island. The application is submitted by Gladman Developments Ltd (Gladman).

1.1.2 The description of development is as follows:

"Development of up to 300 dwellings (including affordable housing). The proposal also includes provision for structural planting and landscaping; informal public open space; children's play areas; sustainable drainage system (SuDS); a new vehicular access from St Mary's Road; and associated ancillary works. All matters reserved except for means of vehicular access"

1.2 The Development Plan

1.2.1 The starting point for the determination of this application is the Development Plan, comprising of the Havant Borough Core Strategy (adopted 2011) and Havant Borough Allocations Plan (adopted 2014)

1.2.2 As a matter of principle, the application proposals would be contrary to certain policies of the adopted Development Plan due to their location outside of the defined urban area for Hayling Island. However, it is the case that the housing supply policies of the Havant Borough Core Strategy and Allocations Plan were designed to meet housing needs for a different era, and furthermore that the Council are currently unable to demonstrate five-year housing land supply.

1.2.3 In the circumstances, the most important policies for determining the application are therefore considered to be out-of-date for the purposes of decision making and the proposals fall to be determined in accordance with the tilted planning balance and the Presumption in Favour of Sustainable Development.

- 1.2.4 The development, as proposed, is sustainable and will help to deliver new homes to meet local need, helping to address a key economic and social priority for the Government and Havant Borough Council. Significantly, the proposals would also align with the aspirations of the emerging Havant Borough Local Plan and the application site's status as an emerging allocation under policy H27 – Rook Farm.

1.3 Environmental Impact Assessment and Supporting Application Documents

- 1.3.1 As the application proposals are for urban development on a site of more than 0.5 hectares, the proposals fall under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017. Such projects require an EIA if the development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.
- 1.3.2 In this respect, in March 2017 during the course of determining Gladman's previous proposals for the current application site (discussed further in Section 1.5 below), the Council provided a Screening Letter that confirmed the proposals were adjudged to constitute EIA development.
- 1.3.3 A Scoping Opinion was subsequently provided by the local planning authority in September 2021, explaining that the following topics should therefore be considered as part of the Environmental Statement (ES) that has been submitted as part of the current application proposals:
- Air Quality
 - Ecology
 - Transport
 - Soils and Agricultural Land
 - Water Environment
 - Rights of Way, Access and Recreation
 - Vulnerability to Major Accidents and Disasters

- 1.3.4 The scope of the application is set out in the ES and other supporting documents, which also describe the nature and content of the development proposed. Details of the parameters of the development for which outline planning permission is sought are included within the ES and are also illustrated on the accompanying Development Framework Plan.
- 1.3.5 The defined parameters set out a 'worst case' scenario against which the environmental impacts of the proposed development can be assessed. In this respect, it should be noted that traffic data is based on a figure of up to 395 dwellings to align with the Council's emerging allocation for the site. The traffic and air quality assessments therefore represent a worst-case scenario and actual effects are likely to be reduced from those set out within the ES.
- 1.3.6 In addition to the ES, the following documents have also been submitted in support of the planning application:
- Site Location Plan
 - Planning and Affordable Housing Statement
 - Development Framework Plan
 - Design and Access Statement
 - Landscape and Visual Impact Assessment
 - Transport Assessment
 - Travel Plan
 - Phase 1 Site Investigation Report
 - Information for Habitats Regulation Assessment
 - Ecological Impact Assessment
 - Biodiversity metric
 - Flood Risk Assessment
 - Air Quality Assessment
 - Noise Assessment
 - Arboricultural Assessment
 - Phase 1 Geo-Environmental report

- Archaeology and Built Heritage Assessment
- Socio-economic Recovery following Covid 19
- Statement of Community Involvement
- Foul Drainage and Utilities Appraisal
- Soil Resources and Agricultural Quality

1.3.7 The information contained within the application documents provides the framework for future detailed Reserved Matter planning applications.

1.3.8 This Planning and Affordable Housing Statement explains why development is needed in this location and the significant social, environmental and economic benefits that the proposal will bring to the area. It also confirms, drawing on the supporting technical information, that no significant and demonstrable adverse impacts would arise as a consequence of the development, to outweigh these benefits.

1.3.9 The Statement further explains the policy context and how the proposed development complies with the Framework and why it is appropriate to bring forward development now at this site.

1.3.10 This Statement is one of a suite of documents submitted to support this application and comprehensively demonstrates the suitability and sustainability of the site for development, as proposed.

1.4 The Proposal

1.4.1 The drawings submitted as part of this outline planning application for approval are:

- Site location plan (drawing number: 7478-L-05 Rev C)
- Proposed site access layout (drawing number: P21033-001D)

1.4.2 The application proposal includes the following:

- Up to 300 residential dwellings (including 30% affordable housing delivered in accordance with current adopted planning policy);

- Structural landscape planting and the retention and positive management of key landscape features;
- 4.24 ha of green infrastructure (approximately 36% of the gross site outline application area), incorporating new informal and formal areas of open space;
- New access arrangements from St Mary's Road, accompanied by new footway links and connectivity with the wider Public Rights of Way (PRoW) network in the locality; and
- A comprehensive surface water drainage scheme in accordance with Sustainable Urban Drainage System (SuDS) principles

1.4.3 It is proposed that the site will be accessed from St Mary's Road, via a simple priority junction. It has been confirmed that the required visibility splays can be achieved and that the site access junction will operate comfortably within capacity in both the morning and evening peak periods with the proposed development traffic as demonstrated by the Transport Assessment prepared by Prime Transport Planning.

1.4.4 A range of densities and house types are proposed to meet local need, with 30% of the units being affordable in order to meet the requirement of current adopted local planning policy. Affordable housing provision will be secured by a Section 106 Agreement.

1.4.5 The illustrative Development Framework Plan for the site demonstrates how the built development will be set within a framework of open space and green infrastructure. The green space will include a formal locally equipped children's play area (LEAP), provision for teenagers and informal open space. The proposal seeks to retain existing landscape features; the existing hedgerows are maintained where possible and any loss will be mitigated elsewhere on site. The illustrative Development Framework Plan incorporates these elements within a strategic landscape framework.

1.5 Planning History

- 1.5.1 The current application proposals follow the submission of a previous planning application for the same site in December 2016 (Havant Borough Council application ref APP/17/00007).
- 1.5.2 This earlier application proposal sought outline planning permission for up to 210 residential dwellings, including 0.6 ha of land for apartments with care (Use Class C2), accompanied by structural planting and landscaping, public open space and a vehicular access point from St Mary's Road.
- 1.5.3 Whilst ultimately refused planning permission by decision notice dated 13th April 2017, it is considered that a number of reasons for refusal contained within the Council's decision notice could have been addressed through further dialogue with consultees during an extended determination period. As demonstrated through this statement and the accompanying technical documents, it is considered that all issues raised as part of the authority's previous reasons for refusal can now be satisfactorily addressed through the current application submission.

2 THE NATIONAL HOUSING CRISIS

2.1 Introduction

- 2.1.1 This section of the Planning Statement will set out the context to the national imperative to boost significantly the supply of housing, the response required of Havant Borough Council and the observed effects on affordability in the borough.

2.2 National Delivery of Housing

- 2.2.1 It is widely acknowledged at all levels that there is a housing crisis in this country, which has arisen as a direct consequence of too few houses being completed to keep pace with a growing population and household formation rates.

- 2.2.2 The solution to address this pressing national issue is a sum of the individual parts, i.e. every local authority must ensure that a five year supply of housing is achieved urgently against up to date, objective assessments of their needs.

- 2.2.3 The House of Lords Select Committee on Economic Affairs said:

To address the housing crisis at least 300,000 new homes are needed annually for the foreseeable future. One million homes by 2020 will not be enough.¹

- 2.2.4 In recognition of the national housing crisis, the government responded in the 2017 Autumn budget with a commitment to deliver 300,000 new homes a year. Since the start of the financial crisis, delivery of new homes has not yet come close to delivering this nationally recognised need:

Year	Net Additional Dwellings ²
2007/08	223,534
2008/09	182,767
2009/10	144,870
2010/11	137,394

¹ House of Lords Select Committee on Economic Affairs 1st Report of Session 2016–17 HL Paper 20 Building more homes

² Ministry of Housing Communities & Local Government *Table 122: housing supply; net additional dwellings, by local authority district, England 2001-02 to 2017-18* (Accessed January 2019)

2011/12	134,896
2012/13	124,722
2013/14	136,605
2014/15	170,693
2015/16	189,645
2016/17	217,345
2017/18	222,194
2018/19	241,335

- 2.2.5 Having regard to the evidence on past completions, it is self-evident that a significant step change is required in the delivery of new homes, in order to get anywhere close to meeting requirements and preventing the housing crisis from being exacerbated further.
- 2.2.6 In order to reach the government's targets, Kit Malthouse MP, Minister of State for Housing, Communities and Local Government recently said in *The Times*, "If we want to achieve 300,000 homes a year, we need to have one million homes in production and four to five million in planning."³
- 2.2.7 In 2017 consultancy Lichfield also identified that in order to meet the 300,000 a year delivery target, a constant stock of between 900,000 and 1.1 million of implementable planning permissions would be required⁴.
- 2.2.8 This application therefore responds to the national housing crisis and the need to grant additional planning permissions in order to meet the government's objectives. In addition, as will be explained later in this Planning and Affordable Housing Statement, this document responds to the local housing issues in Havant which are contributing to the problem overall.

2.3 The Local Authority Position

- 2.3.1 One effect of the national housing crisis is a profound effect on affordability. The following information, based on DCLG Live tables, demonstrates that the Council is

³ Anne Ashworth (2019) 'Kit Malthouse: It's time to 'keep calm and keep building'', *The Times*, 4th January 2019

⁴ Nathaniel Lichfield and Partners (2017) *Stock and Flow, Planning Permissions and Housing Output*, NLP, January 2017

failing to deliver the 504 homes each year that it needs. This has contributed to the increasing unaffordability of housing in the borough:

Year	2013	2014	2015	2016	2017	2018	2019	2020
Earnings Ratio	6.90	7.84	8.10	8.96	8.91	8.95	8.97	9.48

- 2.3.2 Mortgage lenders typically offer loan to income ratios from 3.25 annual salary up to a cap at around 4.5 times annual salary. More often than not this requires a deposit and loan to value (LTV) ratio of 95%. As can be seen from the data, house prices reduced during the recession to just above current national average ratios in 2009. Since then, house prices to lower quartile earnings have increased beyond even those of the peak of 2007.
- 2.3.3 It is also true that there has been a failure to deliver the 361 affordable houses required in the borough each year dwellings against the needs identified within the 2014 South Hampshire Strategic Housing Market Assessment (SHMA).
- 2.3.4 MHCLG Live Table 1011C provides a detailed breakdown of new build affordable housing completions by Local Authority. For Havant borough, delivery over the past six years has been as follows:

Year	Total Required	Total Affordable Completions	Total Completions v. Total Need
2015/16	361	110	-251
2016/17	361	130	-231
2017/18	361	67	-294
2018/19	361	84	-277
2019/20	361	38	-323
2020/21	361	33	-328
Total	2,166	462	-1,698

- 2.3.5 It is clear that this delivery of 462 affordable dwellings over the past six years is significantly short of the need identified in the SHMA.

2.3.6 The reality is therefore that those most in need in borough are unable to afford to buy their own homes.

3 SITE AND LOCATIONAL SUSTAINABILITY

3.1 Site Location

- 3.1.1 The 11.77 ha site lies adjacent to existing residential development in Hayling Island. St Mary's Road runs parallel to the eastern and southern boundary of the site, whilst publicly accessible open space and Hayling Island Holiday Park occupy the area immediately north of the site.

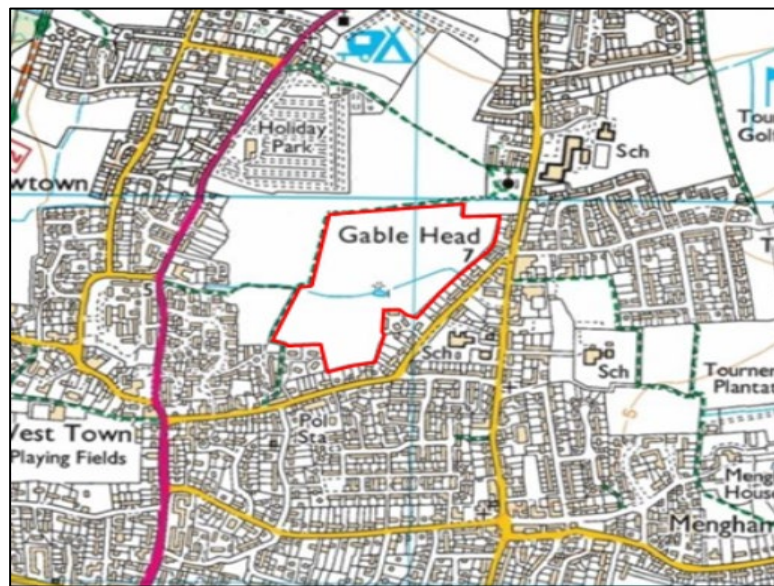


Figure 1 - Land off St Mary's Road - Site Location Plan

- 3.1.2 The development site falls within the administrative authority of Havant Borough Council, which also covers the nearby towns of Waterlooville, Bedhampton and Havant. Hayling Island lies approximately 2.5km to the south of Havant town itself, with Chichester and Portsmouth lying approximately 24km east and 18km west of the site respectively in the wider surrounding area.
- 3.1.3 The site is in a sustainable location and will be able to make a valuable contribution to the supply of housing within the Havant Borough area. This is further emphasised by the site's identification as a draft allocation in the emerging Havant Borough Local Plan under Policy H27, Rook Farm, as shown in Figure 2 overleaf.

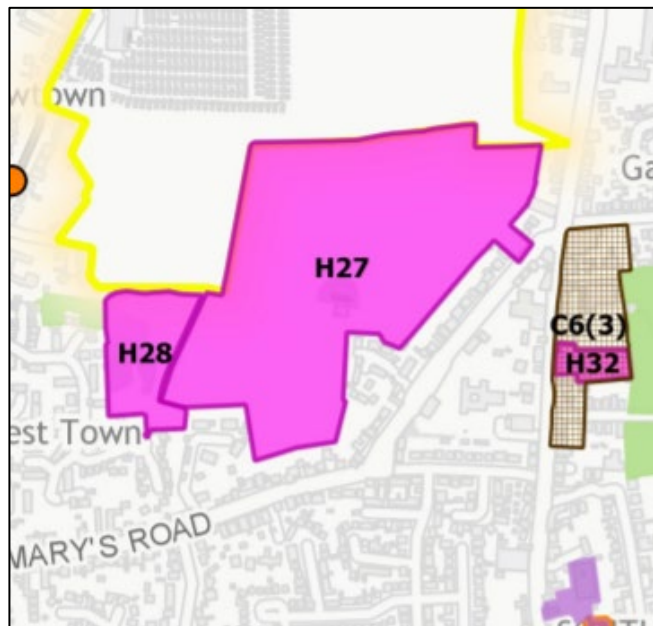


Figure 2 Land off St Mary's Road/Rook Farm - Proposed Allocation

3.2 Suitability of Location

- 3.2.1 The application site currently comprises of two main field compartments that are currently in agricultural use, alongside a further, smaller area of grassland/unmaintained land, a pond and an agricultural building. As outlined above, the site is well related to the settlement, with good pedestrian and cycle links and it is contained by physical features at its urban edge.
- 3.2.2 The site is situated in a sustainable location and benefits from its close proximity to the existing range of shops and services that are available in the South Hayling/Gable Head/West Town settlement area, allowing easy access by foot and bicycle. The site's proximity to key services and facilities is shown in Figure 11 of the Design and Access Statement (DAS) and details of facilities are shown within the Transport Assessment at Tables 5.2 and 5.3, which illustrate that a wide range of amenities are within recommended guideline walking and cycling distances.
- 3.2.3 Growth at the Land off St Mary's Road site will both support, and be supported by, a range of services and facilities that are within easy walking and cycling distance. These include, but are not limited to Mengham Infant and Junior Schools, Mill Rythe School, the Hayling College, Hayling Island Health Centre, a Sainsbury Local/Tesco

Express/Co-Operative Foodstore, Hayling Island Community Centre, as well as a wider range of local services and amenities situated in the South Hayling and West Town District Centres.

- 3.2.4 The site is also sustainably located in relation to public transport. The nearest bus stops to the site are situated on Church Road opposite and adjacent to Tournurbury Lane, within 400m of the proposed site access from St Mary's Road. They are served by bus services 30 and 31 which provide 1-2 services per hour in a clockwise and anticlockwise direction respectively between Havant and Hayling Island, Mondays to Saturdays, and one service per hour on a Sunday.
- 3.2.5 Combined the two services provide up to four services per hour in the weekday peak period, with the first number 30 service departing the Church Road bus stops at 06:02 and the last return 31 service returning from Havant at 22:00. The services provide a convenient public transport link between the application site and Havant town centre, Langstone Technology Park and the Solent Retail Park. They also connections to be made to train services at Havant railway station, which is a short walk from Havant bus station.
- 3.2.6 The following is relevant in terms of the site's suitability and sustainability for development:
- The site is well contained within the landscape and important trees and other landscape features are retained;
 - The local highway network has capacity to accommodate the additional traffic associated with the development, without adverse impact;
 - Whilst the accompanying Soils and Agricultural Land Quality report finds that the site is comprised of Grade 2 and 3a agricultural land, it has been accepted that the development of some Best and Most Versatile agricultural land is necessary to meet the area's needs;
 - The majority of the site's features are of low ecological value on the basis of the evidence submitted with the application (Ecological Impact

Assessment prepared by CSA Environmental) and mitigation and net biodiversity gains can be readily achieved;

- A suitable mitigation strategy can be delivered to address the site's status as a Core Area for dark-bellied brent geese in the Solent Waders and Brent Goose Strategy (SWBGS), at the same time as achieving nutrient neutrality for the application proposals;
- The site can be sensitively developed to respect the significance and setting of nearby heritage assets. There would be a negligible impact on the significance of Rook Farmhouse and Farm Cottage, whilst the proposals have been specifically designed to respect the Grade II* Listed St Mary's Church;
- The application site falls within the EA Flood Risk Zone 1 (i.e. land assessed as having a less than 1 in 1,000 annual probability, or <0.1% chance of flooding);

3.2.7 The DAS prepared by FPCR and submitted in support of the application sets out how the site can accommodate the quantum of development proposed in a manner which reflects the local landscape character and the edge of the existing settlement area.

3.2.8 In summary the application site presents an opportunity for sustainable growth:

- The land to which the development proposals relate is not of high environmental value.
- The site is suitable for residential development in terms of its general location and characteristics.
- There are opportunities through development to improve the environmental conditions of the area.

4 THE DEVELOPMENT PLAN

4.1 Introduction

4.1.1 At the time of writing, the adopted Development Plan applicable to the site comprises:

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

4.1.2 Reviewing the Hampshire Minerals and Waste Local Plan for Hampshire has not identified any policies of relevance to the application site. Therefore, these plans are not considered further in this planning statement.

4.1.3 By virtue of development being located beyond the defined urban area of Hayling Island, it is accepted that the residential element of the proposed development is in conflict with certain policies of the adopted Development Plan. However, it is the case that material considerations exist to justify a departure from the Plan in this instance.

4.1.4 This section describes the adopted and emerging Development Plan for the site and considers the relevance and weight that should be attributed to the policies contained within it.

4.2 The Development Plan: Weighting

4.2.1 Section 38(6) of the Town and Country Planning and Compulsory Purchase Act 2004 places a statutory duty on local planning authorities to determine planning applications in accordance with the development plan unless material planning considerations indicate otherwise. Section 39 of the Act requires decision makers to exercise their functions with the objective of contributing to the achievement of sustainable development.

- 4.2.2 The Framework is a material planning consideration but does not change the statutory status of the Development Plan as the starting point for decision making.

Paragraphs 2 and 12 of the Framework confirm:

2. **Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.**
12. **The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.**

- 4.2.3 Further, in determining the weight to relevant policies the guidance at paragraph 219 of the Framework confirms:

"...existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)."

- 4.2.4 The planning application should be considered in this context.

4.3 **Five-Year Housing Land Supply**

- 4.3.1 The supply of available and deliverable sites for housing in the Havant Borough area is a material consideration in determining the weight to relevant policies for the supply of housing. Paragraph 11 and footnote 8 of the Framework states:

"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-date⁸, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

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. "

...

"This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 74); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. Transitional arrangements for the Housing Delivery Test are set out in Annex 1."

- 4.3.2 The Framework requires local planning authorities (LPAs) ensure a continued supply of land to meet five years' worth of housing requirements, with a delivery buffer of either 5%, 10% or 20% (moved forward from later in the plan period) depending on past performance. Local authorities should also make every effort to redress previous underperformance within the immediate 5-year period (commonly referred to as the 'Sedgefield Approach') and the delivery buffer should be applied to both the requirement and the accrued backlog.
- 4.3.3 The latest five-year housing land supply position for the Havant Borough area is provided in the Council's November 2021 Five Year Housing Land Supply Update. Based on the authority's Local Housing Need figure of 506 dwellings per annum and incorporating a 20% buffer in accordance with the latest 2020 Housing Delivery Test

Measurement, the latest update shows that the Council can currently claim a deliverable housing land supply of 3.9 years for the period 2020/21 – 2024/25.

- 4.3.1 In addition, the latest 2020 Housing Delivery Test Measurement for Havant also identified that the total number of homes supplied over the period 2017/18 – 2019/20 in the Havant borough area equated to 72% of the total number of homes required, resulting in the application of the Presumption in Favour of Sustainable Development.
- 4.3.2 There has been a failure to deliver the required level of market and affordable homes that are needed to meet the Havant borough area's needs.
- 4.3.3 The market and affordable homes proposed on the application site could make a significant contribution to housing supply the next five years, therefore helping to address the immediate lack of a five-year supply of deliverable housing sites. The site would also provide homes beyond this period to assist the Council in maintaining a five-year housing land supply.

4.1 The Adopted Development Plan

- 4.1.1 The Havant Borough Core Strategy was adopted in March 2011 to guide development in the Borough until 2026. The Core Strategy seeks to provide land for 6,300 dwellings from 2006 to 2026 (**Policy CS9**), equating to 315 dwellings per annum, derived from the housing targets contained in the now revoked South East Plan.
- 4.1.2 The application proposal, which is for residential development that would form an extension to the built-up area of Hayling Island, would therefore in principle be contrary to **Policies CS17 and AL2** of the Havant Core Strategy and Allocations Plan, which seek to concentrate development within the urban areas of the borough.
- 4.1.3 However, it is the case that the housing supply policies of the Core Strategy and Allocations Plan, including Policies CS17 and AL2 are now seeking to plan for levels

of housing from a different era and are falling some way short of delivering a sufficient supply of homes to meet Havant's full housing needs.

- 4.1.4 The extent of borough's urban areas must inevitably change in order to accommodate more recent, and higher, up-to-date evidence of Havant's housing needs. Indeed, the Council have accepted this in principle through a commitment to allocate further greenfield sites for development beyond the existing urban limits as part of its emerging Local Plan proposals. This includes the proposed allocation of the application site under Policy H27 – Rook Farm.
- 4.1.5 For these reasons, it is considered that any conflict with Policies CS9, CS17 and AL2 should now be accorded limited weight in the determination of the application proposals. The location of the application site, immediately adjacent to existing residential development cannot therefore be a reason in principle for resisting development.
- 4.1.6 Alongside the absence of a five-year housing land supply, it is therefore the case that the most important policies for determining the application proposals (notably Policies CS9, CS17 and AL2) are now out of date for the purposes of decision making and should be afforded limited weight in the planning balance.
- 4.1.7 As a consequence, the application proposals fall to be determined in accordance with the tilted planning balance contained within paragraph 11d of the Framework.
- 4.1.8 In relation to consistency with other relevant policies of the Core Strategy and Allocations Plan:
- **Policy C11 (Protecting and Enhancing the Special Environment and Heritage of Havant Borough)** outlines how planning permission will be granted for development that protects and where possible enhances the borough's statutory and non-statutory designated landscapes, habitats and features of biological interest, and statutory and non-statutory heritage designations. In this respect, the application proposals have been carefully designed to respect the character of their setting and are accompanied by

an Ecological Impact Assessment (EclA) that assess their potential effects on protected habitats and species. The proposals have also been purposefully designed to respect the setting of nearby heritage assets.

- **Policy CS13 (Green Infrastructure)** sets out that development will be permitted that incorporates, where appropriate, improvements to existing green infrastructure and creates new green infrastructure either on site or through financial contributions. In this regard, the application proposals will be accompanied by 4.24 ha of new and enhanced green infrastructure, in accordance with the aspirations of this policy.
- **Policy CS16 (High Quality Design)** outlines how 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. Whilst the current application proposals are submitted in outline, the Design and Access Statement that accompanies the application submission demonstrates how the requirements of this policy could be met at the reserved matters stage.
- **Policy CS20 (Transport and Access Strategy)** details how development will be permitted that does not increase congestion and promotes better use of existing transport networks and maintains or improves the range of transport modes accessible to users of the development site. In this respect, the accompanying Transport Assessment details how the application proposals would not have an unacceptable impact on the operation of the local highway network, whilst the supporting Travel Plan will encourage the uptake of sustainable travel habits and greater use of sustainable modes of transport.
- **Policy DM23 (Sites for Brent Geese and Waders)** outlines that where a negative impact upon a site that is important for Brent Geese and/or waders outside of the statutorily designated sites cannot be avoided or satisfactorily mitigated, and the tests of the Habitats Regulations are met as necessary, replacement feeding/roosting habitat, on a no net loss basis, will be sought.

As detailed within the accompanying Information for Habitats Regulations Assessment (iHRA) and discussed further in relation to the emerging Havant Local Plan below, Gladman propose to establish and fund the in-perpetuity management of a permanent brent goose on Hayling Island, such that the application site's status as a Core Area for dark-bellied brent geese in the SWBGS will be successfully mitigated.

- **Policy DM24 (Recreational Disturbance to Special Protected Areas (SPAs)** from Residential Development) outlines how planning permission will be granted for residential developments that avoid or mitigate a likely significant effect on the SPAs, caused by recreational disturbance through the in-combination effect of net additional dwellings. The requirements of this policy will be fulfilled by the provision of appropriate developer contributions in accordance with the Solent Recreation Mitigation Strategy (SRMS).

4.2 The Emerging Development Plan

Havant Borough Local Plan 2037

- 4.2.1 Alongside the provisions of the adopted Local, Havant Borough Council are currently in the process of preparing a new Local Plan document that will set of the development strategy for the borough up to 2037, and which once adopted will supersede the policies of the Havant Borough Core Strategy and Local Plan Allocations in the Development Plan for the borough.
- 4.2.2 The emerging Local Plan is now nearing an advanced stage of preparation, having been formally submitted to the Secretary of State for Examination on 12th February 2021.
- 4.2.3 The Examination process is being undertaken in two stages. Stage 1 Examination hearings, which explored some of the more strategic matters arising from the authority's emerging strategy took place between 12th and 16th July 2021. It is currently envisaged that this will then be followed by a series of Stage 2 Examination

hearings that are likely to focus on more specific policy issues, including the potential consideration of omission sites.

- 4.2.4 On the 4th November 2021, the Inspectors' Interim Findings Report for the Stage 1 Examination hearings was published on the Havant Borough Council website. This identified a number of concerns with the Council's emerging strategy as submitted, as well as matters of legal compliance. The Inspector's overall recommendation was that the most appropriate course of action may be to withdraw the Local Plan so that further work could be undertaken to address the identified shortcomings.
- 4.2.5 Havant Borough Council responded to the Planning Inspectorate on 4th November and in a subsequent letter dated 11th November to request that the Examination remain open whilst further clarification is sought from Inspectors' on the most appropriate means of progressing the Examination process.

Emerging Local Plan Proposals – Policy H27 Rook Farm

- 4.2.6 As described above, within the Council's Pre-Submission Local Plan document, Land off St Mary's Road has been identified as a draft allocation under Policy H27, Rook Farm. This identifies how the application site is considered to represent a sustainable and suitable location for a residential development of up to 390 dwellings.
- 4.2.7 Gladman have carefully reviewed the emerging requirements of Policy H27 and have sought to ensure that our application proposals are aligned with the Council's aspirations for the site wherever possible, as notably detailed below.
- 4.2.8 However, this must also be viewed in the context of our previous representations on the emerging Local Plan, which have suggested potential revisions to Policy H27's requirements. This is particularly relevant in relation to Council's suggestion that vehicular access to the site should be achieved from Manor Road/Lulworth Close, in preference to St Mary's Road which is in the applicant's control.
- 4.2.9 In relation to **development scale**, it is noted that the emerging Rook Farm allocation is for up to 390 dwellings. However, a detailed appraisal of site constraints during

the preparation of our application proposals has identified that up to 300 dwellings can be realistically delivered on the site, at a density of 40 dph. This principally takes account of the requirement to retain view corridors to St Mary's Church, as well as retaining/delivering other necessary landscaping, green infrastructure and site drainage features.

- 4.2.10 On the topic of **site access**, as submitted for Examination, the Local Plan requested that vehicular access for Policy H27 is taken from Manor Road, however this was subsequently changed to Lulworth Close after an acceptance that access from Manor Road would not be technically feasible. Detailed submissions on the issue of site access have been through our Local Plan representations and our participation in the recent Stage 1 Local Plan Examination hearings. In doing so, we have demonstrated why vehicular access must be taken from St Mary's Road and how this would be technically deliverable and wholly suitable to serve the development of the site
- 4.2.11 Finally, on the subject of **brent geese and waders**, Policy H27 and the associated provisions of Policy E17 outline how development proposals for Rook Farm will be permitted where suitable replacement habitat to mitigate the site's status as a Core Area for Brent Geese and Wader will be provided in perpetuity as part of the Hayling Island Brent Goose Refuge or alternative provision agreed in consultation with the local planning authority. In this regard, the accompanying iHRA describes how Gladman propose to establish and fund the in-perpetuity management of brent goose and wader refuge on Hayling Island that will satisfy this element of Policy H27 and Policy E17.
- 4.2.12 For reasons for commercial confidentiality, the precise location of the proposed mitigation site has been redacted from the submitted iHRA. Further dialogue will take place with Natural England and the local planning authority to discuss and finalise the details of the proposed mitigation strategy during the application's determination, such that it can be concluded that the development of the application site would not have an adverse effect on the relevant European Sites. It

is envisaged that the development of the application site would be conditional on the satisfactory delivery and completion of the proposed mitigation scheme, via an accompanying legal agreement or suitable planning conditions.

- 4.2.13 It is noted that the Inspector's Interim Findings on the Stage 1 Examination Hearings have also highlighted concerns over the absence of a deliverable Brent Goose mitigation strategy in relation to the requirements of Policy H27. However, as described above and highlighted within the submitted iHRA, we are confident that a suitable and deliverable mitigation scheme can be secured and identified, such that the corresponding requirements of the Habitats Regulations and this element of Policy H27 can be met. This would not therefore pose a constraint to the development of the Rook Farm site.
- 4.2.14 It is considered that all other relevant requirements of Policy H27 can be satisfied as part of the application submission and through subsequent reserved matters submissions. This includes an appropriate relationship between the proposed application site and the rear of residential properties on St Mary's Road, Church Road and Fathoms Reach, a high degree of permeability and accessibility, protection of existing Public Rights of Way, and potential connectivity with the adjacent Fathoms Reach allocation (Policy H28)
- 4.2.15 Overall, it is therefore considered that the application proposals are consistent with the aspirations of the Council's emerging development strategy for the borough and will align with authority's objectives for Policy H27 and the Rook Farm site.

Policy EX1 – Water Quality Impact on the Solent European Sites

- 4.2.16 In light of the potential for new residential development or overnight accommodation to increase nutrient loads within the marine environment of the East Solent system, emerging Local Plan Policy EX1 outlines how new residential proposals must be accompanied by a nutrient budget and appropriate mitigation to demonstrate that they will be 'nutrient neutral'.

- 4.2.17 In this regard, the accompanying iHRA describes how the proposed establishment of a permanent Brent Goose refuge in connection with the application proposals would also be capable of mitigating/offsetting the nutrient budget for the scale of development proposed. This would be achieved through the transferal of the proposed mitigation land from cereal cropping to a nature reserve.
- 4.2.18 This would result in a potential 'nitrogen negative' position (i.e. a betterment), thereby satisfying the requirements of this policy and also the corresponding requirements of the Habitats Regulations.

Weight to be Afforded to the Emerging Local Plan

- 4.2.19 Paragraph 48 of the Framework provides guidance on the weight to be attributed to adopted and emerging plans. It allows decision makers to give weight to existing and emerging plan policies according to their degree of consistency with the Framework and in regard to emerging policies, the stage of preparation and the extent of any unresolved objections to it.
- 4.2.20 Whilst the weight that can currently be afforded to the emerging Local Plan is tempered by its stage of preparation, its contents provide a clear direction of travel on the development strategy for the borough and the suitability and sustainability of the application site as a location for further housing development.

Summary of the Development Plan

- 4.2.21 In the light of the above, it is clear that the development proposal accords with all parts of the Development Plan that are up to date.
- 4.2.22 Where a conflict arises, those policies are either out of date or should be accorded limited weight due to their conflict with the more up to date provisions of the Framework. As a result, the conflict with those policies should be accorded corresponding limited weight.
- 4.2.23 The application falls to be determined in accordance with the tilted planning balance. Section 5 below demonstrates how there are no adverse impacts that

would significantly and demonstrably outweigh the benefits of granting planning permission in this instance.

5 SUSTAINABLE DEVELOPMENT: THE NATIONAL PLANNING POLICY FRAMEWORK

5.1 Introduction

- 5.1.1 The government published a revised Framework in July 2021.
- 5.1.2 This section of the Planning Statement sets out why the planning application meets with the objectives of the Framework in delivering sustainable development.

5.2 The Presumption in Favour of Sustainable Development

- 5.2.1 At the heart of the Framework is the 'presumption in favour of sustainable development' (paragraph 10). For decision-taking this means approving development where it accords with an up-to-date development plan, or where there are no relevant development plan policies or where the policies which are most important for determining the application are out-of-date, granting permission unless adverse impacts would significantly and demonstrably outweigh the benefits, or policies in the Framework indicate development should be restricted (see paragraph 11).
- 5.2.2 The relevant technical reports that accompany this planning application demonstrate that there are no unacceptable adverse impacts that would significantly and demonstrably outweigh the benefits associated with the proposals,
- 5.2.3 The accompanying iHRA further demonstrates that the application proposals would not give rise to any adverse effects on European Sites in respect of the Habitats Regulations, whilst it is considered that the less than substantial harm to the significance of the Grade II* Listed St Mary's Church would be outweighed by the public benefits arising from the proposals.
- 5.2.4 Accordingly, this is not therefore an instance where any of the designations cited within footnote 7 of the Framework would apply to indicate the Presumption should be disapplied.

5.2.5 The remainder of this section describes how the development proposals meet the relevant objectives of the Framework.

5.1 Building a Strong and Competitive Economy

5.1.1 The Framework is clear that the government is committed to delivering sustainable economic growth identifying that planning policies should, "positively and proactively encourage sustainable economic growth." (paragraph 82).

5.1.2 Housing development is a key component of economic growth and this is fully recognised in Government policy and more recently the White Paper – Fixing our broken housing market (2017), which states on page 15:

"If we fail to build more homes, it will get ever harder for ordinary working people to afford a roof over their head, and the damage to the wider economy will get worse."

5.1.3 Through the development of the site a significant amount of investment will be made to the area in terms of the construction value of the project and associated spend during the construction period. The construction industry and house building in particular make an important contribution to both the local and national economy in terms of job creation. The accompanying Socio-economic Recovery Statement estimates the following key benefits arising from the proposal:

- Construction spend - £39.2m
- GVA over the build period - £14.76m
- Resident annual expenditure - £10m per annum
- Council tax - £5m
- New Homes Bonus - £1.5m

5.1.4 The provision of quality housing on Hayling Island is central to the achievement of sustainable economic growth across Havant and is fully supported by the requirements and advice of the Framework; indeed, paragraph 81 is clear that, "significant weight should be placed on the need to support economic growth through the planning system".

5.2 Promoting Sustainable Transport

- 5.2.1 At paragraph 104, the Framework requires LPAs to consider transport issues from the earliest stages of the plan-making process and development proposals, encouraging:

"...opportunities to promote walking, cycling and public transport use..."

- 5.2.2 At paragraph 105, the Framework requires significant development to:

"...be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."

- 5.2.3 As described in Section 3 above, the South Hayling/Gable Head/West Town settlement area has a number of services and facilities which are within easy walking and cycling distance of the site, including but not limited to a number of infant, junior and secondary/post-16 education establishments, Hayling Island Health Centre, a Sainsbury Local/Tesco Express/Co-Operative Foodstore, Hayling Island Community Centre, and a wider range of local services and amenities situated in the South Hayling and West Town District Centres.
- 5.2.4 The nearest bus stops to the site are situated on Church Road opposite and adjacent to Tournerville Lane, within 400m of the proposed site access from St Mary's Road. They are served by bus services 30 and 31 which provide 1-2 services per hour in a clockwise and anticlockwise direction respectively between Havant and Hayling Island, Mondays to Saturdays, and one service per hour on a Sunday.
- 5.2.5 Combined these services provide up to four services per hour in the weekday peak period and offer a convenient public transport link between the application site and Havant town centre, Langstone Technology Park and the Solent Retail Park. They also allow connections to be made to train services at Havant railway station, which is a short walk from Havant bus station.

- 5.2.6 To support the application a Transport Assessment (TA) has been undertaken which confirms that the site is well located in relation to sustainable transport options and is well positioned in relation to the local and strategic highway network.
- 5.2.7 Access will be achieved via a simple priority junction from St Mary's Road, accompanied by two footways that will tie into the existing footpath provision on St Mary's Road, which itself will be extended further south-west. The proposed access has been positioned in the optimum location at the site frontage following a detailed swept path analysis and has also be subject to an independent Road Safety Audit.
- 5.2.8 The TA also sets out a number of proposals for additional off-site highway improvements, including the provision of new uncontrolled crossing points and pedestrian refuge islands on Church Road/Elm Grove and a traffic island across the St Mary's Road arm of the Church Road/Elm Grove/Tournerbury Lane/St Mary's Road junction. The applicant is also willing to fund a traffic regulation order (TRO) to reduce the speed limit on St Mary's Road to 20mph along with an accompanying traffic calming scheme, if this is deemed to be required by the local highways authority.
- 5.2.9 The accessibility of the site will be further enhanced by the provision of two pedestrian accesses on to PRow/Footpath 94, which provides onward connections to the wider PRow network in the vicinity of the site. As detailed above, there is also the potential to provide connectivity with the adjacent Fathoms Reach allocation (emerging Local Plan Policy H28) as part of the application site's development.
- 5.2.10 A range of improvements are proposed to enhance pedestrian access, details of which are contained in the TA. The TA confirms that the package of measures proposed offers accessibility enhancements to encourage more sustainable means of travel in the area and will mitigate any significant impacts on the highway.

5.3 Delivering a Wide Choice of High Quality Homes

The Need for Market and Affordable Housing

- 5.3.1 There is a wealth of evidence from figures at the highest levels of the Government, the Bank of England and internationally, within the European Commission and International Monetary Fund, which demonstrate that there is a consistent and pressing requirement to build more homes to meet the significant level of unmet need, particularly for homes that are affordable. In the foreword to the White Paper 'Fixing the Broken Housing Market', then Prime Minister Theresa May stated:

"Our broken housing market is one of the greatest barriers to progress in Britain today. Whether buying or renting, the fact is that housing is increasingly unaffordable – particularly for ordinary working class people who are struggling to get by.

Today the average house costs almost eight times average earnings – an all-time record. As a result it is difficult to get on the housing ladder, and the proportion of people living in the private rented sector has doubled since 2000."

- 5.3.2 The government outlined its aim to build 300,000 homes per year in the Autumn Budget 2017. Delivery of this site will contribute to this delivering the housing the country needs.
- 5.3.3 In addition to a pressing need for new market homes in Havant and detailed in Section 2 above, there is a significant need for affordable housing, as outlined within the 2014 South Hampshire Strategic Housing Market Assessment.
- 5.3.4 Recent records of affordable housing delivery in the borough suggest that the Council are falling someway short of supplying the 361 affordable homes that are required in the borough each year. The scale of affordable housing need in LPA, combined with levels of affordable and market housing delivery that have not met demands, is leading to a chronic shortage of much needed new homes.
- 5.3.5 The UK has a persistent problem with inadequate housing supply, which has led to low income and middle income families being priced out of the housing market. National Government recognise that house price inflation is getting to dangerous

levels and that building new homes is necessary in order to address this issue. The delivery of 30% affordable homes should be given significant weight.

Ensuring Choice in the Competition for Land

- 5.3.6 The Framework sets out the Government's key housing objective, which is, "to boost significantly the supply of housing". Paragraph 74 sets out how LPAs should achieve this boost in the supply of housing, including a requirement to provide a delivery buffer of 20% where there has been a persistent under delivery of housing, to ensure choice and competition in the market for land.
- 5.3.7 The proposals entirely accord with this national policy objective in so far as the application will deliver new housing development which will assist the Council to contribute towards the central government objective of boosting significantly the supply of housing now.

5.4 Achieving Well-Designed Places

- 5.4.1 The DAS demonstrates how the scheme will deliver a high quality residential sustainable development. The proposals are based on sound design principles that have taken into account site constraints and opportunities presented by the site.
- 5.4.2 Whilst design is a matter reserved for future determination, the DAS demonstrates the site could accommodate a scheme that would be in scale and character with its surroundings through delivering dwellings of a suitable size and through utilising materials that reflect the local vernacular. It is demonstrated through the DAS and TA that the site would be accessible to people on foot, cycle and to those with disabilities. The illustrative master plan seeks to create an attractive place that responds to the attributes of the site and the local context.
- 5.4.3 The development has been designed taking into account the recommendations of the Landscape and Visual Assessment (LVA). The green infrastructure within the built development will sit as an integral part of the framework and is key in creating an accessible, open and engaging place within which to live. The proposal provides a strong green framework comprising;

- The creation of a 4.24 ha of Green Infrastructure comprising a variety of potential habitats and open space and incorporating a locally equipped area for play, provision for teenagers and an allotment/community garden area;
- Reinforcement of existing hedgerows and vegetation within the site and along its boundaries to improve the quality and connectivity of habitat; and
- The provision of a green corridor/areas of open space that have been designed to enhance retained views of St Mary's Church, which will also assist in enhancing the connectivity of on-site green infrastructure and provide recreation and wildlife benefits.

5.5 Conserving and Enhancing the Natural Environment

- 5.5.1 The site is not subject to any landscape quality designation and lies outside of the National Park, AONB and any locally designated landscape areas? The site, nor the immediate landscape, contains any rare or unusual landscape features and so the LVA prepared for the application concludes the site does not comprise a valued landscape.
- 5.5.2 Development will result in a permanent change to the character of the application site however the proposals will aim to retain notable existing landscape features where evident such as boundary hedgerows, mature hedgerow trees, a small pond and drainage ditches. It is therefore considered that the site's landscape character has the ability to absorb change through the introduction of a high-quality development.
- 5.5.3 The accompanying Landscape and Visual Assessment (LVA) concludes that the proposed development would not give rise to any unacceptable landscape and visual harm. Overall, the proposals are considered to be well contained adjacent to the existing urban context and therefore the proposals would have a negligible effect on the wider landscape.

- 5.5.4 The Ecological Impact Assessment and Information for Habitats Regulations Assessment report confirm that the proposals will not give rise to any unacceptable impacts on statutorily designated sites or protected species that could not be mitigated through a range of tried and tested mitigation techniques. Overall, the proposals have the potential to achieve an overall net gain in biodiversity through features that include the provision of new landscape planting and habitat creation, the inclusion of plant species of wildlife value, new bat roosting and bird nesting opportunities.
- 5.5.5 As described above, it is acknowledged that the application proposals have the potential to give rise to a significant adverse effect on European Sites through increased recreation pressure, the loss of supporting habitat for dark-bellied brent geese (consistent with the application site's status as a 'Core Area' under the SWBGS), together with an increase in vehicle emissions and eutrophication (foul water discharges).
- 5.5.6 However, the accompanying iHRA report describes how the application proposals would not give rise to air quality impacts either alone or in combination with other plans and projects. It further describes how the status of the application site as a Core Area for dark-bellied brent geese can be suitably mitigated through the provision and in-perpetuity management of the brent goose refuge, which would also offset the nutrient budget associated with the application proposals. An appropriate mitigation payment would also be made to address increased recreational pressure, in accordance with the SRMS.
- 5.5.7 Through the implementation of these mitigation measures, it can therefore be concluded that application proposals would not give rise to any remaining adverse effects on the integrity of these European Site designations.
- 5.6 Meeting the Challenge of Climate Change
- 5.6.1 Paragraph 152 of the Framework requires the planning system to "help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions..."

The application proposal meets these criteria as it will be delivered to the relevant Building Regulations or equivalent standard applicable at the time of permission.

- 5.6.2 The accompanying Flood Risk Assessment (FRA) further describes how the entirety of the application site is situated in Flood Zone 1 in respect of fluvial flooding and is assessed as being at negligible – low risk of flooding from other sources, alongside recommendations for how any residual risk can be mitigated. The FRA also discusses the measures that are in place in the event of a flooding event that affects the A3023 Langstone Bridge, with reference to the 2021 Hayling Island Emergency Planning Framework.

5.7 Conserving and Enhancing the Historic environment

- 5.7.1 Section 16 of the Framework provides policy guidance on the conservation and investigation of heritage assets.
- 5.7.2 The Built Heritage and Archaeological (BHA) assessment produced by Pegasus Group has identified there is no evidence for medieval or later settlement activity within the site, and it is thought to have comprised farmland from the medieval period onwards. As such any unknown archaeological features dating to the medieval and post-medieval periods are likely to comprise agricultural features of low archaeological significance. Such features might include remains of field boundary ditches and drainage ditches or channels.
- 5.7.3 The BHA concludes that the application proposals would have a negligible impact on the significance of the Grade II Listed Farm Cottage and Rook Farmhouse, and no impact on the significance of the Grade II Listed Newton House Hotel and Flint Cottage. It further describes how any impact on the significance of the Grade II* Listed Church of St Mary would be limited and fall within the category of less than substantial harm.
- 5.7.4 Paragraph 202 of the Framework makes clear that where a development proposal which will lead to less than substantial harm to the significance of a designated

heritage asset, this harm should be weighed against the public benefits of the proposal.

- 5.7.5 In this respect, it considered that the level of harm caused to St Mary's Church would be outweighed by the public benefits arising from the application proposals. Care has been taken to purposefully design an illustrative site layout that respects the setting and significance of this heritage asset.

5.8 Summary

- 5.8.1 From the above, it is clear that the application proposal complies with relevant provisions of the Framework. Accordingly, it can reasonably be concluded that the proposal is also in compliance with the broad planning objectives of the Framework.
- 5.8.2 The assessment against the relevant policies does not indicate any circumstances under which permission should be restricted which might result in the disapplication of the presumption in favour of sustainable development.

6 Planning Balance and Conclusions

6.1 Summary of Case and Identified Benefits and Harm

- 6.1.1 The outline planning application is made in the context of the government's requirement to boost housing land supply and the presumption in favour of sustainable development.
- 6.1.2 The proposal responds positively to the identified lack of a five-year housing land supply in Havant and the identified needs for both market and affordable housing in the authority. Significantly, it also aligns with the aspirations of the Council's emerging Local Plan in respect of Policy H27, Rook Farm.
- 6.1.3 This proposal would be deliverable in the short term and increase the supply and choice of housing at a preferred location for growth within the authority area. It would contribute towards economic growth and have wider social benefits to the local community, meeting a range of housing requirements, including affordable housing. The principles outlined within the DAS would secure a high-quality scheme.
- 6.1.4 The supporting material, assessments and reports demonstrate that there are no technical or environmental constraints that would preclude the development of this site, subject to planning conditions and/or obligations. Gladman is willing to enter into constructive dialogue with the Council to agree a list of conditions and Section 106 Heads of Terms that are necessary to make the development acceptable in planning terms.
- 6.1.5 As with any greenfield site, the development will introduce changes to the area and some urbanising effects. Care has been taken to ensure that the perceived impact on the local area is minimised and acceptable, through careful design and siting, the provision of extensive open space along the western, northern and eastern edges of the site and through taking an holistic approach to landscape provision at the site.

- 6.1.6 The development of the site, as proposed, would be both suitable and sustainable, and there is justification to grant planning permission in accordance with the presumption in favour of sustainable development.
- 6.1.7 The application proposals, which are for residential development that would form an extension to the built-up area beyond the defined settlement boundaries, would be contrary to the adopted Development Plan in principle. However, Section 38(6) of the 2004 Act provides for a determination other than in accordance with a development plan if material considerations indicate it is appropriate.
- 6.1.8 The relevant material considerations in this case are:
- The relevant housing supply policies of the Havant Borough Core Strategy and Local Plan Allocations, including policies CS17 and AL2, are planning to meet a level of housing need from a different era and are now falling some way short of delivering a sufficient supply of homes to meet Havant's full, up-to-date housing needs.
 - The extent of the authority's urban areas must now inevitably change in order to accommodate more recent, and higher, up-to-date evidence of Havant's housing needs, as acknowledged through the proposal to allocate additional greenfield housing sites beyond the current urban limits in the Council's emerging Local Plan.
 - The Council are currently unable to demonstrate a five-year housing land supply, rendering the most important policies for determining the application (including CS17 and AL2) out-of-date for the purposes of decision making on this basis alone.
 - The application falls to be determined in accordance with the tilted planning balance provided by the Presumption in Favour of Sustainable Development.
 - As described in this Planning Statement, there are no adverse impacts that would significantly and demonstrably outweigh the benefits of granting planning permission in this case. It has also been demonstrated that the

application proposals would not give rise to any remaining adverse effects on the integrity of European Sites after the implementation of appropriate mitigation.

- The application proposals would align the aspirations and strategy of the Council's emerging Local Plan, which has identified the application site as a suitable and sustainable location for further residential development.
- The site is suitable for residential development in terms of location and characteristics and it is not of high environmental value. Any landscape harm would not be significant, and net biodiversity gains can be readily achieved
- The provision of affordable housing, without subsidy, is a significant benefit in circumstances where the Council is not delivering sufficient affordable homes to meet pressing needs.

6.2 Benefits

6.2.1 The table below highlights some of the key benefits arising in respect of the application proposal:

Market Housing	It will help to deliver much needed new, quality, family homes, in a community where people wish to live, in a suitable and sustainable location close to existing public transport, shops, employment opportunities and community services.
Affordable Housing	It will provide a wide range of homes including a policy-compliant provision of affordable housing (30% or up to 90 units) in an area where there is an existing unmet need unlikely to be delivered through alternative means.
Jobs and the Economy	Immediate Impacts The build cost for the development is expected to be around £39.2m. Calculations suggest that this construction expenditure would support around 335 Full Time Equivalent (FTE) construction jobs over the period of the build. The development of new homes in the proposed development could help to address local unemployment in the industry, and provide apprenticeship and training opportunities for young unemployed people.

	Following the completion of the development, Havant Borough Council will benefit from circa £1.5m via the New Homes Bonus. Lasting Impacts It is anticipated that 406 of residents from the new development will of working age and in employment. Household expenditure from the 300 new homes would be circa £10 million per year. The scheme will supply new affordable rented and intermediate housing, helping to address substantial local affordable housing needs by providing opportunities for lower income households to own their own home or to secure rented accommodation.
Protecting and enhancing Vitality and Viability	The new residents will increase demand for and use of local services and businesses and increased spending will help to protect, maintain and enhance the services available and accessible within the town and surrounding area.
Public Open Space and Recreation	It will provide formal and informal public open space and green infrastructure and secure its long-term management for use by the new and existing community. It will improve connectivity and access to public rights of way.
Environmental Benefits	Biodiversity of the site will be protected, diversified and improved through new hedgerow and tree planting and delivery of new garden spaces and formal and informal green spaces. Overall, the proposal will achieve a net gain in biodiversity.

6.3 Harm

- 6.3.1 The supporting material, assessments and reports demonstrate that there are no unacceptable adverse impacts associated with the scheme.
- 6.3.2 As with any greenfield site, the development will introduce changes to the area and some urbanising effects and it will involve the loss of some agricultural land however, this is to be expected and the LVA demonstrates the scheme can be delivered without unacceptable wider landscape and visual impacts.

6.3.3 As described above, any impact on the significance of the Grade II* Listed Church of St Mary arising from the application proposals would be limited and fall within the category of less than substantial harm. This level of less substantial harm is considered to be outweighed by the benefits arising from the application proposals.

6.3.4 Despite these changes, significant and demonstrable harm will not arise through development overall as proposed.

6.4 Planning Balance and Conclusions

6.4.1 The Framework policies on the delivery of sustainable housing development carry significant weight, and the delivery of the proposed development would support housing and economic development objectives and meet the aims and objectives of sustainable development, securing net gains across all three strands of sustainable development (economic, social and environmental).

6.4.2 There are no technical or environmental impacts that would significantly or demonstrably outweigh the substantial benefits of the proposal and specific policies of the Framework and Development Plan do not indicate that development should be restricted.

6.4.3 In accordance with paragraph 11 of the Framework, the development proposal clearly constitutes 'sustainable development'.

6.4.4 Accordingly, it is clear there are significant material considerations which outweigh the statutory presumption in favour of the Havant Borough Development Plan and the planning application should be approved



www.gladman.co.uk

Gladman House
Alexandria Way
Congleton, Cheshire
CW12 1LB