

Cabbagefield Row, Havant

Planning Statement

A118140

Prepared on behalf of Portsmouth City Council

August 2021

Document control

Document:	Planning Statement	
Project:	Cabbagefield Row, Havant	
Client:	Portsmouth City Council	
Job Number:	HP21001 - B021786	
Revision:		
Date:	August 2021	
Prepared by: Ed Allsop	Checked by: Nick Billington	Approved By: Nick Billington

CONTENTS

Contents.....

1. Introduction1

2. The Site and locality2

3. Planning History.....3

4. The application Proposals5

5. Planning Policy context.....6

6. Policy H23 Cabbagefield Row21

7. Key Planning Considerations24

8. Summary and conclusion32

1. Introduction

1.1 Tetra Tech Planning has been instructed by the applicant, Portsmouth City Council (PCC), to prepare a Planning Statement to support an outline planning application to Havant Borough Council (HBC). Outline planning permission is sought for the creation of 150 units (100% affordable housing) with layout, scale and access, including biodiversity enhancements and buffers and species-specific enhancements, SUDS, car parking and public open space.

1.2 The planning statement analyses the application site and surrounding area and sets out the planning history and planning policy context. The statement demonstrates why the proposed development is appropriate in relation to key planning policy, technical and environmental considerations. More specifically, the planning statement will demonstrate compliance with the draft allocation policy H34 for the site and how the development provides many benefits, notably providing much needed affordable housing (100%) in the context of the Council not being able to demonstrate a 5 year housing land supply.

1.3 Please refer to the supporting cover letter which provides a list of reports and plans which form this submission.

2. The Site and locality

2.1 The site is located within the jurisdiction of Havant Borough Council but is owned and managed by Portsmouth City Council. The site is located to the north of Leigh Park, in a highly sustainable location and is a draft allocation in the emerging Local Plan under policy H34 for around 150-155 units. The total site area is 7.2ha. and consists of grassland and scrub, bordered on three sides by woodland. Immediately south of the site is Swanmore Road which forms the northern edge of primarily residential area of Leigh Park. The site can be identified on the accompanying site location plan.

2.2 Further north and east from the site is woodland and grassland associated with Havant Thicket and Staunton Country Park. The recently approved Havant Thicket Reservoir is located in close proximity to the site. To the west, the A3(M) road corridor passes approximately 700 metres away in a north south direction, and to the west of this road is the town of Waterlooville. The town of Havant is further to the south of the site.

2.3 The application site has no overriding constraints, being located outside of the Conservation Area and located in Flood Zone 1, the lowest risk of flooding. Please refer to the submitted Design and Access Statement prepared by PDP Architecture for a more detailed analysis of the site context and locality.

3. Planning History

3.1 There is no directly relevant planning application history on the site, although extensive work has been undertaken in the past to support the allocation of the site.

Pre-Application Advice request

3.2 A Pre-Application Advice request was submitted to the Council for the proposals in June 2019. The pre-app acted in part as a capacity study to demonstrate that the site was capable of accommodating the indicated number of dwellings from policy H34 whilst not developing in the northern area of the site. The Council's response was received in October 2019 and was made in relation to the emerging local plan policies, rather than the policies of the adopted plan.

3.3 The pre-application response from HBC was largely supportive, however the scheme has undergone a number of changes through the design evolution process since the initial pre-application process to take into account the comments received and the housing requirements of PCC and HBC. This is evidenced through the design and layout of the proposals. A more detailed analysis of the design evolution can be seen in the Design and Access Statement.

EIA screening letter

3.4 A screening letter was submitted to Havant Borough Council in July 2021. The scheme is not considered to have the ability to have significant environmental impact. The letter concluded that the scheme is not an EIA development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') and no Environmental Statement is required to accompany the planning application. A number of technical reports have been submitted alongside this planning application on matters relating to ecology, noise, air quality, trees, archaeology, flooding, landscape, transport and sustainability.

tetratecheurope.com

3.5 It is fully acknowledged that there will be environmental effects; these are being surveyed and assessed and addressed by design and specific mitigation measures which conclude that the environmental effects will be minimal. At this time, we are still awaiting a response from the Council.

Havant Thicket Reservoir application

3.6 Havant Borough and East Hampshire District Council's Planning Committees resolved to grant planning permission for the recent planning application at Havant Thicket Reservoir adjacent to the application site in Summer 2021. These works include plans for an 8.7 billion litre storage reservoir spanning 160 hectares. The reservoir, once complete will create a permanent wetland with bird watching facilities.

4. The application Proposals

Description of development: Outline planning application for the creation of 150 dwellings with 100% affordable housing, with layout, scale and access, including biodiversity enhancements and buffers and species-specific enhancements, SUDS, car parking and public open space.

4.1 Havant Borough Council are unable to demonstrate a 5 year housing land supply and the site is a draft allocation in the emerging local plan under policy H34 for around 150-155 units. The proposals present an excellent opportunity to achieve the Council's strategic housing objectives, including the delivery of acutely needed affordable housing, through the delivery of this site.

4.2 There has been a historic under supply of affordable housing, therefore the proposals are very important for both Portsmouth City Council and Havant Borough Council. Portsmouth City Council have commissioned this 100% affordable scheme at Cabbagefield Row site to meet demand from both Havant Borough Council (HBC) and Portsmouth City Council housing waiting lists. There are over 1500 applications on the HBC waiting list and of the 1500 people on PCC's waiting list, over 800 will accept a home in the Warren area of Havant.

4.3 The outline planning application seeks the approval of access, layout and scale. All other matters are to be reserved.

4.4 The proposed development of this site will:

- Provide much needed housing, including 100% affordable
- Ecological and biodiversity enhancements on site
- An attractive large area of public open space
- Sustainable drainage systems and low carbon design
- Pedestrian and cycle links

tetratecheurope.com

5. Planning Policy context

5.1 This section sets out the key relevant planning policy at national and local levels, section 8 sets out how the proposals accord with these policies. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, in the determination of planning applications, decisions are made in accordance with the Development Plan unless material considerations indicate otherwise. This section will firstly note the national policies of relevance before focusing on the local policies considered of most relevance to the consideration of the proposals for the site. Section 7 will then discuss the principle of development, as it relates to the relevant policies and why the scheme is considered acceptable when taking account of the adopted plan as a whole and material planning considerations.

National Planning Policy Framework and Guidance

National Planning Policy Framework

5.2 The most recent National Planning Policy Framework (NPPF) was published in February 2019 and revised in July 2021 and establishes a presumption in favour of sustainable development. Paragraph 2 states that the NPPF is a material consideration in planning decisions.

5.3 Paragraph 8 confirms that there are three dimensions to sustainable development – economic (building a strong, competitive economy); social (providing the supply of housing required to meet needs and creating a high quality-built environment); and environmental (protecting and enhancing the natural, built and historic environment).

5.4 Paragraph 9 confirms that these roles should be delivered through the preparation and implementation of plans and the application of policies but also taking into account local circumstances to reflect the need and opportunities in each area.

5.5 Paragraph 11 stresses that plans and decisions should apply a presumption in favour of sustainable development. Development plans should positively seek opportunities to meet the development needs of the area, and proposals should accord with an up-to date development plan. The NPPF states that for decision making, this means approving development proposals without delay. Footnote 8 goes on to note that this includes applications involving the provision of housing in situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites.

5.6 In terms of determining applications, paragraph 38 sets out that it is a requirement that local Planning Authorities should approach decisions in a positive and creative way. This paragraph also states that Planning Authorities should work proactively with applicants to ensure that developments will improve the economic, social and environmental conditions, whilst seeking to approve applications for sustainable development where possible.

5.7 Paragraph 20 relates to strategic policies where it is set out that these policies should make sufficient provision for: Housing (including affordable housing), employment, commercial development and infrastructure.

5.8 Paragraph 47 states that planning law requires applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise, including whether the policies of the local plan are up-to-date. It encourages that decisions on applications should be made as quickly as possible.

5.9 Paragraph 54 of the NPPF states that conditions can be used to make a development acceptable, where it might otherwise be unacceptable, however, these should be kept to a minimum and only imposed if necessary.

5.10 Section 5 on housing sets out that the Government is committed to 'significantly boosting the supply of homes (paragraph 60)' in order to meet local needs and help make sure that land with permission is developed without unnecessary delay. This includes the provision of new affordable housing on large sites to meet local needs.

5.11 Section 8 relates to promoting healthy communities and states that planning decisions should plan positively for the provision and use of shared space, community facilities and other local services to enhance the sustainability of communities and residential environments.

5.12 This means where sites have good access to existing public transport, such as busses, railway stations and the strategic road network, new development should be considered which maximises these opportunities. It states that proposals should facilitate access to high quality public transport.

5.13 Section 11 relates to making the most effective use of land to make sure that decisions meet the need for housing as effectively as possible whilst improving the environment and making safe and healthy communities.

5.14 Paragraph 130 states that decisions should ensure that developments add to the overall quality of the area and should be visually attractive through good architecture, layout and appropriate and effective landscaping. New development needs to respect local character and establish a sense of place through streets, spaces and materials.

5.15 Paragraph 132 states that design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests.

5.16 Paragraph 157 emphasises that local authorities should expect new development to comply with local policies for energy and for the built form to take into account layout, building orientation and landscaping to minimise energy consumption.

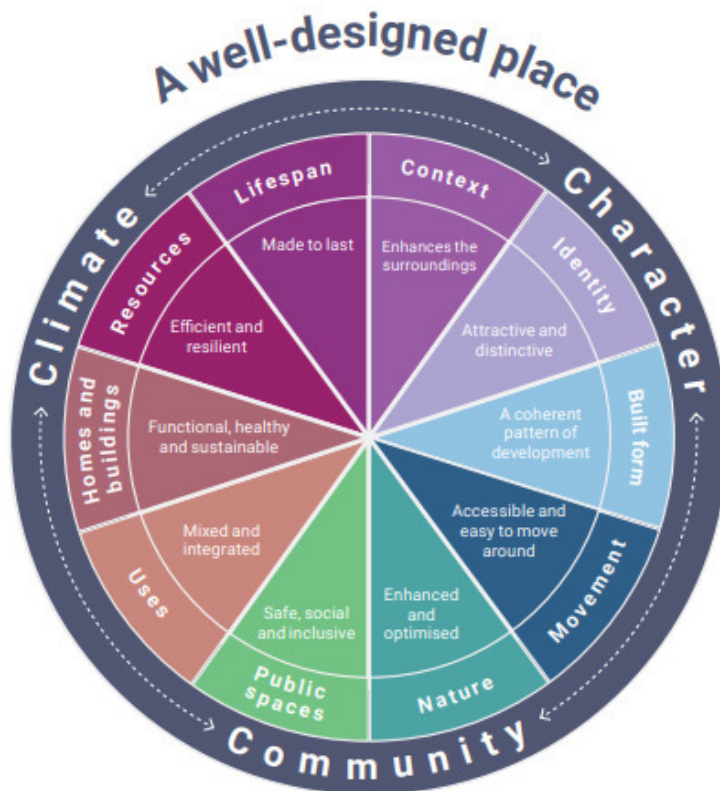
5.17 Paragraph 158 states that where renewable and low carbon development is proposed, the local authority should not require applicants to demonstrate the overall need for renewable or low carbon energy and recognise that even a small-scale project can provide a valuable contribution to reducing greenhouse gas emissions. The NPPF goes on to state that these types of applications should be approved.

5.18 Paragraph 174 notes that planning policies and decisions should contribute to and enhance the natural local environment. It provides 6 criteria which relate to protection and enhancement, recognition of ecological value, minimising impacts on and providing net gains for biodiversity and that new development should help improve local environmental conditions. This paragraph also states that mitigation can be used where appropriate.

5.19 Paragraph 180 states that when determining planning applications, local authorities should consider the following: whether there is a significant harm to biodiversity resulting from the development which can't be mitigated and avoiding adverse harm to a SSSI. This paragraph states that development which conserves and enhances biodiversity should be supported and that measures can be put in place to enhance public access to nature.

National Design Guide (2019)

5.20 In October 2019 the Government published the National Design Guide (NDG) which sets out the Government's commitment to achieving better design and a framework for how this will be achieved. Underpinning the guidance are ten 'characteristics of a well-designed place'. These are illustrated as follows:



[tetratetechnology.com](https://www.tetratetechnology.com)

5.21 The NDG goes on to highlight how these characteristics could be incorporated into development in practice.

National Model Design Code (2021)

5.22 The purpose of the National Model Design Code is to provide detailed guidance on the production of design codes, guides and policies to promote successful design. It expands on the ten characteristics of good design set out in the National Design Guide, which reflects the government's priorities and provides a common overarching framework for design. The National Model Design Code forms part of the government's planning practice guidance and should be read as part of the National Design Guide, and alongside the planning practice guidance notes referenced in Part 3 of the National Design Guide, Manual for Streets, and other forthcoming guidance relating to the natural and environmental characteristics of development. This guidance is not a statement of national policy, however, the government recommends that the advice in this guidance on how to prepare design codes and guides is to be followed.

National Planning Policy Guidance (NPPG)

5.23 Planning Practice Guidance (PPG) was published online in March 2014, with periodic updates occurring as national policy is changed or refined. It advises that:

"The National Planning Policy Framework represents up-to-date Government planning policy and must be taken into account where it is relevant to a planning application or appeal. If decision takers choose not to follow the National Planning Policy Framework, clear and convincing reasons for doing so are needed. A development that is consistent with the National Planning Policy Framework does not remove the requirement to determine the application in accordance with the development plan unless there are other material considerations that indicate otherwise"

5.24 The Guidance advises that the statutory development plan is "the plan for the future development of an area" It consists of:

Local plans: development plan documents adopted by local planning authorities, including any 'saved' policies from plans that are otherwise no longer current, and those development plan documents that deal specifically with minerals and waste.

tetratecheurope.com

Neighbourhood plans: where these have been supported by the local community at referendum and subsequently made by the local planning authority.

Local Planning Policy

5.25 The application site falls within the jurisdiction of the Havant Borough Council (HBC) where the development plan comprises of the Local Plan (Core Strategy) adopted March 2011 and Local Plan (Allocations) July 2014. HBC have also adopted a number of separate Supplementary Planning Documents (SPD) which are a material consideration in the determination of this application.

Emerging Local Plan

5.26 HBC commenced work on the new Local Plan (2036) in 2016, the Pre-Submission Local Plan 2036 was approved by the Full Council on 30th January 2019. The emerging plan recently underwent examination by the secretary of state in July 2021. However, the plan has not yet been adopted and therefore it still has limited weight at this time in accordance with paragraph 50 of the NPPF.

Havant Borough Core Strategy- March 2011

5.27 The following local policies are considered of most relevance to the proposed development:

- Policy CS1- Health and Wellbeing
- Policy CS8- Community safety
- Policy CS9- Housing
- Policy CS14- Efficient use of resources
- Policy CS15- Flood and erosion risk
- Policy CS16- High Quality design
- Policy CS17- Concentration and distribution of development within urban areas
- Policy CS18- Strategic site delivery
- 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 DM13- Car and cycle parking on residential development
- Policy DM18 Protecting New Development from Pollution

tetratecheurope.com

5.28 Policy CS1 sets out how the council will take a positive approach towards developments that seek to retain, enhance and create open spaces, with particular regard given towards the aim of improving access to community facilities.

5.29 Policy CS8 aims to protect community inhabitants through the promotion of community safety and good design that maximises opportunities for natural surveillance.

5.30 Local Plan Policy CS9 confirms the number of houses required in the period 2011-2026 is 6,300. This policy aims to achieve appropriate densities and to respect the surrounding landscape and character. This policy also aims to provide a mix of dwelling types which help meet identified local housing need.

5.31 Policy CS14 emphasis HBC's commitment to reducing greenhouse gases, stating that permission will be granted for development that ensures that onsite renewables and resource efficiency is maximised. This policy also states that residential development must also be of level 3 of the Code for Sustainable Homes, but it is important to note that this is now withdrawn.

5.32 Policy CS15 outlines that all developments will be required to ensure that there is no net increase in surface water run-off. To achieve this, priority should be given to incorporating Sustainable Drainage Systems (SuDS), the policy emphasises that arrangements should be in place for their management and maintenance.

5.33 Policy CS16 reinforces HBC's support for high quality design for all new developments which should be based on a clear understanding of the sites context. Policy CS16 goes on to list 7 features which the developments design should demonstrate:

1. Respond to, draws inspiration from and respects local context
2. Produces a positive relationship between buildings, street and spaces both existing and proposed
3. Contributions to the improvement of the public realm close to the development
4. Inclusive by considering the needs of those with disabilities, ensuring safe and convenient access for all; and integrating affordable and supported housing with market housing through tenure blind design to minimise social exclusion and remote social integration

tetratecheurope.com

5. Maximise opportunities for mixed use developments
6. Mitigates negative environmental impacts, through sustainable design and construction methods, resource efficiencies, particularly water and the facilities for waste recycling
7. Adapts to the changing needs of the users and the changing climate over the lifespan of the building

5.34 Policy CS17 states that development that makes effective use of land will be supported.

5.35 Policy CS18 seeks to promote development within the identified strategic sites. In doing so the council will take a positive approach towards developments located within these locations, permitting development which accords with the development plan policies.

5.36 Policy CS19 seeks to achieve the appropriate infrastructure needed to support new development. In doing so it aims to safeguard the existing and promote its use through a multifunctional approach. Development proposals will be expected to submit a programme of delivery of improved/new infrastructure needs to be agreed by the council.

5.37 Policy CS20 sets out a number of transport related requirements which aim to manage the increased demand for travel and re-balance travel towards non-car modes of transport. The policy aims to ensure that new development does not adversely increase congestion and that new development does not have a negative impact on road operation and or safety.

5.38 Policy CS21 states that for development to be acceptable it must show that appropriate infrastructure either exists or can be provided to support development. Where new or improved infrastructure is essential the council will require on-site or off-site provision through planning obligations, agreements or tariffs, in accordance with the relevant legislation for off-site provision.

5.39 Policy DM8 reinforces the council's goal of protecting and enhancing existing natural features. Development is required to protect and enhance local habitats and landscape distinctiveness. Development is also expected to address all the relevant criteriums stated below:

tetratecheurope.com

1. Protects natural features of nature conservation and/or amenity importance on the site
2. Sympathetically incorporates existing features into the overall design of the scheme
3. Provide new landscape works that integrate successfully with the local environment and existing natural features
4. Ensures sequences of greenspace are maintained, protected and contribute to the identity of the borough

5.40 Policy DM13 notes that residential development will be required to contribute towards the provision of car parking and cycle storage in accordance with the standards set out in the residential car parking and cycle provision supplementary planning document.

Havant emerging local plan (2036)

5.41 The following policies from the emerging local plan were referred to within the pre-application response:

- IN1 Effective provision of infrastructure
- IN2 Improving transport infrastructure
- IN3 Transport and parking in new development
- IN4 Access onto Classified Roads
- IN5 Further Management and Management Plans

- E1 High quality design
- E2 Health and wellbeing
- E3 Landscape and settlement boundaries
- E8 Open space, food growing
- E9 Provision of public open space in new development
- E12 Low carbon design
- E14 The Local Ecological Network
- E15 Protected species
- E16 Solent Special Protection Areas
- E18 Trees, hedgerows and woodland
- E19 Managing flood risk in new development
- E21 Drainage infrastructure in new development
- E22 Aquifer Source Protection Zones
- E23 Amenity and pollution
- E24 Air quality*
- E24 Contamination*

*as titled in the pre-application response

- H1 High quality new homes
- H2 Affordable Housing
- H3 Housing density

tetratecheurope.com

- H4 Housing mix
- H34 Cabbagefield Row
- DR2 - Regeneration

5.42 Policy IN1 reinforces the Council's commitment and aim to deliver key items of infrastructure needed to support future development within the borough. Developers will be expected to make a financial contribution towards infrastructure where appropriate. Planning permission will be granted where it does not compromise the prospect of delivery of this infrastructure.

5.43 Policy IN2 states that the principle of development will be supported for transport and land use proposals which:

1. Improve accessibility to goods, services and employment for all and provide transport options that promote equality
2. Improve the network of infrastructure which encourages sustainable, low carbon transport modes, with an emphasis on healthy non-motorised modes and public transport
3. Provide transport management measures to ensure the safe and efficient operation of the strategic and local road network
4. Prioritise transport improvements that support economic growth

5.44 Policy IN3 aims to ensure new development is acceptable from a transport and parking perspective. In doing so development proposals should be designed so that they are safe and suitable to access. Policy IN3 also notes that developments are expected to carefully consider traffic and transport implications. This includes, sufficient visibility and lighting to be provided for the roads, cycle and walking routes and car parks. Cycle and pedestrian routes are to be well connected and link with the wider network beyond the site.

5.45 Policy IN4 states that developments that utilise access onto classified roads or increase use of existing access will only be granted permission if vehicles can enter and leave in forward gear.

5.46 Policy IN5 sets out the councils' expectations towards the management and maintenance of 'common parts'. This includes SUDS, roads, paths, landscaping and public open space. When granting permission, a legal agreement will be provided through either an in-perpetuity

tetratecheurope.com

maintenance payment or the whole life management and maintenance of the common parts, establishing a management company.

5.47 Policy E1 notes that developments that are designed to a high standard, identify and respect surrounding locality and create a sense of place will be granted permission. In addition to this, developments that are well connected through integrating and linking exiting pedestrian and cycle routes will also be favoured. This policy also aims to ensure an acceptable impact of development on neighbouring occupiers. For larger developments, the policy encourages a variety of design styles and types to create interest.

5.48 Policy E2 outlines the importance of health and wellbeing through the provision of an accessible and well-designed place, promoting and enhancing the public realm with high-quality landscaping and street furniture.

5.49 Policy E3 relates to the positive contribution towards the sites landscape setting. It states that planning permission will be granted for development which:

1. Contributes positively to local identity and distinctiveness of landscapes and settlements
2. Respects, complements and integrates successfully with the local landscape surrounding the site;
3. Incorporates any key landmarks and natural or historic features on the site into the design of the scheme and protects them from destruction or deterioration;
4. protects key views of important landmarks and landscapes; and Integrates successfully with the local landscape surrounding the site.

5.50 Policy E8 relates to the Council's aims of protecting existing open spaces. Those protected are shown on the policies map. Development which enhances or retains the recreational value of the open space will be permitted. Development for recreational purpose will only be permitted if it can be demonstrated that development is in the public interest and that alternative open space provision can be provided.

5.51 Policy E9 requires new housing developments to consider the provision of public open space. New developments are required to meet the standards outlined by policy E9. Proposals of 50 dwellings or more will be permitted where:

1. High quality on-site public open space is provided to a standard of 1.5 ha per 1,000 population

tetratecheurope.com

2. On development where the open space requirement exceeds 0.5ha, an element of play space is provided
3. On greenfield sites, part of this requirement is provided in the form of community food growing space, to a standard of at least 0.2ha per 1,000 population

5.52 Policy E12 provides supporting guidance in relation to the efficient use of resources and low carbon design. It lists a set of criteria which new development is expected to meet. This includes minimising greenhouse gas emissions and improving the energy efficiency of buildings. New residential development is expected to result in a reduction in CO2 emissions of at least 19% of the Dwelling Emission Rate (DER) compared to the target emission rate of part L of the building regs. There is also a requirement to demonstrate an assessment under BREEAM communities scheme for developments of over 100 dwellings or more

5.53 Policy E14 notes that all new development is expected to protect and conserve the local Ecological Network. New development is expected to achieve biodiversity net gain, avoid fragmentation of the local ecological network and to assess ecological value of the site and prepare mitigation as appropriate.

5.54 Policy E15 relates to development proposals that are likely to affect protected species and/or their supporting habitats. Developments should avoid impacting upon the identified species. If this is not possible proposals should mitigate and compensate. A set of criteria of which the development should adhere to is listed.

5.55 Policy E16 states that planning permission will be granted for new dwellings that mitigate the likely significant effect on the Solent European Sites. This mitigation can be through a financial contribution for the Solent Recreation Mitigation Strategy or on site mitigation features. In some instances, it may be a combination of both.

5.56 Policy E18 aims to ensure the impact of development on trees, hedgerows and woodlands is acceptable. New development will need to reflect or enhance existing landscape and protect existing trees during the construction process. The Council will not support development which results in harm to important trees and woodland, unless there are benefits that outweigh the impact of development.

tetratecheurope.com

5.57 Policy E19 requires new development to consider the impact of flood risk. It details that developments should have no net increase in surface water run-off and that SUDS should be incorporated into the scheme.

5.58 Policy E20 aims to achieve greenfield run-off rates and to implement drainage systems that do not increase flood risk elsewhere. This policy also requires sewerage infrastructure to be considered in the site layout.

5.59 Policy E21 states that proposals for non-householder development in the Aquifer Source Protection Zone will be permitted where the outlined risks are taken into account at an early stage. These include contaminated land, piling and foundation design and the importation and use of soils.

5.60 Policy E22 notes that development proposals will be permitted where projected levels of noise, odour, vibration, light, water or air pollution do not have a significant impact upon the amenity of existing and future users or/and measures are provided for the suitable mitigation of the above.

5.61 Policy E23 relates to the council's aim to ensure that air quality is a key consideration of development. It states that major developments will be expected to provide mitigation measures to offset emissions.

5.62 Policy E24 states that developments on sites likely to be affected by contamination will be permitted where there is no identified risk from land contamination or an appropriate risk assessment accounts for potential sources of contamination both on and off site

5.63 Policy H1 expects new residential development to be of a high quality. The policy notes that new homes should meet internal space standards, provide sufficient amenity space and ensure that 2% of dwellings are wheelchair accessible.

5.64 Policy H2 states that residential developments of 10 or more dwellings will be expected to provide a 30% affordable housing contribution if the site is located outside of Havant, Waterlooville and Leigh Park town centres. Sites located within the above locations is expected to provide a 20% contribution.

tetratecheurope.com

5.65 Policy H3 notes that residential development must maximise its contribution to the identified local housing need. The policy outlines what level of density is considered appropriate depending on its' location. In the Leigh Park area, development is expected to achieve a minimum of 70 dph (dwellings per hectare).

5.66 Policy H4 relates to housing mix and states that new development is expected to provide a range of dwelling type and size to meet local need. It goes on to state that 35% of the overall housing mix should be two bedroom homes, unless there is evidence that indicates an alternative approach can be taken.

5.67 Policy H34 allocates Cabbagefield Row for the residential development of approximately 155 dwellings. A full assessment of this policy is outlined in section 6 of this planning statement

5.68 Policy DR2 emphasises the Council's commitment to achieving the strategic priority of regeneration. The Council also support the development and intensification of brownfield sites. In addition to the above the Council is committed to the development of the following key projects.

1. Havant Town Centre (KP1)
2. Waterlooville Town Centre (KP2)
3. Hayling Island Seafront (KP3)
4. Leigh Park District Centre (KP4)

Borough Design Guide SPD (2011)

5.69 The SPD sets out the Council's design expectations for new development and supports policy CS16. It aims to guide new development so that it responds positively to the character and special qualities of the Borough. It provides details on massing, height, and site context and notes that new development should be of a sustainable design. The SPD also notes that an adequate level of external amenity space should be sought, but that this is not always achievable and is dependent of site context.

tetratecheurope.com

Housing SPD (2011)

5.70 This SPD states that the Council are required to deliver 6,300 homes within the Plan Period. It aims to meet housing need within the borough and details the expected level of affordable housing. It should be noted that since the SPD adopted, the Council are required to provide 11,250 between 2011-2036.

Other relevant Havant Borough Council Planning Documents

5.71 Finally, the following documents are also considered to be of relevance to the proposed development:

- HBC Parking (2016, partially updated 2019)

5.72 All of the national and local policies identified above have been carefully considered during the development of the proposals for this site. The following sections will demonstrate why, in consideration of these policies and other material considerations, the proposals that form this Planning Application submission should be supported.

6. Policy H34 Cabbagefield Row

6.1 This section provides a summary of how the proposals comply with the criteria of the allocation policy H34. Section 7 will then go into more detail on specific key considerations in relation to this and other relevant policies.

Criterion:	Assessment:	Compliance:
Sufficient information to be submitted to address the site-specific planning considerations. This will include:		
i) Archaeological Assessment	An Archaeological Desk Based Assessment has been provided by Wessex Archaeology. The report concludes that there are no definitive indications that any buried archaeological remains are present within the site.	
ii) Flood Risk Assessment	An FRA has been submitted which concludes that the site is at low risk from groundwater, surface water and sewer source flooding.	
iii) Drainage Strategy	The drainage strategy has followed a SUDS based strategy which will include onsite stormwater attenuation capacity. The proposed strategy will not increase flood risk elsewhere.	

tetratecheurope.com

iv) Transport Assessment and Travel Plan	This application is accompanied by a Transport Assessment which also includes a Travel Plan.	
v) LVIA	An LVIA has been prepared by Terra Firma and the proposals have been informed by the relevant landscape character assessments. The LVIA has assessed the landscape and visual receptors.	
vi) Contaminated Land Investigation Report	A land contamination report has been prepared by SOCOTEC. The report concludes that the risks posed by land contamination are low.	
vii) Air Quality Assessment	The application is accompanied by an Air Quality Assessment prepared by Syntegra which confirms there is no significant or harmful impacts.	
viii) Ecological Assessment	An Ecological Impact Assessment has been submitted.	
Appropriate mitigation measures, including buffers, are put in place for Bechstein's bats in line with Policy E15	Bat trapping and radio tracking surveys did not record Bechstein's bats making use of habitat in the vicinity of the site. A buffer to the woodland edges and built development in line with Policy E15 will be provided. Bat boxes are also being provided as mitigation.	
Design and layout:		
i) Provide access south onto Swanmore Road	The proposals will provide access at the southern end of the site onto Swanmore Road. Please refer to the submitted site layout plan.	

ii) Provide a multi-user (non-motorised) link to Havant Bridleway 121 and Calshot Road	A non-motorised link to Bridleway 121 is provided through the open space at the northern eastern corner of the site via a footpath. A separate non-motorised link to Swanmore/ Calshot Road is provided in the south/ south western edge of the site.	
iii) Retains and enhances the on-site SINC as an alternative to a new open space within the development	The proposals respect and enhance the SINC at the northern end of the site.	
iv) Retains and strengthens where possible the strong landscape boundary to the site	Development has been set back from the existing designated landscape features and the built area is sited away from the northern boundary and the SINC. The site layout has been landscape led with the boundary vegetation and planting being retained and strengthened.	
v) Retain and integrate existing trees and hedgerows	The proposals respect the existing trees and hedgerows on site.	
vi) Allows for attenuation of flood waters in SuDS designed to prevent flooding beyond the site	The drainage strategy has followed a SuDS based strategy which will include onsite stormwater attenuation capacity. The	

	proposed strategy will not increase flood risk elsewhere.	
--	---	--

6.2 To conclude, the proposals meet each criterion of policy H34 as evidenced in the table above. Please refer to each of the accompanying technical reports for more detail.

7. Key Planning Considerations

7.1 This section will demonstrate that the site provides many benefits and contributes to delivering many other adopted local and national policy objectives. Most importantly, the proposals will make a significant contribution to the housing shortfall, including the under delivery of affordable housing in both PCC and HBC and deliver the draft housing allocation H34.

Principle of development

7.2 The application site is a draft allocation in the emerging local plan under Policy H34. The site is allocated for 'about 150' new homes. The site will play an important part in delivering the Council's strategic housing objectives.

7.3 The Council do not have a 5 year housing land supply and therefore paragraph 11 and footnote 8 of the NPPF apply. This means that there is a presumption in favour of sustainable development and planning permission should be approved without delay. The delivery of this site would make an important and significant positive contribution to the Boroughs' housing requirements in a location that is highly sustainable. The proposals make an efficient use of land and the principle of development has been established and is acceptable under the provision of paragraph 11 of the NPPF. As demonstrated in section 6, each of the relevant allocation policy criteria for policy H34 have been complied with.

100% affordable housing

7.4 The outline proposals seek a 100% affordable housing scheme to address the under delivery and supply in the past. There are over 1500 applications on the HBC waiting list and of the 1500 people on PCC's waiting list, over 800 will accept a home in the Warren area of Havant. Since 2018, Portsmouth City Council (PCC) have developed a strong working relationship with HBC in relation to the delivery of affordable homes within the borough. PCC recognise HBC will receive 30% nominations for the properties developed and have therefore designed the scheme creating housing types that are right for both local authorities. Portsmouth City Council have commissioned a 100% affordable scheme at Cabbagefield Row site to meet demand from both Havant Borough Council (HBC) and Portsmouth City Council housing waiting lists.

7.5 It is accepted that the proposals present a conflict with 1 criterion of policy CS9 by providing more than the average 30-40% affordable housing. However, the development will achieve many of the other aspirations and objectives of policy CS9 through the provision of much needed on site affordable housing, a mixture of housing types and sizes, providing appropriate densities and meeting local need. All of these benefits are significant and hold great weight in the planning balance, particularly as the Council do not have a 5 year housing land supply. It is also not clear whether the Council have an affordable housing exception sites policy in either the adopted or emerging local plan. Notwithstanding this, the proposals enable the creation of mixed and balanced communities. The proposals have been designed to enable the opportunity for the development to integrate with the wider community through the creation of pedestrian and cycle links to bridleway 108/121/1 running along the northern site boundary, and bridleway 108/120/2 along the eastern boundary and also the creation of a large area of public open space. The design and layout would naturally invite people from the wider community and area to visit or pass through the site whilst connecting to the Public Right of Way and therefore create a development which naturally connects and shares experiences with the wider area. The built layout, design and orientation also responds positively to the surrounding built environment physically and visually which is important as the development will be seen and experienced within the context of the wider area and not in isolation. The homes will also be of a variety of sizes and types which in itself will accommodate for a range of future residents and therefore naturally attract a mixed community, from young families, couples and also those looking to downsize. There is also the potential for the 'right to buy'

tetratecheurope.com

scheme in time. Therefore, the 100% affordable housing is justified as it is informed by identified need, this should be seen as a significant benefit. It should also be noted that the proposals also respond positively to emerging affordable housing policy H2 which seeks new development to create a mixed and balanced community with a range, type and size of affordable housing which reflects the latest evidence of locally identified need.

Layout and scale

7.6 The scale of the development has been informed by the local character of the site, the topography and the constraints of the neighbouring woodland sites and the designated grasslands and SINC designations. The layout allows for connecting public realm, landscaping to the boundaries, landscape strips running east-west across the site and the retention of the open land at the northern end of the site. The layout and scale of development allows for the dwellings to meet the Nationally Described Space Standards as well as M4(2) and M4(3) provision. These dwellings are also afforded their own private external amenity and wider public amenity space to encourage a sense of place.

7.7 The proposed scale and layout also takes into account the accessible location of the site to public transport and local services. The chosen layout and scale of development respects the surrounding landscape, character and built form. The proposed storey heights result in an appropriate level of density for the site and also enable the aspirations of policy H34 (150-155 units) to be achieved whilst respecting the constraints of the site. The proposed layout and scale of development through its design will have a positive relationship between buildings, streets and spaces on site and achieve consistent building lines and views throughout the site. It is also considered that the proposed layout and scale would not result in an unacceptable impact on residential amenity through overbearing impact, overshadowing or overlooking. Therefore, the proposals comply with policies CS9, CS16 and CS18 of the adopted local plan and policies H1, H2, H3 H4, E1, E2 and H34 of the emerging local plan.

Highways and access

7.8 The site is accessed via Swanmore Road/ Calshot Road which at the southern end of the site as required by criterion ci of Policy H34. The access and other highways matters have been informed through pre-application discussions with Hampshire County Council. The required visibility splays have been achieved as per the HCC guidance and this is illustrated on appendix H of the submitted Transport Assessment. Although a detailed parking layout will be a reserved matter, the site layout has enabled the appropriate parameters to be created so that the parking standards can be accommodated. Modelling has been undertaken to assess the capacity of 5 junctions in close proximity to the site and the results conclude that the impact of the proposed development is acceptable. Please refer to the accompanying Transport Assessment for more detail.

7.9 The site currently provides paths and desire lines across the site towards the north-eastern corner where there is access to the bridleway which runs along the northern boundary of the site and through Havant thicket. The application will improve pedestrian connectivity and links through the routes shown on the proposed site layout plan. The development will enable and encourage sustainable modes of transport through the provision of and access to pedestrian and cycle links to the wider area. A Travel Plan is provided within the accompanying Transport Assessment.

7.10 Paragraph 111 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. The submission as a whole has demonstrated that the impact on highways operation and safety is acceptable and compliant with local and national policy. Therefore, the proposals comply with policy CS20 of the adopted local plan and policies IN3 and H34 of the emerging local plan.

Ecology

7.11 The proposals will provide ecological enhancements and mitigation on site and the proposals will provide opportunities for people to engage in activity and improve their health and well-being through the proposed open greenspace to the north of the site. A number of ecological enhancements and mitigation features are being used within the design of the proposed development and the proposals avoid the fragmentation of the local ecological network. The proposals include a 15m buffer adjacent to ancient woodlands and woodland buffers will be planted with dense vegetation to deter people accessing sensitive areas of woodland. The undeveloped nature of the north of the site though the open greenspace will mitigate for any significant increase in recreational pressure on other publicly accessible SINC's in the area. In relation to bats, key foraging and commuting habitats will be predominantly retrained and an appropriate external lighting strategy will be achieved to limit the disturbance to bats. Bat trapping and radio tracking surveys did not record Bechstein's bats making use of habitat in the vicinity of the site, however, notwithstanding this, 20% of units will host bat boxes or similar.

7.12 A number of detailed assessments and surveys have been undertaken as part of this application, this has identified the ecological base line of the site, please refer to the submitted ecological report for a full list. The approach taken responds positively to the requirements of policy E15 which requires surveys to be carried out where development could affect protected species and or their supporting habitats. A contribution will also be made to the Solent Recreation Mitigation Strategy. Therefore, the proposals comply with the aims and objectives of policy CS11 of the adopted local plan and policies E14, E15 and H34 of the emerging local plan.

Archaeology

7.13 The site has been subject to a desk top assessment which has reviewed the potential effects of the outline proposals on the significance of the buried archaeological resource. Baseline conditions were established through a desk-based review of publicly accessible sources of primary and synthesised information pertaining to the historic environment within a 1 km radial Study Area. The report submitted alongside this planning application prepared by

tetratecheurope.com

Wessex Archaeology concludes that there are no definitive indications that any buried archaeological remains are within the site.

Trees

7.14 The site has been subject to a full tree survey (BS5837:2012) and this has informed the Arboricultural impact assessment and method statements which support this planning application. No trees on site are subject to protection through TPO or a Conservation Area designation. The proposals retain a strong buffer around the site, trees that are to be removed are of limited amenity value or poor condition.

7.15 Therefore, the proposals comply with policies CS11, DM8 of the adopted local plan and policies E18 and H34 of the emerging local plan. Please refer to the submitted AIA and AMS prepared by Woodside Tree Consultancy for more detail.

Flood risk and drainage

7.16 The site is located in Flood Zone 1 (the lowest risk of flooding). The proposed development passes the Sequential Test with no requirement to pass the Exception Test. Flood hazard analysis has demonstrated that the development is also at low risk of flooding from groundwater, surface water or sewer sources. The proposed SUDS-based surface water drainage scheme would incorporate on-site stormwater attenuation capacity designed to ensure that off-site discharge of surface water would be restricted to current greenfield rates and the proposals do not increase flood risk elsewhere.

7.17 Therefore, the proposals comply with policy CS15 of the adopted local plan and policies E19, E20 and H34 of the emerging local plan.

Nitrates

7.18 On Wednesday 26 June 2019, Havant Borough Council's Cabinet approved the Position Statement on Nutrient Neutral Development. This puts in place mechanisms for development to achieve nutrient neutrality. It is understood that the mitigation scheme will serve the allocated and draft allocated sites, such as Cabbagefield Row. The proposals will make the relevant financial contribution to the scheme to off-set the impact of nitrates, this will be secured via S106 or Unilateral Undertaking.

7.19 The Position Statement sets out how development proposals should consider the issue. As part of the information needed to determine relevant planning applications, a European Site avoidance and mitigation checklist will be required. This has been submitted alongside this planning application. The Council also provide the Warblington Farm Mitigation Scheme. This is an off-site mitigation scheme where a financial contribution is agreed via a Unilateral Undertaking, this will be agreed throughout the application process and with further advice with the Council.

Environmental sustainability

7.20 The proposed housing will meet and exceed the standards of modern living, utilising the latest energy and sustainability technologies to provide comfortable dwellings which are highly efficient to run. An energy hierarchy has informed the energy strategy, this identifies the principles for guiding development to optimise environmental benefits. The proposals aim to include passive design measures, the efficient use of water and also have the potential for solar shading, mechanical ventilation with heat recovery, air source heat pumps, ground source heat pumps and solar panels.

7.21 The submitted BREEAM Communities score tracker prepared by Syntegra demonstrates an overview of progress to date and concludes that achievement of all currently targeted credits would result in a score of 60.8% exceeding the threshold score for 'very good'. The document demonstrates an assessment under BREEAM communities scheme for developments over 100 dwellings in compliance policy E12 of the emerging local plan.

tetratecheurope.com

7.22 The development will pursue a 19% CO2 reduction against the Part L baseline through energy efficient measures and low carbon technologies. However, this will be further detailed and considered at reserved matters stage. Therefore, the proposals comply with policy CS16 of the adopted local plan and policy E12 of the emerging local plan. Please refer to the submitted energy strategy report prepared by Syntegra for more detail.

Developer Contributions

7.23 The proposed development will provide to financial contributions in relation to the Solent Recreation Mitigation Strategy.

8. Summary and conclusion

8.1 Tetra Tech Planning has prepared this statement in support of the outline planning application for the creation of 150 dwellings, of which 100% will be affordable housing, with layout, scale and access, including biodiversity enhancements and buffers and species-specific enhancements, SUDS, car parking and public open space. This planning statement has demonstrated the principle of development is acceptable within both the built and policy context, but also in terms of the aforementioned local and national planning policies listed in section 5, particularly policy H34. The outline application has provided the framework for other relevant local plan policies relating to the reserved matters to be met at a later date.

8.2 The proposals positively respond to the economic, social and environmental strands of sustainability set out in the NPPF. In summary:

Social:

The proposals will provide 150 much needed affordable homes and help address the Council's 5 year housing land supply shortfall in a sustainable location, with access to a range of services and facilities in the local area. The proposals also provide pedestrian and cycle links to the wider area and a large area of public open space and a play area.

Economic:

The development will bring benefits to the local economy through providing jobs directly through the construction process and the various strands extending from this. Additionally, the development will increase pedestrian footfall into the local shops, services and facilities which will bring financial benefits to the vitality and viability of the surrounding area.

Environmental:

The application proposals provide ecological enhancements on site, including a designated area at the northern end of the site. Existing hedgerows and trees will also be retained where appropriate and mitigation measures will be put in place. A financial contribution will also be made to the Bird Aware Solent Strategy to mitigate recreational pressure on the Solent Maritime sites.

tetratecheurope.com

8.3 Overall, the proposed development will provide 150 much needed new affordable homes, meeting the Council's strategic housing objective through the delivery of Policy H34 (Cabbagefield Row) which also responds positively to Policy CS18. It has been demonstrated how the proposals will be able to achieve the requirements of policy H34 itself, but also many other local plan objectives.

8.4 Most importantly, the Council do not have a five year housing land supply and the Council have confirmed that they will not be able to demonstrate a five year housing land supply upon adoption of the new local plan. Paragraph 11 and footnote 8 are engaged and the Council are expected to approve the planning application without delay. Therefore, the outline proposals provide a great opportunity to help address the housing shortfall through the delivery of a draft allocation without any adverse side effects. The Council should be aware of the weight paragraph 11 of the NPPF has and how this applies in the determination of this Outline Planning Application. The presumption in favour of sustainable development applies and the submission and accompanying technical reports have detailed that there would not be any adverse impact that would significantly and demonstrably outweigh the many benefits the site provides. The proposals comply with the aims and objectives of the NPPF and stated Local Plan policies and should be supported.