

**TOWN AND COUNTRY PLANNING
ACT 1990 (AS AMENDED)**

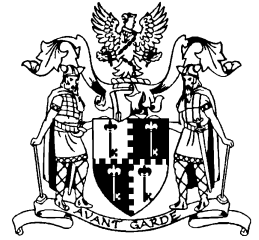
**STATEMENT OF
HAVANT BOROUGH COUNCIL**

**Land rear of and including The Coal Yard, 178A
West Street
HAVANT
PO9 1LR**

**Local Planning Authority Reference:
APP/16/00418**

**Planning Inspectorate Reference:
APP/X1735/W/16/3155488**

HAVANT BOROUGH COUNCIL



TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)

APPEAL BY MR PARRETT AGAINST THE DECISION OF HAVANT BOROUGH COUNCIL TO REFUSE TO GRANT OUTLINE PLANNING PERMISSION FOR THE CONSTRUCTION OF 9 DWELLINGS WITH ACCESS FROM WEST STREET FOLLOWING THE DEMOLITION OF 178A WEST STREET, HAVANT, PO9 1LR.

Planning Inspectorate Reference: APP/X1735/W/16/3155488

LPA REF: APP/16/00418

1.0 THE APPEAL SITE AND ITS SURROUNDINGS

- 1.1 178A West Street includes a small commercial unit which is currently being used as a hand car wash business. The site is located on the northern side of West Street adjacent to a car sales show room to the west and residential dwellings to the east, and lies opposite the junction with Meyrick Road to the south. The site is laid to hardstanding with a single storey unit, servicing as an office and lock up for the car wash, located to the rear of the site. The site is bounded by a solid brick wall to the east and brick wall with metal fence infill panels to the south and west. This section of the site was historically a coal yard.
- 1.2 The red line site subject of this application includes this commercial element and the land to the rear that is currently, under the land owners permission, being utilised as allotment land by the occupiers of the surrounding dwellings. The site extends from West Lane in the South up to the land owned by Network rail to the north. Much of the west half of the site is designated as a flood zone 2 and 3.

2.0 PLANNING HISTORY

98/56466/000 - Construction of single storey office building and replacement wall to south and west boundaries - Permit, 27/11/1998

08/56466/001 - Construction of single storey office building - Permit, 01/05/2008

08/56466/002 - Discharge of Condition No. 2 of Planning Permission 08/56466/001 - Permit, 19/08/2008

APP/12/00341 - Change of use to allow hand car wash business. (retrospective) - Permit, 24/05/2012

APP/12/00374 - Display of 4No non-illuminated advertisements consisting of 1No banner and 3No. fascia signs -Permit, 24/05/2012

APP/12/00935 - Retrospective application for change of use to allow hand car wash business, including use of jet wash facility. (Revised application.) - Permit, 26/10/2012

3.0 THE APPLICATION

3.1 The application the subject of this appeal was made valid on 24 April 2016 and the application was refused under delegated powers on 20 June 2016 for the following reasons:

1. The site is a windfall site situated partially within a Flood Zone 2 with a single access point located within a Flood Zone 3 and the development proposed is classified by the Environment Agency as a More Vulnerable Use. The National Planning Policy Framework requires that the Local Planning Authority undertake a Sequential Test to steer development to areas with the lowest probability of flooding. It is considered that there are sequentially preferable sites within the Borough and that the Local Planning Authority can demonstrate a 5 year housing supply. Therefore, there is no overriding justification for the development of an additional dwelling within a Flood Zone 2 which would result in an unacceptable risk to life and property from tidal inundation. In particular it has not been demonstrated that:

(1) The proposed development has a safe means of access and/or egress in the event of flooding. Consequently, there would be an unacceptable risk to the health and safety of the occupants in a flood event; and

(2) The site is currently not defended to the appropriate standard, taking into account climate change over the lifetime of the development, and no provision is made in the application to improve the existing defences to the required standard.

As such, the proposal would be contrary to the provisions of the National Planning Policy Framework and Policy CS15 of the Havant Borough Local Plan (Core Strategy) 2011.

2. The applicant has not demonstrated that the access and internal servicing would not lead to demonstrable harm to the highway network in terms of highway safety and amenity. The proposal is therefore contrary to policies CS16, CS19, CS20, and DM13 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework 2012.

3. On the basis of the limited information available to the Local Planning Authority it has not been demonstrated by the applicant that the proposed development could be undertaken in a satisfactory manner without a harmful impact to protected species. The proposal is therefore contrary to policies CS11 and DM8 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework 2012.

note - The NPPF, Circular 06/2005 and Natural England Standing Advice on Protected Species, require that planning decisions are based on full, up-to-date ecological information and it is essential that all necessary survey, assessment and mitigation information is available to the LPA prior to determination of a planning application, particularly in the case of protected species, which are a material planning consideration. This will enable the LPA to determine the application on the basis of full knowledge about the ecological impacts of the proposal and to ensure that any impacts can and will be mitigated, and are acceptable.

4. Development of the site in the manner proposed would amount to over-development, in that it would give rise to unsatisfactory plot configuration and to a cramped and contrived layout. The proposal is therefore contrary to policy CS16 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework 2012.

5. The proposal, without completion of the appropriate binding arrangements to secure a contribution towards the Solent Recreation Mitigation Partnership, is contrary to the Council's Policy on contributions towards measures of mitigation adopted by the Local Planning Authority which seeks to ensure that the provision is made from new

development towards mitigating against increasing recreational pressure on the Solent SPA. It is therefore contrary to Policies CS11 and CS21 of the Havant Borough Local Plan (Core Strategy) 2011 and Policy DM24 of the Havant Borough Local Plan (Allocations) 2014 and the National Planning Policy Framework 2012.

- 3.2 The outline application sought the erection of 9 dwellings with access from West Street following demolition of 178a West Street. All matters were reserved except access and layout.

4.0 POLICY CONSIDERATIONS

- 4.1 The application has been determined against the National Planning Policy Framework and local planning policy. With regards to local planning policy, the application was determined against the relevant policies from the Havant Borough Local Plan (Core Strategy) 2011, which was adopted on 1 March 2011. The relevant Core Strategy policies are CS9, CS11, CS15, CS16, CS17, CS19, CS20, CS21, DM2, DM8, DM13 and DM24 and have been sent to the Inspectorate under separate cover.

- 4.2 Policy CS16 (High Quality Design), advises that development proposals would only be permitted where it can be demonstrated that they respect the local context and use characteristics of the locality to help inform the design of new development. Development proposals should avoid causing detrimental impact on the neighbouring and proposed properties. The Havant Core Strategy can be found at;
<http://www.havant.gov.uk/havant-11597>

- 4.3 The Borough Design Guide is a supplementary Planning Document to the Core Strategy and was adopted December 2011 which supports Core Strategy policy CS16. The Borough Design Guide can be found at;
<http://www.havant.gov.uk/supplementary-planning-documents-and-other-material-considerations/borough-design-guide>

The Borough Design Guide states that “character helps to define a place and helps distinguish one place from another place. It is much more than building styles and appearance. The character of an area is a combination of the function and level of activity of the place, its existing structures and features, including open space and trees, the surrounding context of the site and how these all relate to one another”.

- 4.4 Policy CS15 (Flood and Erosion Risk) requires that development in areas of risk of flooding now and in the future with only be permitted where it meets the sequential and exception test.
- 4.5 A further important policy consideration for this appeal submission is the Havant Borough Draft Local Plan Housing Statement. This Local Plan Housing Statement has been produced in light of the Objectively Assessed Housing Need Update and the South Hampshire Spatial Position Statement; both published by the Partnership for Urban South Hampshire (PUSH) on 7 June 2016 and is the first step in addressing the rising housing need through a review of the Local Plan.
- 4.6 On 1 August 2013, the Community Infrastructure Levy (CIL) was brought into force by Havant Borough Council. CIL income can be used to fund additional infrastructure required to support new development including roads, schools, green spaces and community facilities.

- 4.7 CIL represents a fundamental change from the current system of developer contributions through Section 106 (S106) planning obligations. While S106 will still be used for site specific measures required to make a development acceptable, the introduction of CIL means that the use of S106 will be limited.
- 4.8 The overall aim of these changes is to make the developer contributions system fairer, faster and more transparent than the previous system. It is intended to give developers more certainty over costs and give councils and communities more choice and flexibility in how to fund infrastructure. The CIL rates to be applied to development are set out in the Havant Borough Community Infrastructure Levy Charging Schedule (see Appendix B), which was adopted by the Council on the 20 February 2013. The Charging Schedule and supporting documentation can be found at: <http://www.havant.gov.uk/planning-policy-design/community-infrastructure-levy>
- 4.9 As such this scheme, which represents new residential development, may be liable for CIL at a rate of £80 per additional square metre. The CIL amount payable for this scheme is not possible to be determined at the stage as the application is outline only and the proposed level of floorspace is not known.
- 4.10 The National Planning Policy Framework (NPPF) was published on 27 March 2012 and the NPPF sets out the three dimensions to sustainable development: economic, social and environmental. It is considered that the dimension most pertinent to this planning refusal is environmental.
- 4.11 In respect of flooding paragraph 101 of the NPPF requires that Local Planning Authorities steer new development to areas with the lowest probability of flooding and that development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.

5.0 REPRESENTATIONS

- 5.1 The application which is the subject of this appeal was published in accordance with the Council's adopted publicity procedures, and 51 neighbour notification letters were sent. In addition a site notice was posted. 27 letters of representation were received by the Planning Authority.
A copy of the representation letters has previously been forwarded to the Planning Inspectorate. The contents of the letters were summarised in the officer report.

6.0 PLANNING CONSIDERATIONS

- 6.1 Having regard to the relevant policies of the Havant Borough Local Plan (Core Strategy) 2011, the NPPF and the reasons for refusal given in the Decision Notice dated 20 June 2016, it is considered that the main issues for considerations with regard to the refusal of this application are set out below.

- (i) Principle of development
- (ii) Appropriateness of design and effect on the streetscene;
- (iii) Effect on neighbouring properties and amenities of future occupants
- (iv) Highway Implications
- (v) Impact on trees and protected sites
- (vi) Flooding issues
- (vii) CIL and SRMP considerations

(i) Principle of development

- 6.2 The site is within an urban area as identified by the Havant Borough Local Plan; therefore the proposal is acceptable in principle provided it meets the development criteria as considered below. It is considered that the loss of the small hand car wash business is acceptable when taken into consideration against the provision of housing. The exiting use is sui generis and so the tests of Core Strategy policy DM2 do not need to be met.

(ii) Appropriateness of design and effect on streetscene

- 6.3 It is not considered that the submitted documentation fully established that the development proposed would accord with the established pattern of existing development. However, scale and appearance of the dwellings are matters reserved at this stage. Furthermore, the impact of the proposed development on the streetscene and the adjacent conservation area will be negligible as it is largely shielded by existing housing that is set to the west and south of the site.

(iii) Effect on neighbouring properties and the amenities of future occupants

- 6.4 There are sufficient distances of separation between the proposed dwellings 1 to 6 and the surrounding existing residential development so as not to create a harmful impact on the amenities of the occupiers of the dwellings to an unacceptably detrimental extent. However, proposed units 7-9 forms the closest relationship at 12m (approx) from the rear of dwellings within Staunton Road. If the western elevation of units 7 to 9 formed a blank elevation, and they were low in height, this distance of separation maybe acceptable. However, scale and appearance do not form part of this outline application.
- 6.5 The site is partly located within a flood zone 2 and 3 and this has necessitated a cramped and contrived form of development within the area to the east of the site that falls within a flood zone 1. The curved design of the terrace of dwellings results in a cramped rear amenity space available to units 5 and 6 and it is considered that the flood risk constraints of the site will impact negatively on the overall design approach for the built-form arrangement and parking areas. Provision for landscape appears as a left over 'remnant space and indeed it may not be possible to provide established planting within the area of the site subject to flooding. Amenity space, gardens, screen planting, pedestrian access and circulation must all contribute an attractive landscape setting for the proposed development however, theses area are heavily compromised through flood zone constraints.

(iv) Highway Implications

- 6.6 The Council's Development Engineer raised concern that the internal road layout is likely to suffer from commuter parking in this location. The Council's Traffic Management Team have commented that, in the event that the internal road is to be adopted, on street parking restrictions on this and in the near vicinity will need to be considered and a Traffic Regulation order undertaken both the internal roads and in the near vicinity. The Traffic Management Team request that provision is made for a sum no less than £3000 to be provided by the developer to be set aside to allow a TRO be processed within a three year period of the construction of the development.

- 6.7 The LPA's Development Engineers have advised that the proposed junction must have sightlines of 2.5 by 43 m and that this can only be achieved by a variation of the existing TRO. However the conformation of the proposed TRO could not be guaranteed.
- 6.8 The Development Engineer has also raised concerns that the illustrative layout does not clearly show that a delivery/service vehicle could turn on. It is therefore considered that the application does not accord with policies CS16, CS19, CS20, and DM13 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework 2012. The applicant has not demonstrated that the access and internal servicing would not lead to demonstrable harm to the highway network in terms of highway safety and amenity. It is not considered that these concerns can be considered adequately at reserved matters stage, as the applicant is seeking layout to be a matter to be determined at within this outline submission.

(v) Ecology

- 6.9 The application is not accompanied by any ecological information and the Council's Consultant Ecologist is concerned that there is potential for legally-protected species to occur. The agent to the application was advised that a Phase 1 ecological survey of the site should have been submitted and this should have included an assessment of the potential for the site to support protected species (to be provided by a qualified ecologist).
- 6.10 This information was not submitted and therefore it is considered that the application does not meet The NPPF, Circular 06/2005 and Natural England Standing Advice on Protected Species. These require that planning decisions are based on full, up-to-date ecological information and it is essential that all necessary survey, assessment and mitigation information is available to the LPA prior to determination, particularly in the case of protected species, which are a material planning consideration. This enables the LPA to determine the application on the basis of full knowledge about the ecological impacts of the proposal and to ensure that any impacts can and will be mitigated, and are acceptable.

(vi) Flooding issues

- 6.11 The site is located within a Flood zone 2 and 3 as identified on the Environment Agency flood zone map and the proposed development of an additional houses is classified as a More Vulnerable Use by the EA. Paragraph 101 of the NPPF requires that Local Planning Authorities steer new development to areas with the lowest probability of flooding and that development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. A sequential approach should be undertaken by the LPA in this regard to decision making. The advice contained within the EA's *Demonstrating the flood risk Sequential Test for Planning applications*, has been followed to this regard to test the planning application subject of this report.
- 6.12 The Sequential Test does not need to be applied for individual developments on sites which have been allocated in development plans through the Sequential Test, or for applications for minor development, (for example extension to existing dwellings), or change of use (except for a change of use to a caravan, camping or chalet site, or to a mobile home or park home site). However, the site subject of this report is categorised as a windfall site and the EA advise that, in the absence of a flood risk windfall policy it may be possible (where the data is sufficiently robust) for the LPA to apply the

Sequential Test taking into account reasonably available sites, historic windfall rates and their distribution across the district relative to Flood Zones. Where historic and future trends evidence indicate that housing need in the district through windfall can be met largely/entirely by development outside high flood risk areas, this may provide grounds for factoring this into the consideration of 'reasonably available alternative sites at the planning application stage.

- 6.13 With regard to identifying future housing sites to meet the housing need within the Borough, the LPA has produced and published a Draft Local Plan Housing Statement (July 2016). The Statement has been subject to a public consultation process and is due to be considered by Cabinet in December 2016. It has been produced in light of the Objectively Assessed Housing Need Update and the South Hampshire Spatial Position Statement, both published by the Partnership for Urban South Hampshire (PUSH) on 7 June 2016 and in light of the requirements of the National Planning Policy Framework (NPPF), most importantly the key requirement that Local Planning Authorities must boost significantly the supply of housing. In order to achieve this, the NPPF also requires Local Planning Authorities to keep Local Plans up-to-date and review them to respond flexibly to changing circumstances, in this case a change in the need for new homes.
- 6.14 The Local Plan Housing Statement sets out the direction of travel for the preparation of the new Havant Borough Local Plan and how sustainable greenfield sites outside of the urban area will be considered prior to the adoption of the new Havant Borough Local Plan. Once adopted by the Borough Council, it also provides a clear position statement as to which sites the Borough Council considers constitute sustainable development under the NPPF. The housing statement provides a means for the Council and communities to manage housing need and react quickly to prospective planning applications and appeals.
- 6.15 In *Hunston (R (Hunston Properties Ltd) v SSCG and St Albans City and District Council* [2013] EWCA Civ 1610), the Court of Appeal held that it was improper to blame a local planning authority if the OAN produced a shortfall in the absence of an up-to-date Local Plan: "Planning decisions are ones to be arrived at in the public interest, balancing all the relevant factors and are not to be used as some form of sanction on local councils. It is the community which may suffer from a bad decision, not just the local council or its officers."
- 6.16 This approach has been reinforced by a Direction issued by the Secretary of State in the recent determination of an appeal at Sewell Park in Hertfordshire, (APP/B1390/A/12/2180486 & APP/B1930/A/13/2201728). In refusing outline planning permission for 116 dwellings and 72 bed care home, the Secretary of State agreed with the Sewell Park Inspector concluding "it will be for the local plan examination process to establish the accuracy, credibility and plausible nature of the assumptions applied" despite the Council being unable to demonstrate a five year supply of housing land. At paragraph 114, the Inspector also comments "... given the extent of the housing land supply available, this is not of great significance as there has been substantial progress in the production of the plan and a clear timetable towards adoption." (IR14).
- 6.17 With the adoption of the Local Plan Housing Statement, the Borough Council will be able to demonstrate at least 4.42 years' supply of housing with the delivery of 'early release' sites. As such, the borough's only modest shortfall against the five year housing requirement together with the steps being taken to bring the Local Plan up-to-date must be considered in the overall planning balance in the determination of planning application and appeals.

- 6.18 As such, the individual merits of development proposals must continue to be considered on a case by case basis having regard to the three mutually dependent dimensions of sustainable development: social, economic and environmental in accordance with paragraphs 8, 9 and 14 of the NPPF and the policies which apply locally. It is therefore considered that the provision of a further new dwelling within flood zone 2 cannot be justified in this case as there are sequentially better sites available, and the provision of housing within this site would not be sustainable with regard to the environmental impact. An exception test is not required as set out in table 1 and 3 of the technical guidance of the NPPF.

(vi) CIL and SRMP considerations

- 6.19 The CIL rates to be applied to development are set out in the Havant Borough Community Infrastructure Levy Charging Schedule, which was adopted by the council on the 20 February 2013. This followed two public consultation exercises and an Examination into the Charging Schedule by an independent Examiner. The Examiners Report concluded that the Havant Borough Council Community Infrastructure Levy (CIL) Charging Schedule provided an appropriate basis for the collection of the levy in the borough. The levy is charged at £80 per square metre on new floorspace (measured as gross internal area). It is considered that there is a CIL liability for this site. However the value of the contribution cannot be determined at this outline stage as scale is a reserved matter.
- 6.20 This development would increase the number of dwellings within the 5.6km zone identified as significant in potentially increasing recreational pressure on the Solent SPA. Natural England's advice in regard all new housing developments within this zone is that it is likely to have a significant effect on the SPA. The measures of mitigation adopted by the LPA at the end of June 2014 requires a payment of £176 per dwelling to the Solent Recreation Mitigation Partnership.

7.0 COMMENT ON THE GROUNDS OF APPEAL

- 7.1 The issues raised within the appellants grounds of appeal have largely been covered within section 6 of this report.

The application has been considered against both Local and National Planning Policy and it has been found in section 6 that such a form of development would not be environmentally sustainable and thus would not meet the requirements of Core Strategy Policy CS15 or the NPPF.

8.0 CONCLUSION

- 8.1 The proposed development within 178a West Street should be refused on the grounds of the flood vulnerability of the site, non-payment of SRMP contribution, highway reasons and insufficient information regarding ecology. The site is a windfall site situated within Flood Zone 1, 2 and 3 and the development proposed is classified by the Environment Agency as a More Vulnerable Use. The National Planning Policy Framework requires that the Local Planning Authority undertake a Sequential Test to steer development to areas with the lowest probability of flooding. It is considered that there are sequentially better sites within the Borough and that the LPA is currently updating the Local Plan to establish an achievable 5 year housing supply. Therefore, there is no overriding justification for the development of additional dwellings within the

site which is defined as having a probability of flooding and would result in an unacceptable risk to life and property from flooding. As such, the proposal would be contrary to the provisions of the National Planning Policy Framework and Policy CS15 of the Havant Borough Local Plan (Core Strategy) 2011.

- 8.2 The Inspector is therefore respectfully requested to dismiss this appeal. Should, however, the Inspector be minded to allow the appeal and grant permission for the proposal, the Council would request that the planning conditions set out in the separate submitted document are attached to any permission.

APPENDICES

- (A) Site location plan.
- (B) Havant Borough Community Infrastructure Levy Charging Schedule
- (C) SRMP Documentation

HAVANT BOROUGH COUNCIL



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List of suggested conditions

- 1 Application for approval of reserved matters must be made not later than the expiration of three years beginning with the date of this permission and the development must be begun not later than whichever is the later of the following dates: (a) The expiration of three years from the date of this permission; or (b) The expiration of two years from the final approval of the reserved matters, or in the case of approval on different dates, the final approval of the last such matter to be approved.
Reason: To comply with the requirements of Section 92 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.
- 2 The approval of the Local Planning Authority shall be obtained in respect of the following reserved matters before the development first takes place – the appearance, landscaping and scale.
Reason: The application is granted in outline only under the provisions of Article 5 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 and details of the matters referred to in the condition have not been submitted for consideration.
- 3 No development hereby permitted nor any related site clearance shall commence until plans and particulars specifying the finished levels (above ordnance datum) of both the ground floors of the proposed buildings and the surrounding ground levels in relation to existing ground levels have been submitted to and approved by the Local Planning Authority.
Reason: In the interests of the amenities of the locality and having due regard to policies CS16, and DM8 of the Havant Borough Core Strategy 2011 which form part of the Local Development Framework and National Planning Policy Framework, March 2012.
4. Prior to the commencement of any development activities a single detailed scheme of ecological mitigation, compensation and enhancement measures (including but not necessarily restricted to):
 - site plan showing all ecological mitigation measures;
 - details of site lighting;

- details of reptile mitigation measures;
- details of the ongoing management and monitoring of retained/enhanced habitats and who shall be responsible);

shall be submitted to, and agreed in writing by, the Local Planning Authority. Any such measures shall thereafter be implemented in accordance with the agreed details and secured in perpetuity, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To provide ecological protection and enhancement in accordance with the Wildlife & Countryside Act 1981, National Planning Policy framework, NERC Act 2006 and Policy CS 11 of the Havant Borough Local Plan Core Strategy 2011.

5 Prior to the commencement of any specific phase of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority and notwithstanding any assessment provided

with the planning application), an assessment of the nature and extent of contamination at the site, whether originating from within or outside the curtilage, shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall be undertaken by competent persons, and the findings presented as a written report.

The assessment may comprise separate reports as appropriate, but unless specifically excluded in writing by the Local Planning Authority, shall include;

1) A site walk-over survey &/or sufficient desk-based research to identify;

- All relevant previous uses of the site
- Potentially significant contaminants associated with those uses
- Uncertainties relating to previous use or associated potential contaminants
- A conceptual site model identifying all relevant sources, exposure pathways and receptors, and;
- A summary of potentially unacceptable risks arising from contamination at the site.

2) Site investigation based on (1), to provide sufficient data and information to adequately identify & characterise any physical contamination on or affecting the site, and to inform an appropriate assessment of the risks to all receptors that may be affected, including those off site.

3) The results of an appropriate risk assessment based upon (1) & (2), and where unacceptable risks are identified, a Remediation Strategy that includes;

- appropriately considered remedial objectives,
- an appraisal of remedial &/or risk mitigation options, having due regard to sustainability, and;
- clearly defined proposals for mitigation of the identified risks.

4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the Remediation Strategy (3) are complete, identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

All elements shall be adhered to unless agreed in writing by the Local Planning Authority

Reason: Having due regard to policies DM10 of the Havant Borough Adopted Core Strategy [2011] and DM17 of the Havant Borough Local Plan (Allocations) [2014], Contamination may be present at the site as a result of both previous uses of the site, and from adjacent commercial land uses that could pose a risk to future occupants, or to controlled waters.

- 6 Prior to the occupation of any relevant part of the permitted development, any verification report required in accordance with condition above shall be submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan, and must demonstrate that site remediation criteria have been met. Where longer-term monitoring of pollutant linkages is identified as being necessary, the report shall clearly set out plans for monitoring, provision for maintenance, relevant triggers and contingency actions (a “long-term monitoring and maintenance plan”). The long-term monitoring and maintenance plan shall be implemented as approved.
Reason: Having due regard to policies DM10 of the Havant Borough Adopted Core Strategy [2011] and DM17 of the Havant Borough Local Plan (Allocations) [2014], Contamination may be present at the site as a result of both previous uses of the site, and from adjacent
7. The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) produced in January 2016 by Baker and Associates and the following mitigation measures detailed within the FRA:
1. Finished floor levels are set no lower than 6.701m above Ordnance Datum (AOD).
2. No land raising to occur within flood zone 3. Should the site layout change and land raising in flood zone 3 become required, compensatory flood storage will need to be established within the proposed development site.
The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.
Reason: To ensure that the proposed development and surrounding area remain safe over its lifetime.
This condition is in line with paragraph 103 of the National Planning Policy Framework and policy CS15 Flood and Erosion Risk of the Havant Borough Core Strategy March 2011.
8. No development shall take place until scheme for the provision and management of a 3 metre wide buffer zone alongside the Hermitage Stream shall be submitted to and agreed in writing by the local planning authority. Thereafter the development shall be carried out in accordance with the approved scheme and any subsequent amendments shall be agreed in writing with the local planning authority. The buffer zone scheme shall be free from built development including lighting, domestic gardens and formal landscaping; and could form a vital part of green infrastructure provision. The schemes shall include:
- Plans showing the extent and layout of the buffer zone
- Details of any proposed planting scheme (for example, native species)
- Details demonstrating how the buffer zone will be protected during development and managed/maintained over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plan
Reason: Development that encroaches on watercourses has a potentially severe impact on their ecological value. Development also gives the opportunity to enhance river corridors which is particularly valuable for wildlife.

This condition is supported by the National Planning Policy Framework (NPPF), paragraphs 109 and 118 which recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity. This condition is also in in with policy CS13 Green Infrastructure of the Havant Borough Core Strategy March 2011.

9. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason: Information provided by the Environmental Health Officer at Havant Borough Council indicates that contamination may be present at the site due to its historical uses. We are concerned that as a result of these uses contamination is likely to be present which may pose a risk to groundwater and surface water. The site lies within the groundwater Source Protection Zone (SPZ) 1c for the Bedhampton and Havant springs, a public water supply and lies on the border of the SPZ1. Preferential pathways could cause contamination to migrate downwards towards the Chalk (a principal aquifer) and pollute drinking water supplies. National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution.

10. No drainage systems for the infiltration of surface water drain age into the ground is permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approved details.

Reason: To ensure groundwater is protected from pollution. Infiltration systems should not be used unless a risk assessment can demonstrate that the system would not cause pollution of groundwater.

11. Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: The site lies within the groundwater Source Protection Zone 1c for the Bedhampton and Havant springs, a public water supply. Preferential pathways could cause contamination to migrate downwards towards the Chalk (a principal aquifer) and pollute drinking water supplies. Piling or any other foundation designs using penetrative methods can result in risks to potable supplies from, for example, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways. Thus it should be demonstrated that any proposed piling will not result in contamination of groundwater. The National Planning Policy Framework paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely

affected by unacceptable levels water pollution.

12. Prior to occupation of any part of the permitted development, any borehole installed for the investigation of soils, groundwater or geotechnical purposes should be decommissioned in accordance with a scheme to be agreed with the Local Planning Authority. Boreholes which need to be retained post-development for monitoring purposes must be securely locked, protected and inspected in accordance with a monitoring and maintenance plan which must be agreed with the Local Planning Authority.
Reason: To ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 109 of the National Planning Policy Framework.
The site lies within the groundwater Source Protection Zone 1c (SPZ1c) for the Bedhampton and Havant Springs. If these boreholes are not decommissioned correctly they can provide preferential pathways for contaminant movement which poses a risk to groundwater quality. Groundwater is particularly sensitive in this location because the proposed development site is within SPZ1c.
13. No development hereby permitted shall commence until a specification of the materials to be used for the surfacing of all open parts of the site proposed to be hardsurfaced has been submitted to and approved in writing by the Local Planning Authority. The development hereby permitted shall not be brought into use until the implementation of all such hardsurfacing has been completed in full accordance with that specification.
Reason: In the interests of the amenities of the locality and having due regard to policies CS16 and DM8 of the Havant Borough Core Strategy 2011 which form part of the Local Development Framework and National Planning Policy Framework, March 2012.
14. No development hereby permitted shall commence until plans and particulars specifying the alignment, type, height and, where appropriate, construction materials and design of all proposed screen walls, fences, hedges and other means of enclosure have been submitted to and approved in writing by the Local Planning Authority. Unless agreed otherwise in writing by the Authority, the development hereby permitted shall not be brought into use prior to the completion of the installation of all screening provision as is thus approved by the Authority. At all times thereafter, all of that screening provision shall be retained in a wholly sound and effective condition.
Reason: To safeguard the amenities of the locality and occupiers of neighbouring property and having due regard to policy CS16 of the Havant Borough Core Strategy 2011 which forms part of the Local Development Framework and National Planning Policy Framework, March 2012.
15. No development shall take place until all trees and hedgerows that are to be retained within or adjacent to the site have been enclosed with temporary protective fencing in accordance with BS:5837:2012 'Trees in relation to design, demolition and construction. Recommendations'. The fencing shall be retained throughout the period of construction and no activity prohibited by BS:5837:2012 shall take place within such protective fencing during the construction period.
Reason: To safeguard the continued health and presence of such existing vegetation and protect the amenities of the locality and having due regard to policies CS11, CS16 and DM8 of the Havant Borough Local Plan (Core

Strategy) 2011 and the National Planning Policy Framework.

16. The development hereby permitted shall not be occupied unless and until further details of bin storage provision are submitted to and approved in writing by the Local Planning Authority. The approved details shall thereafter be provided and maintained on site.

Reason: To ensure that suitable bin stores are provided in the interests of the amenities and character of the development having due regard to policy CS16 of Havant Borough Local Plan (Core Strategy) and the National Planning Policy Framework.

17. The car parking, servicing and other vehicular access arrangements shown on the approved plans to serve the development hereby permitted shall be made fully available for use prior to the development being first brought into use and shall be retained thereafter for their intended purpose.

Reason: In the interests of highway safety and having due regard to policy DM13 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

18. No development shall take place until plans and particulars specifying the following matters have been submitted to and approved in writing by the Local Planning Authority:

- (i) The provision to be made within the site for contractors' vehicle parking during site clearance and construction of the development;
- (ii) The provision to be made within the site for a material storage compound during site clearance and construction of the development.
- (iii) The provision to be made for any site huts during the site clearance and construction of the development.

Thereafter, throughout such site clearance and implementation of the development, the approved parking provision and storage compound shall be kept available and used only as such.

Reason: To safeguard the amenities of the locality and/or in the interests of traffic safety and having due regard to policies CS16 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

19. No development shall commence unless a method statement to demonstrate the proposed method of controlling the reversing of vehicles from the site during construction has been submitted to and approved in writing by the Local Planning Authority. The approved method shall be used during the course of the construction period unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of highway safety having due regard to policy CS20 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

20. Prior to the commencement of the development hereby permitted and in relation to the construction period, at least 10m of hardstand shall be provided within the site to accommodate deliveries in accordance with details to be submitted to and approved in writing by the Local Planning Authority. The hardstand shall be retained and available for deliveries during the construction period.

Reason: In the interests of highway safety and prevent the blocking of Bound Lane during deliveries having due regard to policy CS20 of Havant Borough

Local Plan(Core Strategy) 2011 and the National Planning Policy Framework.

21. No development hereby permitted shall commence until plans and particulars specifying the layout, depth and capacity of all foul and surface water drains and sewers proposed to serve the same, and details of any other proposed ancillary drainage works/plant (e.g. pumping stations) have been submitted to and approved in writing by the Local Planning Authority. The scheme should include details of:

- Pollution prevention measures to be incorporated; and,
- Inspection, maintenance and monitoring procedures and arrangements.

Unless agreed otherwise in writing by the Local Planning Authority, the development hereby permitted shall not be brought into use prior to the completion of the implementation of all such drainage provision in full accordance with such plans and particulars as are thus approved by the Authority.

Reason: The site lies within the groundwater Source Protection Zone 1c for the Havant and Bedhampton Springs, a critical public drinking water supply. Drinking water supplies are at risk from any pollutants which enter the ground, including increased turbidity. The applicant needs to demonstrate that the surface water drainage scheme will protect groundwater and drinking water supplies in accordance with National Planning Policy Framework paragraph 109, whilst also protecting the surface water environment and ensure that all such drainage provision is constructed to an appropriate standard and quality and having due regard to policies and proposals CS16 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

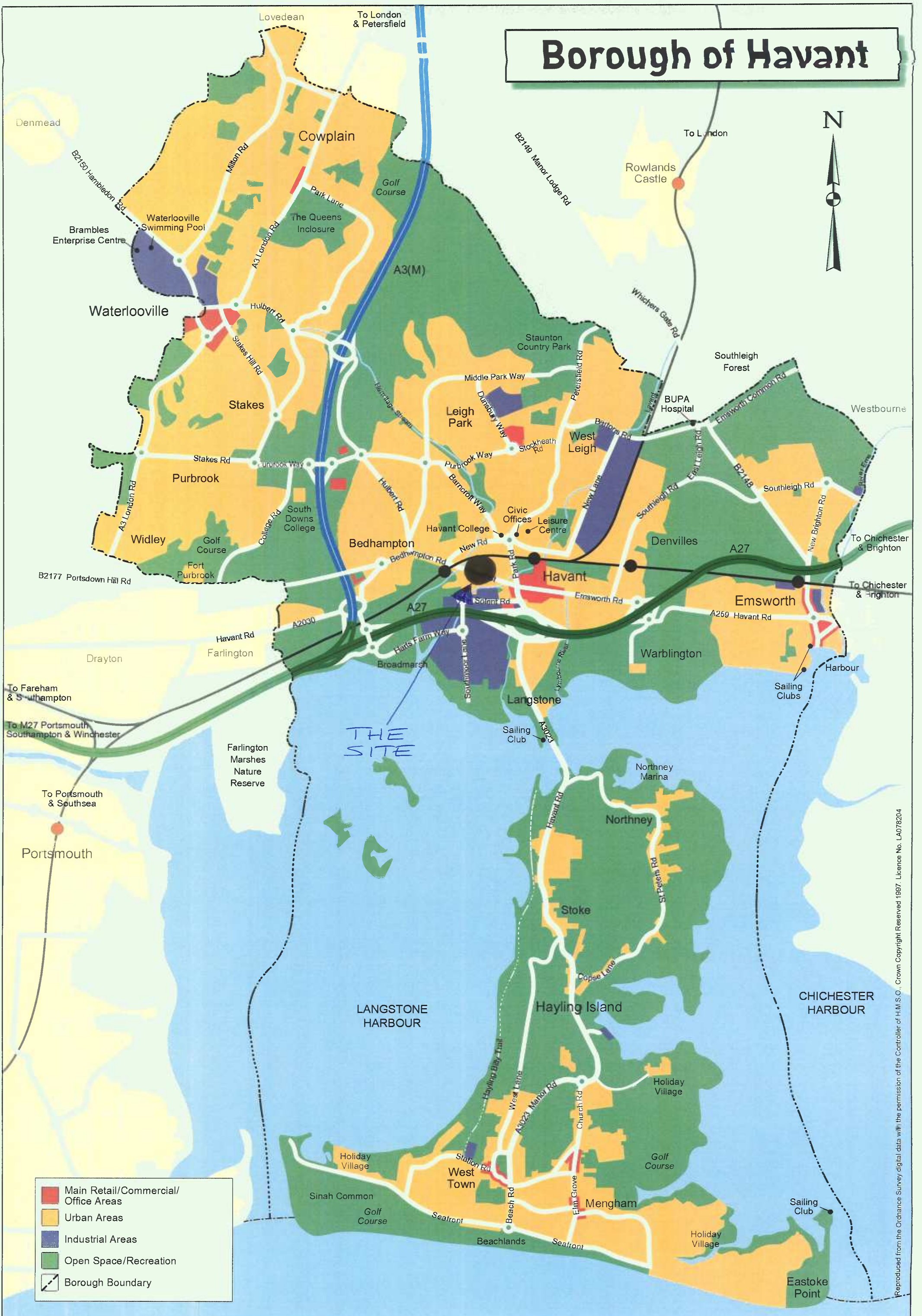
22. Notwithstanding the provisions of any Town and Country Planning General Permitted Development Order, no extension shall be constructed within the curtilage of the site without the prior approval of the Local Planning Authority.

Reason: In the interests of the visual amenities of the area and the amenities of the occupiers of nearby properties and having due regard to policy CS16 of the Havant Borough Core Strategy 2011 which forms part of the Local Development Framework and National Planning Policy Framework, March 2012.

23. The development hereby permitted shall be carried out in accordance with the approved plans.

Reason: - To ensure provision of a satisfactory development.

Borough of Havant





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APP/X1735/W/16/3155488

Land rear of and including The Coal Yard, 178A West Street, Havant, PO9 1LR

Scale: 1:1000

Havant
BOROUGH COUNCIL

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The Community Infrastructure Levy (CIL) is a new levy that local authorities can charge on developments in their area. CIL income can be used to fund additional infrastructure required to support new development including roads, schools, green spaces and community facilities.

CIL represents a fundamental change from the current system of developer contributions through Section 106 (S106) planning obligations, which can be complex and time consuming. While S106 will still be used for site specific measures required to make a development acceptable, the introduction of CIL means that the use of S106 will be limited.

The overall aim of these changes is to make the developer contributions system fairer, faster and more transparent than the previous system. It is intended to give developers more certainty over costs and give councils and communities more choice and flexibility in how to fund infrastructure.

The council have now produced a Developer Contributions Guide. The document is principally aimed at agents and developers who are involved in developer contribution discussions on a regular basis. It explains to customers how CIL works alongside other forms of planning contribution that may be necessary to make a proposal acceptable. The guide does not include new policies instead it draws together various strands of information, already available on the web and in practice, into a single comprehensive document. See related documents.

What CIL means for Havant

The CIL rates to be applied to development are set out in the Havant Borough Community Infrastructure Levy Charging Schedule, which was adopted by the council on the 20th February 2013. This followed two public consultation exercises and an Examination into the Charging Schedule by an independent Examiner. The Examiners Report concluded that the Havant Borough Council Community Infrastructure Levy (CIL) Charging

Schedule provided an appropriate basis for the collection of the levy in the borough. The Examiners Report can be viewed below.

The Charging Schedule took effect from the 1 August 2013.

Community Infrastructure Levy - Charging Schedule

Development Type	CIL Rate (£ per square metre)
Residential* (one dwelling or more)	£100
- Emsworth and Hayling Island	£80
- Rest of Borough **	
Hotel	£0
Industrial/Offices	£0
Retail- Town centre	£0
- Out of centre > 280 sq m	£80
- Out of centre < 280 sq m	£40
Community uses	£0

* The residential rate excludes extra care housing.

** The charging zone boundaries are shown below

The town centre boundaries are shown in [the Town Centre Maps Booklet](#).

How will the levy be charged?

The levy is charged in pounds (£) per square metre on new floorspace (measured as gross internal area) of any type of development which has a CIL rate set in the Charging Schedule. In Havant, the CIL rate applies to new residential and retail development.

CIL Calculator

A tool to provide an indicative values of potential CIL Liability, however the final figure will need to be agreed with Planning Services. The figures provided by the [CIL Calculator](#) have a base date of 1 August 2013. Indexation will apply to all permissions issued after 2013.

SRMP

From the 30th June 2014, the Council is seeking a financial contribution towards the Solent Disturbance Recreation Project (SRMP) now known as the Solent Recreation Mitigation Partnership. Natural England has advised that a contribution of £176 per dwelling (updated 1 April 2016) will be required to mitigate against the effects of recreational disturbance on the Solent Special Protection Area (SPA).

Policy CS21 of the Local Plan (Core Strategy) and Policy DM24 of the Local Plan (Allocations) provide the policy basis for the collection of this contribution, which will be applied to all new development of one or more dwellings. The Council has agreed two ways of securing the contribution:

- 1) Upfront payment prior to a decision being made
- 2) Section 106 legal obligation used where additional contributions payable/obligations to be monitored

For both options, administration and monitoring fees will be added.

Once your planning application has been validated, you will be contacted by your planning application case officer to agree the most appropriate method of payment.

For further details, please see the Developer Contributions Guide which provides background information on the contribution or the external link to the Solent Recreation Mitigation Partnership web pages (hosted by Portsmouth City Council).

Draft Local Plan Housing Statement

July 2016



Have your say on the Draft Local Plan Housing Statement by

Emailing: policy.design@havant.gov.uk

Writing to: **Local Plan Housing Statement, Planning Policy Team, Havant Borough Council, Civic Centre Road, Havant, PO9 2AX**

Any comments should be submitted to the Council on or before **9th September 2016**.
Please make sure you include your name, address and email address.

Please note that comments received cannot be treated as confidential and may be made publicly available as part of the Government Examination of the Local Plan.

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1. Introduction

Overview

- 1.1 This Local Plan Housing Statement has been produced in light of the Objectively Assessed Housing Need Update¹ and the South Hampshire Spatial Position Statement², both published by the Partnership for Urban South Hampshire (PUSH³) on 7 June 2016.
- 1.2 It has also been produced in light of the requirements of the National Planning Policy Framework (NPPF), most importantly the key requirement that Local Planning Authorities must boost significantly the supply of housing. In order to achieve this, the NPPF also requires Local Planning Authorities to keep Local Plans up-to-date and review them to respond flexibly to changing circumstances, in this case a change in the need for new homes.
- 1.3 More recently, through the Housing and Planning Act, Government have reinforced the importance that is placed on having an up-to-date Local Plan and the implications if a Local Planning Authority fails to do this. Under Section 146 of the Act, if the Secretary of State thinks that a Local Planning Authority is failing or omitting to do anything which is necessary for them to do in connection with the preparation or revision of a Local Plan, the Secretary of State may intervene to prepare or revise the Local Plan.
- 1.4 As such, it is essential that the Borough Council continue to positively plan for the future within this reality, achieving sustainable development and creating successful places for future generations. The Local Plan Housing Statement is the first step in addressing the rising housing need through a review of the Local Plan.
- 1.5 The Local Plan Housing Statement sets out how the Adopted Local Plan can be considered up to date, it will set out the direction of travel for the preparation of the new Havant Borough Local Plan and how sustainable greenfield sites outside of the urban area will be considered prior to the adoption of the new Havant Borough Local Plan.
- 1.6 The Local Plan Housing Statement is a fundamental part of the process of preparing the Havant Borough Local Plan 2036. The evidence base research, Sustainability Appraisal, Habitats Regulations Assessment, the consultation with statutory bodies and the public together with all the other work that goes into the creation of the Local Plan Housing Statement will all be submitted to the Government, subject to an Examination in Public and ultimately integrated into the Local Plan.
- 1.7 Alongside the Local Plan Housing Statement's role as the first formal step in the Local Plan preparation process, once adopted by the Borough Council, it will also provide a clear position statement as to which sites the Borough Council considers constitute sustainable development under the NPPF. To keep positively planning in the short term, it is proposed that a number of urban

¹ http://www.push.gov.uk/2c_objectively_assessed_housing_need_update.pdf

² http://www.push.gov.uk/work/planning-and-infrastructure/push_spatial_position_statement_to_2034-2.htm

³ The Partnership for Urban South Hampshire (PUSH) is comprised of all borough and district councils in South Hampshire, the two city councils and Hampshire County Council. More detail is available at www.push.gov.uk/partnership.htm.

extension sites could come forward ahead of their formal allocation in the Havant Borough Local Plan 2036.

- 1.8 The Local Plan Housing Statement is currently in draft format for consultation.

Background

- 1.9 A Local Planning Authority's housing requirement is established through a comprehensive assessment of housing need across the relevant Housing Market Area (HMA). This forms part of past and ongoing work with nearby local authorities, under the duty to cooperate, to establish whether and how that need can be met across the HMA.
- 1.10 The Borough Council worked through PUSH with the ten other local authorities across the Solent sub-region to produce the South Hampshire Strategic Housing Market Assessment (SHMA)⁴. The SHMA shows an extremely high level of housing need across the three HMAs⁵ along the Solent.
- 1.11 The requirement to address housing need is set out in the National Planning Policy Framework (NPPF) (2012):
- “To boost significantly the supply of housing, local planning authorities should:
-use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period” (NPPF 2012, paragraph 47)
- 1.12 Government have set out through section 153 of the NPPF that Local Plans can be reviewed in order to adapt to changing circumstances, which is ultimately the case with the housing need up to 2036. Equally the review must, in order to comply with the NPPF, plan positively to address the high housing need which exists across South Hampshire in general and Havant borough in particular.
- 1.13 The Housing and Planning Act (Section 146) gives the Government a great deal of potential power. It sets out that if the Secretary of State thinks that the Borough Council are failing or omitting to do anything which is necessary in connection with the review of the Local Plan, they can intervene and prepare or revise the Local Plan instead. Alternatively, they can give directions to the Borough Council relating to the review of the plan.
- 1.14 It is clear from the evidence of the SHMA that the level of housing need and the requirement to meet it, as far as is consistent with the NPPF, will require further development sites to be identified over and above those in the Adopted Local Plan. As such, it is necessary for a new Havant Borough Local Plan to be produced.
- 1.15 On this basis, a review of the Local Plan will move swiftly forward. As a key part of this, the housing need identified in the SHMA must be assessed against suitable land for development taking into account significant constraints across the HMA to inform new housing targets and allocations.

⁴ This should be taken to include both the South Hampshire Strategic Housing Market Assessment (January 2014) and the Objectively-Assessed Housing Need Update (April 2016).

⁵ One HMA focussed around Southampton, one focussed around Portsmouth and one contained on the Isle of Wight. The Portsmouth HMA contains all of Havant, Portsmouth and Gosport and sections of East Hampshire, Fareham and Winchester.

Guiding Principle 1

The Strategic Housing Market Assessment shows a high level of housing need in Havant borough and across the Portsmouth Housing Market Area. As such, Havant Borough Council will initiate a review of the Adopted Local Plan in order to continue positively planning for all development needs in the borough into the future and ensure that decisions regarding the Local Plan can continue to be taken locally.

- 1.16 It will be important that the Council do not obstruct or refuse residential development that is sustainable and appropriate under the NPPF whilst the new plan is being produced, although such schemes could be contrary to policy AL2 of the Adopted Local Plan (Allocations) which relates to development outside the urban areas of the borough. Positively considering sites which are appropriate and sustainable, yet outside the urban areas defined in the Adopted Local Plan (Core Strategy and Allocations), simply has regard to the higher housing requirement that will inevitably need to be included in the new Local Plan.
- 1.17 Considering these sites positively, at this early stage of the plan's preparation, will allow the Borough Council to maintain some control and manage planning decisions taken at the local level rather than through appeals. Importantly it will also help the Borough Council in demonstrating a five year housing land supply position in the years ahead. Allowing appropriate development sites to start their planning journey now will improve the likelihood of new homes being delivered at the right time in order to contribute to the higher housing requirement identified in the South Hampshire Spatial Position Statement.
- 1.18 Whilst the housing need figure is not a target, it is necessary to ensure that any suitable sites which come forward that will help to meet this need are approved without delay. This will be in the interest of meeting as much housing need as is sustainably possible in order to comply with the NPPF. Alongside this the Borough Council will seek to protect those areas which are not suitable for development, such as when development would be contrary to the NPPF, loss important employment land/uses or where flood risk would constitute a constraint.
- 1.19 Equally, it is important that the Borough Council, in continuing to plan positively for the future of the borough, fulfils its requirements and obligations under the Housing and Planning Act, which achieved Royal Consent on 12th May 2016, and any associated secondary legislation or change to national policy.
- 1.20 A higher housing requirement is a certainty in the new Local Plan and the Housing Statement seeks to identify realistic development potential for housing to meet this requirement and begin discussions with communities and other stakeholders about these sites. By extensively considering the development potential of the borough the Borough Council are seeking to address the SHMA housing need figure in accordance with the NPPF.

2. The Adopted Local Plan

- 2.1 Havant Borough's Adopted Local Plan (Core Strategy 2011 and Allocations Plan 2014)⁶ covers the period until 2026. The Adopted Local Plan is considered up-to-date. The Local Plan (Core Strategy) was adopted prior to the NPPF and the housing target is based on the now revoked South East Plan. This fact was explored when the Local Plan (Allocations) was examined in 2014.

"After the publication of the NPPF in March 2012 the PUSH authorities approved the South Hampshire Strategy (SHS), which provides a sub-regional basis for the local authorities housing requirements... The CS [Core Strategy's] housing target towards which the allocations in this Plan will contribute is consistent with the SHS and remains broadly accurate when tested against the "What Homes Where" toolkit." (Inspector's Report on The Examination into Havant Borough Local Plan (Allocations) (2014))

- 2.2 The Inspector considered the overall compliance of the Local Plan with national policy. This is a requirement of paragraph 182 of the NPPF which sets out that to be sound a plan must be consistent with national policy as well as being positively prepared, justified and effective. The Inspector was careful to differentiate the different parts of the Local Plan. Paragraph 9 of the Inspectors Report on the Local Plan (Allocations) makes this completely clear and states that: "The Havant Borough Local Plan (Core Strategy) was adopted in March 2011 and is referred to as the Core Strategy (CS). This Plan, the Local Plan (Allocations) seeks to deliver the vision for growth that is set out in the CS... the two documents are intended to be read together to form the Havant Borough Local Plan." In assessing legal compliance, the Inspector states: "The Local Plan complies with national policy".
- 2.3 Indeed, the 2014 PUSH SHMA was published prior to the conclusion of the Examination into the Local Plan (Allocations). In paragraph 9 of the report, the Inspector set out that "The PUSH authorities, together with Hampshire County Council (HCC) and the Solent Local Enterprise Partnership, commissioned a Strategic Housing Market Assessment (SHMA) to help assess housing need through to 2036. This was published in March 2014 and will inform a forthcoming review of the PUSH Spatial Strategy". This sets out clearly how the Inspector considered the content of the Local Plan (Allocations) with clear knowledge of the housing need in the borough up to 2036. With all of the evidence before her, including relating to housing need up to 2036, the Inspector concluded that the Local Plan (Allocations) was legally compliant, justified, effective and consistent with national planning policy.
- 2.4 As a result, whilst the SHMA will form an essential part of the evidence base for the new Local Plan but it does not render the Adopted Local Plan out of date. This point has been made clear by Government⁷, stressing "The publication of a locally agreed assessment provides important new evidence and where appropriate will prompt councils to consider revising their housing requirements in their Local Plans. We would expect councils to actively consider this evidence over time and, where over a reasonable period they do not, Inspectors could justifiably question the approach to

⁶ Hereafter referred to as the Adopted Local Plan.

⁷ Letter from Brandon Lewis, then Minister of State for Housing and Planning, to the Chief Executive of the Planning Inspectorate (19 December 2014) – available at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/390029/141219_Simon_Ridley_-_FINAL_SIGNED.pdf

housing land supply. However, the outcome of a Strategic Housing Market Assessment is untested and should not automatically be seen as a proxy for a final housing requirement in Local Plans. It does not immediately or in itself invalidate housing numbers in existing Local Plans”.

- 2.5 Following the initial publication of the SHMA, work began on the South Hampshire Spatial Position Statement, which has now been published. It is entirely appropriate under the NPPF's duty to cooperate that discussions regarding meeting the level of development need take place between all local authorities in the HMA. This strategy of effective cooperation has led to the publication of a comprehensive plan for housing delivery across the HMA.
- 2.6 The Local Plan Housing Statement, which sets out how the Borough Council intends to meet its housing requirements under the NPPF, is being published shortly after the South Hampshire Spatial Position Statement. It shows the importance that the Borough Council places on swiftly preparing the Havant Borough Local Plan 2036. No reasonable period can have said to have passed and so it would be illogical to question the Borough Council's approach to housing land supply following the Adopted Local Plan at this point.

Guiding Principle 2

The Adopted Local Plan is considered up-to-date as per the definition in paragraphs 157 and 158 of the NPPF. Decisions regarding five year housing land supply will continue to be taken on this basis.

3. Future Housing Potential

- 3.1 The PUSH SHMA shows a need for 121,500 new homes across South Hampshire between 2011 and 2036. Of these 49,500 should be provided in the Portsmouth HMA of which 11,250 should be provided in Havant Borough. The NPPF is clear in paragraph 47 that Local Plans must “[meet...the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period](#)”.
- 3.2 A high level technical analysis has been completed to understand whether the established need can be met in a way which would constitute sustainable development and if not, how best it can be met. This is set out in detail in the Housing Constraints and Supply Analysis Paper, which accompanies the Local Plan Housing Statement. A thorough examination of the housing land supply and potential sites has taken place. The borough's Strategic Housing Land Availability Assessment (SHLAA) has also been refreshed and incorporates the results of a 'call for sites' which was undertaken in January 2016 and a reappraisal of some employment sites that may be more suitable for housing. This has informed an approach to identifying sites suitable for housing which are free from overriding constraints. This is intended to maximise the level of development as the Borough Council seeks to meet its objectively assessed need.
- 3.3 The Housing Constraints and Supply Analysis Paper provides detail as to the process undertaken to establish if the borough can meet its objectively assessed need and, if not, how much sustainable development the borough can accommodate.
- 3.4 In line with the NPPF, development on brownfield land has been prioritised through the analysis in the SHLAA's assessment of suitability. Nonetheless, the high level of need for new homes means that development of greenfield sites will also be necessary.
- 3.5 A constraints analysis (detailed in the Housing Constraints and Supply Analysis) firstly looked at high level constraints (i.e. those that make a site unsustainable for development). This analysis has shown that sections of the borough would be inherently unsustainable for substantial levels of future development.
- 3.6 Taking the established housing need for the borough of 11,250 there are already a significant amount of homes already 'in the bag'. Taking the completed dwellings since 2011, the sites with outstanding planning permission, the local plan allocations without planning permission and windfall there is a supply of 6,447. Against the need for new housing of 11,250, this leaves 4,803 homes still to find sites for.

	Need requirement	Net Dwellings Completed or Committed
Total Borough Objectively Assessed Need (OAN) 2011-2036	11250	
Completed dwellings (2011/12 – 2014/15)		1109
Permissions (outstanding planning permissions at 01/04/15)		1752
Allocations in current Local Plan (yet to be completed/permitted at 01/04/15)		1986
Windfall Development (up until 2036)		1600
Totals	11250	6447
Remaining OAN to be addressed (i.e. the gap)		4803

Table 1: Existing completions and commitments vs OAN



Figure 1: existing housing supply compared to the need for new homes as set out in table 1 of the Draft Local Plan Housing Statement.

- 3.7 In order to address this apparent gap, further investigation has taken place for additional housing potential in the borough. This has used the SHLAA process (including the 2016 call for sites and SHLAA refresh) to establish further brownfield and greenfield sites that offer potential.

Further Urban Area Sites

- 3.8 Limited further brownfield sites within the existing urban area which could be developed for housing have been identified. Any potential urban area housing sites are already supported in principle through the Adopted Local Plan (in particular Policy CS17). These are the types of sites already accounted for in the detailed windfall analysis. Delivery from small-scale windfall sites will continue to be taken into account.

Guiding Principle 3

Havant Borough Council will continue to prioritise the development of brownfield land:

- The new local plan will maximise the residential development of brownfield sites by looking at potentially significantly higher densities around town centres and transport hubs
- Prior to the adoption of the new local plan, development on brownfield sites which are considered suitable for housing under the Adopted Local Plan will continue to be supported, even if they are not specifically allocated.

- 3.9 Further greenfield urban extension sites of various sizes have also been considered. These are sites already identified in the SHLAA but which are not allocated in the Adopted Local Plan and previous or slightly revised SHLAA sites (for instance when site areas may have changed). Some new SHLAA sites have also been submitted as part of the 2016 'call for sites'. In addition to this previous discounted SHLAA sites have been reconsidered in light of identified housing need.
- 3.10 In light of the identified housing need and the 4,803 dwelling 'gap' identified in Table 1 it is appropriate that the Borough Council considers appropriate greenfield sites for development in the short term.

Site reference	Site	Indicative No. of dwellings
Emsworth		
UE39	Land North of Hollybank Lane and Long Copse Lane	54
UE50	Land North of Long Copse Lane	166
UE67	Land to the rear of Redlands House	5
UE02b	Land North and West of Selangor Avenue	154
Havant and Bedhampton		
UE28	Littlepark House, Bedhampton	47
UE30	Land South of Lower Road, Bedhampton	50
UE52	Land adjacent to 47 Portsdown Hill Road	5
UE53	Land East of Castle Avenue	60
UE55	Southleigh Park House	35
UE68	Forty Acres	300
Hayling Island		
UE17	Land South of Rook Farm	53
UE35	Land North of Rook Farm	119
UE63	Land West of Rook Farm	222
UE18	Station Road (North of Sinah Lane/West of Furniss Way)	161
	Total	1431

Table 2: Further Greenfield sites outside of the urban area

- 3.11 The sites listed in Table 2 have all been considered through the 2016 SHLAA process to be deliverable or developable. As such they are free of constraints that cannot be mitigated, are available for development, and sustainable development could be achieved on the site. As such, given the level of housing need, they would be put forward for allocation in the new Local Plan.

- 3.12 However they are all outside the urban areas identified in the Adopted Local Plan and so would be contrary to policies CS17 and AL2 which indicate that residential development should be resisted. However, it is considered that the level of need means that, even though it would be a departure from the Adopted Local Plan, the principal of residential development on these sites should be supported, subject to compliance with the remainder of the Adopted Local Plan.
- 3.13 Being proactive and supporting appropriate and sustainable development on the urban edge now will help to ensure that a five year housing land supply will be sustained. Positive decisions now will allow for the inevitable lag time between planning discussions/approvals on a site and dwellings being completed (and thereby contributing to five year supply). In all instances other relevant policies in the Adopted Local Plan would still need to be met and sites not included in Table 2 will be considered in relation to the NPPF and Adopted Local Plan.

Guiding Principle 4

The principle of residential development will be considered favourably on those sites identified in Table 2 to contribute towards the high objectively assessed need for new housing in the borough. Proposals coming forward for these sites should continue to meet the full requirements of the Adopted Local Plan except policies CS17 and AL2.

- 3.14 Table 3 and figure 2 (below) shows that even when taking into account these additional sites there still remains a significant gap (3,372) between the objectively assessed need for housing and the available supply in the borough.

	Need requirement	Net Dwellings Completed , committed and further supply
Total Borough Objectively Assessed Need (OAN) 2011-2036	11250	
Completed dwellings (2011/12 – 2014/15)		1109
Permissions (outstanding planning permissions at 01/04/15)		1752
Allocations in current Local Plan (yet to be completed/permitted at 01/04/15)		1986
Windfall Development (up until 2036)		1600
Additional greenfield sites outside of the urban area		1431
Totals	11250	7878
Remaining OAN to be addressed (i.e. the gap)		3372

Table 3: Existing completions, commitments and additional greenfield vs OAN



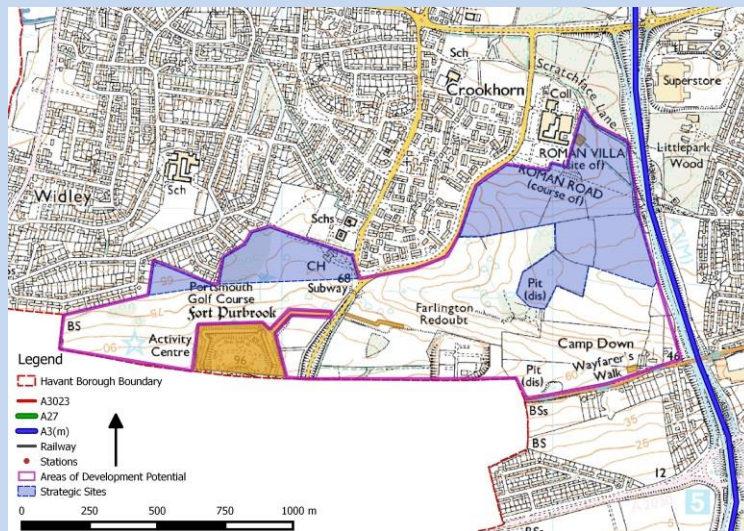
Figure 2: existing housing supply and urban extension sites compared to the need for new homes as set out in table 3 of the Draft Local Plan Housing Statement.

3.15 With the relatively compact and already heavily developed nature of the borough there are very few opportunities remaining for sustainable development to further close this gap. However, with the NPPF requiring objectively assessed housing need to be addressed, no stone should remain unturned in the search for potential development sites. This means that we must also look at those few larger remaining undeveloped parts of the borough that are free from substantial constraint. This leads to the consideration of two new strategic development sites.

New Strategic Sites

3.16 There are two areas of the borough which are free from significant high level constraints and which remain undeveloped. Without positively identifying these sites and working with the landowners or their representatives to identify the best way to take the sites forward for development there is a risk that proposals for these sites could be speculatively submitted, potentially in a piecemeal manner. This is likely to undermine the ability to secure the right infrastructure delivered at the right times to support any new substantial developments. It will also lessen the ability to achieve a sustainable and well planned community.

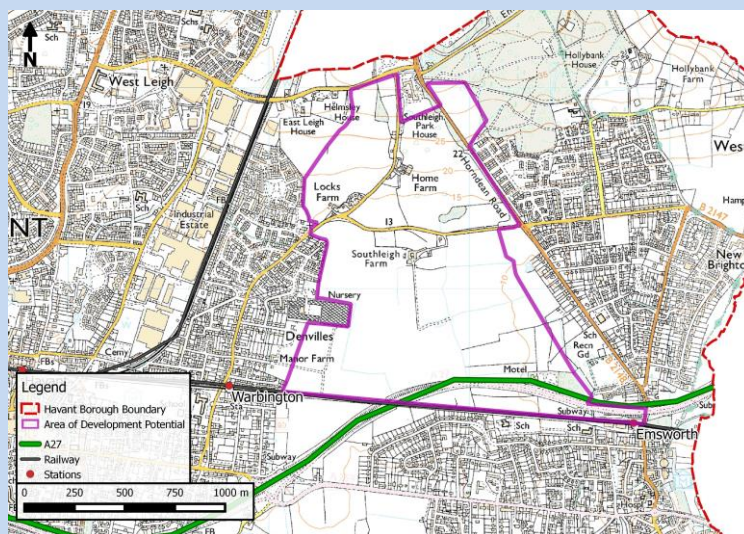
Strategic Site 1: Campdown



Further details about this site and the potential for new development is included in the Strategic Development Areas Financial Feasibility Study. It is considered that the site is likely to be capable of accommodating a minimum of 400 dwellings and sports facilities to accommodate the needs of the Borough's growing sports clubs. This should be provided for within the site's net developable area (shaded blue in the map above) whilst the remainder of the site would be used for leisure purposes.

The development will require as a minimum improvements to nearby highway infrastructure, green infrastructure and utilities in order for the site to be delivered. Further work regarding infrastructure provision is ongoing and will feed into the allocation for the site in the new local plan.

Strategic Site 2: Area Between Denvilles and Emsworth



Further details about this site and the potential for new development is included in the Strategic Development Areas Financial Feasibility Study. It is considered that the site is likely to be capable of accommodating a minimum of 1,650 dwellings and a local centre.

The site will require as a minimum improvements to nearby highway infrastructure, a new junction on the A27 and associated link road north, a new primary school, green infrastructure and surface water drainage. The development will need to be laid out in such a way that there remains clear distinction between the settlements of Emsworth, Denvilles and Warblington after completion of the development. Further work regarding infrastructure provision and settlement identity is on-going and will feed into the allocation for the site in the new Local Plan.

- 3.17 In order to address the borough's housing need as part of the new Local Plan it is inevitable that these sites will need to be considered. Preliminary work looking at the infrastructure requirements, development capacity and timeframes for the sites coming forward has started and it is proposed that this continues through the Local Plan process. All this can feed into appropriate masterplanning and the new Local Plan as appropriate.
- 3.18 Strategic sites of this nature require extensive preliminary work and have longer lead in times than smaller sites. It is intended that public consultation will inform a Masterplan to bring the sites forward in the most sustainable way which ensures that they are high quality communities which will stand the test of time. Community involvement in the masterplanning of the larger strategic site between Denvilles and Emsworth will be facilitated through a Development Charrette⁸.
- 3.19 Piecemeal development of the strategic sites would hinder the ability to ensure the correct type and scale of infrastructure is provided. Poor quality piecemeal development could result in less housing being provided as the most efficient layout across the entirety of the site is not being proposed. As such, it is vital that these sites are progressed through the new Local Plan with the appropriate level of background evidence and analysis and with the input of local communities. This will ensure that the benefits from delivering the new strategic sites are maximised. Delivery in a comprehensive manner can bring benefits to existing as well as new communities such as through the provision of new educational or sports facilities, highway infrastructure and retail outlets.

Guiding Principle 5

The comprehensive development of Campdown and the Area Between Denvilles and Emsworth will be progressed through the new Local Plan. Both strategic sites should be appropriately masterplanned, in consultation with local communities, in order to ensure that they are brought forward comprehensively. This will establish the development potential of the two sites, the mix of development types which should be brought forward, phasing, settlement identity and infrastructure requirements.

So as to ensure that the correct scale and type of infrastructure is provided, development of these sites in whole or part will be resisted until they are allocated through the new Local Plan.

- 3.20 Policies to support the delivery of these strategic sites will be developed as part of the new local plan.
- 3.21 The extensive preliminary work, understanding of infrastructure requirements, anticipated scale and timescale of development at the strategic sites means that phasing and overall delivery projections for the strategic sites will be separated out from the remainder of the borough when it comes to housing policy, monitoring and projected supply. This is to allow for the lead in time required for schemes of this scale which mean a steady annualised delivery spread over a plan period will not be possible.
- 3.22 The details of this Local Plan Housing Statement and supporting Housing Constraint and Supply Analysis Paper demonstrate that no stone has been left unturned in trying to best meet the

⁸ A Development Charette is an intensively produced, community-led masterplan for a development site. Usually, in a one or two week session, the charrette assembles key stakeholders, including the public, to collaborate with the design team allowing iterative design proposals, feedback and revisions to take place. This has been shown to be an effective means of encouraging input and producing a valuable masterplan that everyone has mutual ownership of. It is intended that the Design Charette for this site will take place later in 2016 and will eventually inform a masterplan of the site which will be adopted as a Supplementary Planning Document.

identified housing need for Havant Borough. The SHLAA has been revisited and a detailed analysis and understanding has been developed on the development potential for the borough.

- 3.23 When assessing all the above potential sources of supply, including the potential strategic sites at Campdown and the Area Between Denvilles and Emsworth, a gap remains between what can be sustainably achieved in Havant Borough and the housing need for the borough. This gap stands at 1,322 dwellings as shown in table 4 and figure 3 (below).

	Need requirement	Net Dwellings Completed, committed and further supply
Total Borough Objectively Assessed Need (OAN)	11250	
Completed dwellings (2011/12 – 2014/15)		1109
Permissions (outstanding planning permissions at 01/04/15)		1752
Allocations in current Local Plan (yet to be completed/permitted at 01/04/15)		1986
Windfall Development (up until 2036)		1600
Additional greenfield sites outside of the urban area		1431
Strategic Sites (Camp Down and area between Denvilles and Emsworth)		2050
Totals	11250	9928
Remaining OAN unaddressed (i.e. the gap)		1322

Table 4: Total Projected commitments, supply and new strategic sites vs OAN



Figure 3: existing housing supply and urban extension sites compared to the need for new homes as set out in table 3 of the Draft Local Plan Housing Statement.

- 3.24 The South Hampshire Spatial Position Statement covers the period 2011-2034 (therefore two years less than the housing need information in the SHMA and the figures referred to above). Table H1 of the South Hampshire Spatial Position Statement (Distribution of Housing) indicates a development requirement of 9,170 dwellings in Havant Borough between 2011-2034. As such the Housing Statement is proposing development of 758 more homes than the minimum requirement of the PUSH Spatial Position Statement.

Phasing/Annual Requirements

- 3.25 New housing provision in the borough up until 2036 is likely to include a heavy reliance on the new strategic sites (currently making up over 20% of the overall supply potential). Therefore realistic phasing will be required. It is envisaged that the new strategic sites will start to have completed

dwellings in approximately 2026. Any acceleration of that would be dependant on significant forward funding of the major infrastructure required to support this scale of development. On the basis of completions on-site starting in 2026 a housing phasing strategy based on Table 5 is proposed. This will need to be refined as part of preparation on the new Local Plan.

	Net Dwellings	Delivery (approx.)
Total New Strategic Site Delivery	2050	Delivery 2026 – 2036 at 205 dwellings per annum
Remain parts of the borough	7878	Delivery 2011 – 2036 at 315 dwellings per annum

Table 5: Potential target/phasing approach for housing delivery 2011-2036 (figures may not add up due to rounding)

- 3.26 Further work will be undertaken to confirm whether the market can support this quantum of development (i.e. whether housebuilders are able to build out at this rate). This will be investigated as appropriate in preparation for the new Local Plan.

4. Conclusion

- 4.1 The Local Plan Housing Statement is a fundamental part of the process of preparing the Havant Borough Local Plan 2036. Alongside this, once adopted by the Borough Council, it will also provide a clear position statement as to which sites the Borough Council considers constitute sustainable development under the NPPF and will ensure that positive planning for the borough's future continues until the new Local Plan is adopted.
- 4.2 The Borough Council has been extremely thorough in examining all potential land across the borough and has left no stone unturned in the search for sustainable sites for development. Taking all the above potential sources into account the total potential supply from 2011-2036 is 9,928 dwellings. As can be seen this does not meet the OAN for the borough and leaves a shortfall of 1,322 dwellings.
- 4.3 The above information and analysis on potential development sites has been provided to inform the South Hampshire Spatial Position Statement. Table H1 of the document (Distribution of Housing) indicates a development potential of 9,170 dwellings in Havant Borough between 2011-2034. Havant Borough Council will continue to search for additional sustainable sites and where possible higher densities when formulating the new Local Plan in order to further reduce the 1,322 dwelling gap with the aim of fully meeting the objectively assessed need.
- 4.4 However, as the overall need figure is based on and applied across the HMA, which includes six local authorities, it is expected that the 1,322 dwelling shortfall will need be addressed by those other authorities that have more extensive land availability that is free from similar high level constraints (as used in the background analysis undertaken by Havant Borough Council). Similarly it is acknowledged that Havant Borough is on the edge of the HMA so it is equally important to liaise with our neighbours at Chichester District Council. The Borough Council will continue to work positively with the other local authorities in the HMA together with Chichester District Council in seeking to meet the defined need for new housing in this area.

Guiding Principle 6

The Borough Council will continue to fully comply with our duty to cooperate under the NPPF. We will work with nearby local authorities with the aim of reducing or eliminating any identified but unaddressed housing need. We will also continue to work with other relevant organisations to ensure that the step change in development which must take place in the borough does so in a way which constitutes sustainable development as defined in the NPPF.



Draft Local Plan Housing Statement

Annex A: Explanation of terms and site map booklet

July 2016



1. Explanation of terms

Overview

- 1.21 This annex sets out a detailed explanation of the terms used in the Draft Local Plan Housing Statement. It also includes maps of all the sites identified in Table 2 of the .

Explanation of terms and figures

- 1.22 The need for new housing in Havant Borough has been calculated through the 2016 Objectively-Assessed Housing Need Update⁹, which was commissioned by the Partnership for Urban South Hampshire (PUSH), of which Havant Borough Council is a part. This study uses a set Government Methodology to establish the need for new housing. The figure for Havant Borough's housing need is 11,250 up to 2036.

Term used	Explanation	Number
Completed dwellings (2011/12 – 2014/15)	The existing local plan covers the period 2006 -2026. All the dwellings count that have been built under the existing local plan since 01/04/2011 when the new local plan starts.	1,109
Permissions (outstanding planning permissions at 01/04/15)	The amount of new homes provided if all homes with planning permission on 01/04/2015 are built out. This is the most up-to-date data available.	1,752
Allocations in current Local Plan (yet to be completed/permitted at 01/04/15)	The allocations set out in the Adopted Local Plan ¹⁰ without planning permission at 01/04/2015. This is the most up to date data available.	1,986
Windfall Development (up until 2036)	Windfall is housing that comes forward on small sites that could not be foreseen, e.g. a house is demolished and 4 new homes built, make 3 net additional homes. Windfall is based on past trends in each of five areas of the borough and further detail is available in the Analysis and Justification Background Paper ¹¹ .	1,600
Additional greenfield sites outside of the urban area	The minimum amount of new housing which would be provided from all greenfield urban extension sites in table 2.	1,431
Strategic Sites (Campdown and area between Denvilles and Emsworth)	Minimum amount of new housing which would be provided from the two strategic sites.	2,050

⁹ This is available on the PUSH website at http://www.push.gov.uk/item_12_-_appendix_2_housing_oan.pdf.

¹⁰ Which is comprised of the Local Plan (Core Strategy) (<http://www.havant.gov.uk/planning-and-environment/planning-policy/local-plan-core-strategy>) and Local Plan (Allocations) (<http://www.havant.gov.uk/planning-and-environment/planning-policy/local-plan-allocations>).

¹¹ <http://www.havant.gov.uk/sites/default/files/documents/Windfall%20Background%20Paper%202013.pdf>

2. Site maps – Individual sites shown in orange

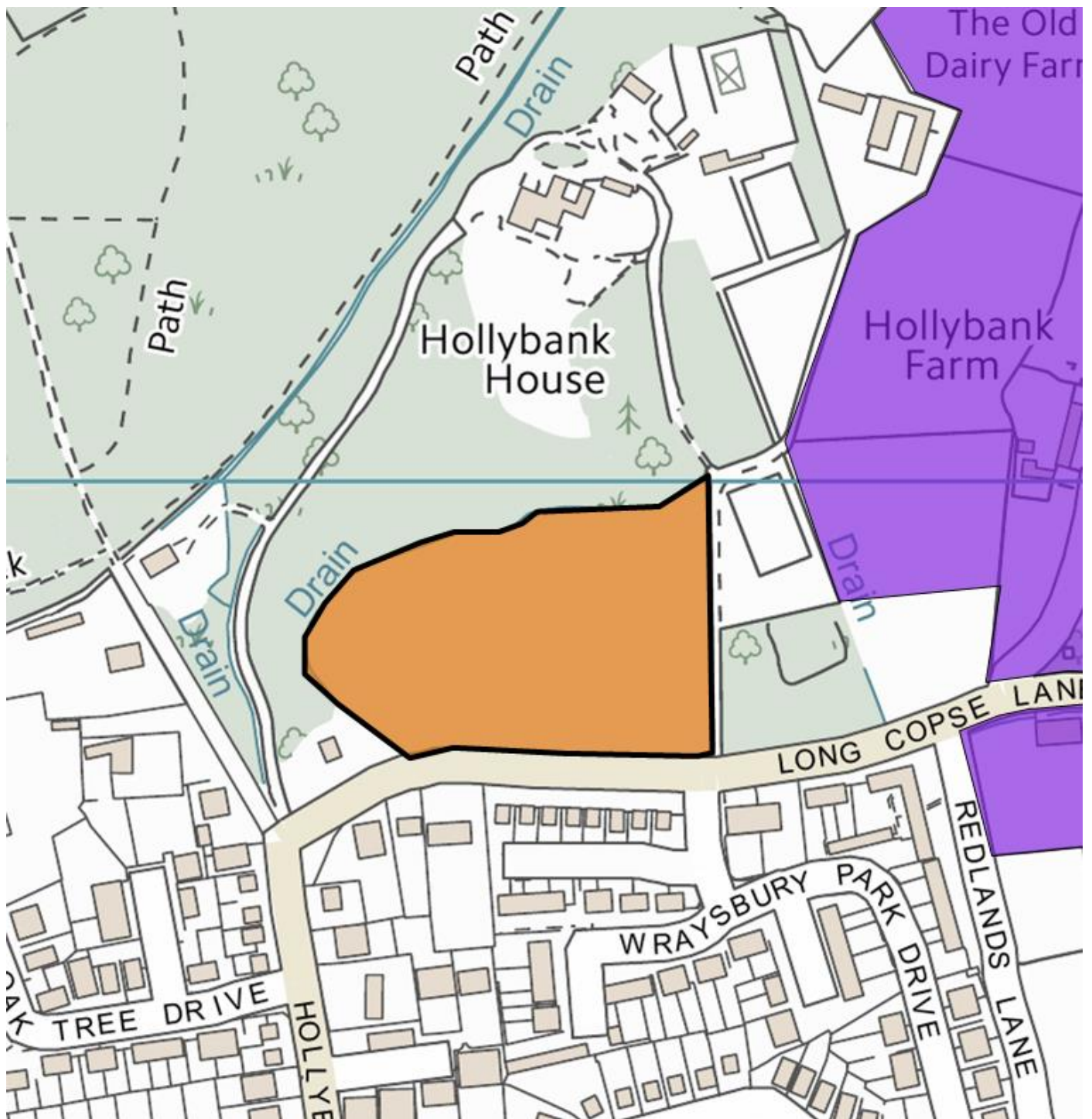
2.1 This section sets out maps of the proposed greenfield urban extension sites which are set out in table 2 of the Draft Local Plan Housing Statement.

Emsworth sites

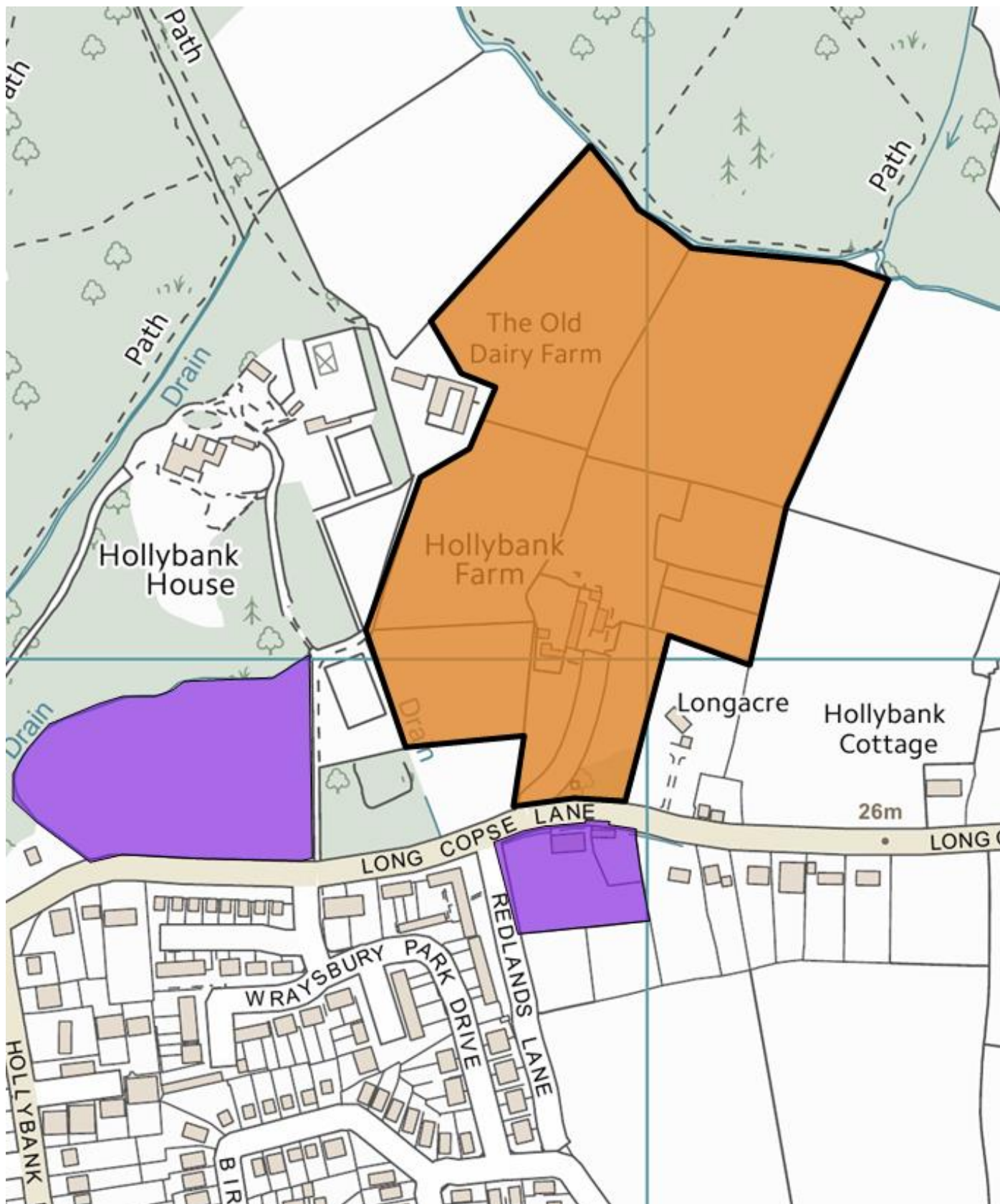
- Land north of Hollybank Lane and Long Copse Lane (54)
- Land north of Long Copse Lane (166)
- Land to the rear of Redlands House (5)
- Land north and west of Selangor Avenue (154)

Total through urban extensions in Emsworth: 379

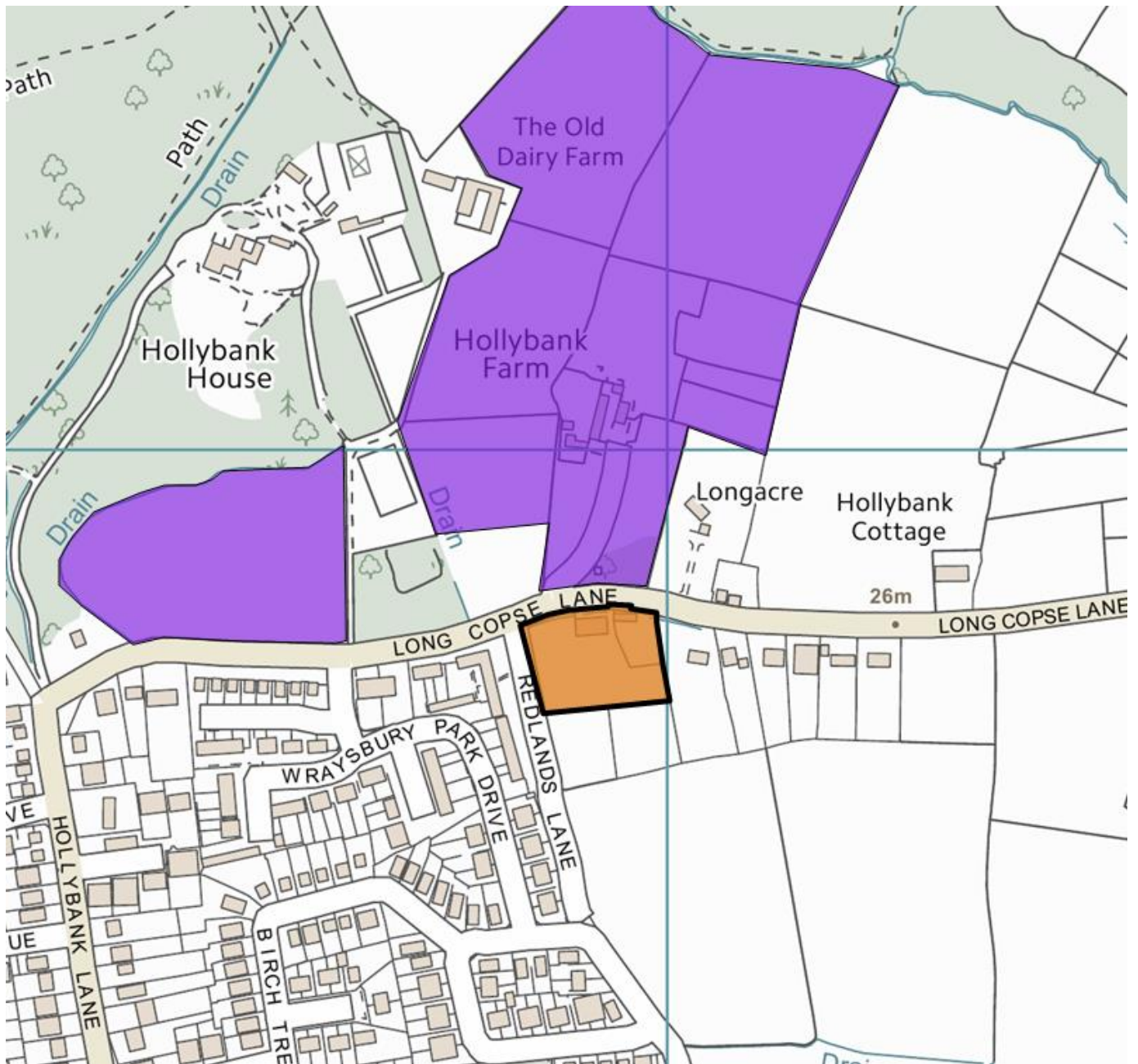
N.B. The Urban extension sites are in addition to sites in the Emsworth area that will have outstanding planning permission, may be allocated in the existing Local Plan but do not have permission plus an allowance for windfall development on small sites.



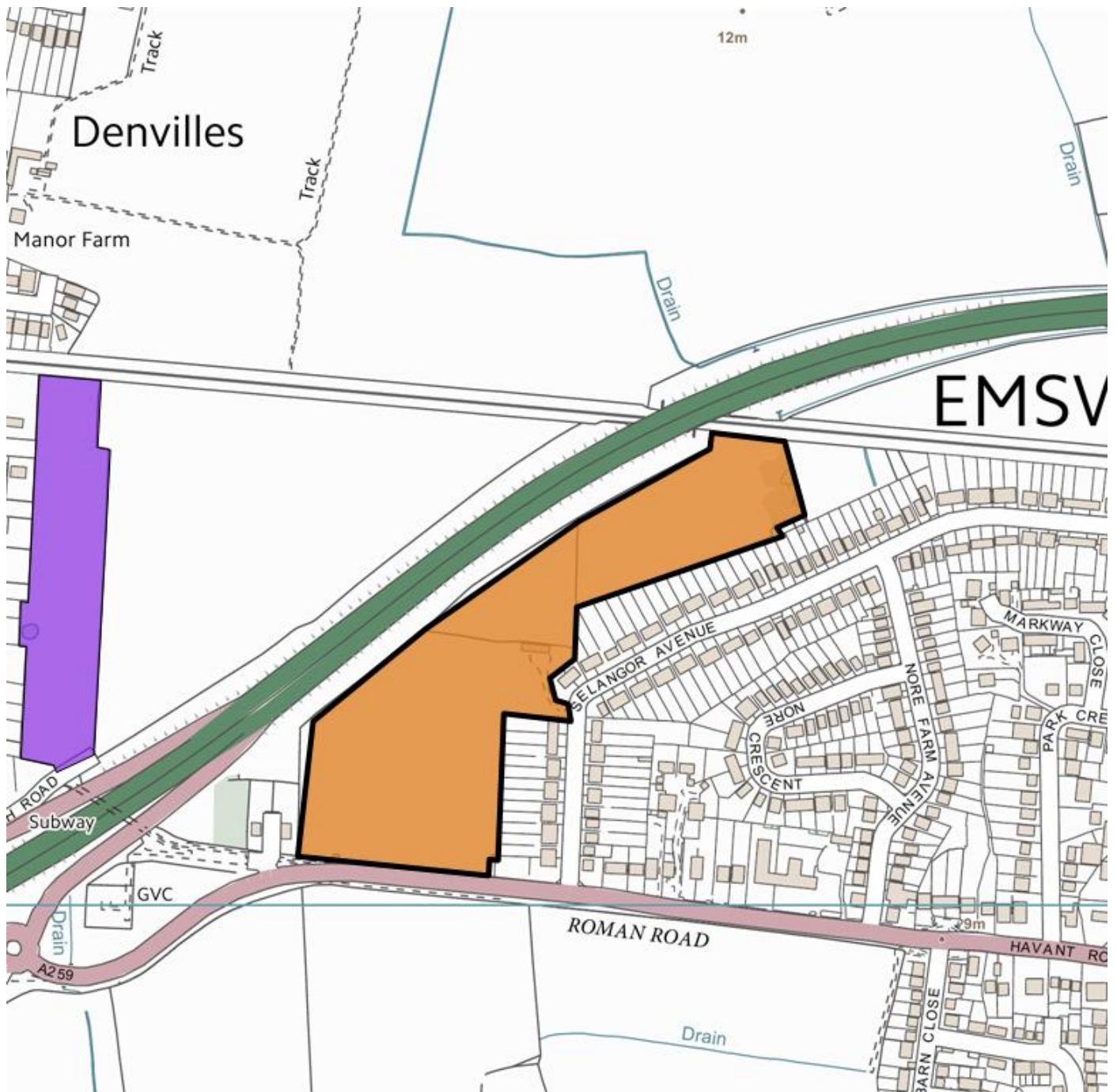
Land north of Hollybank Lane and Long Copse Lane (54)



Land north of Long Copse Lane (166)



Land to the rear of Redlands House (5)



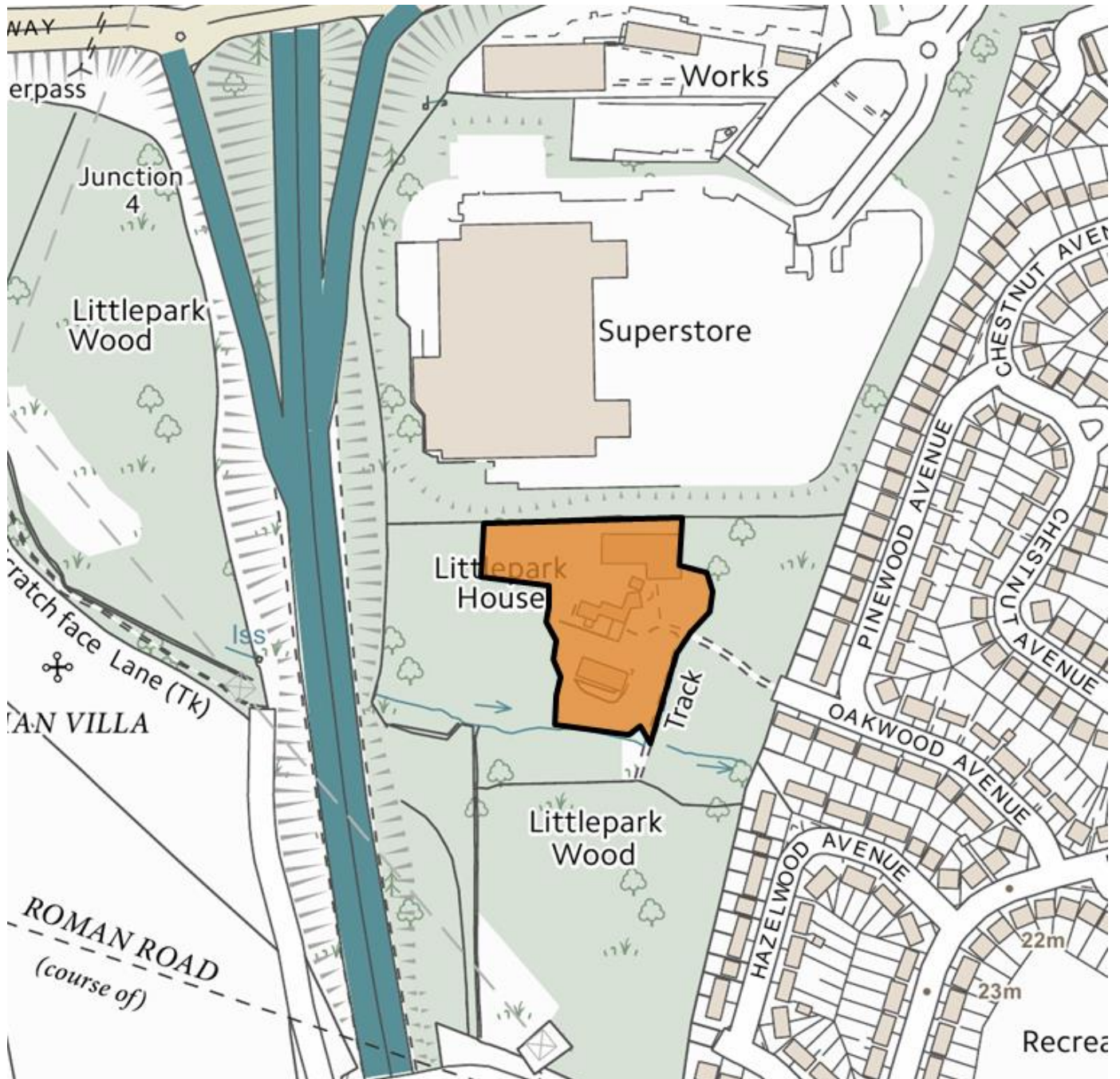
Land north and west of Selangor Avenue (154)

Havant & Bedhampton

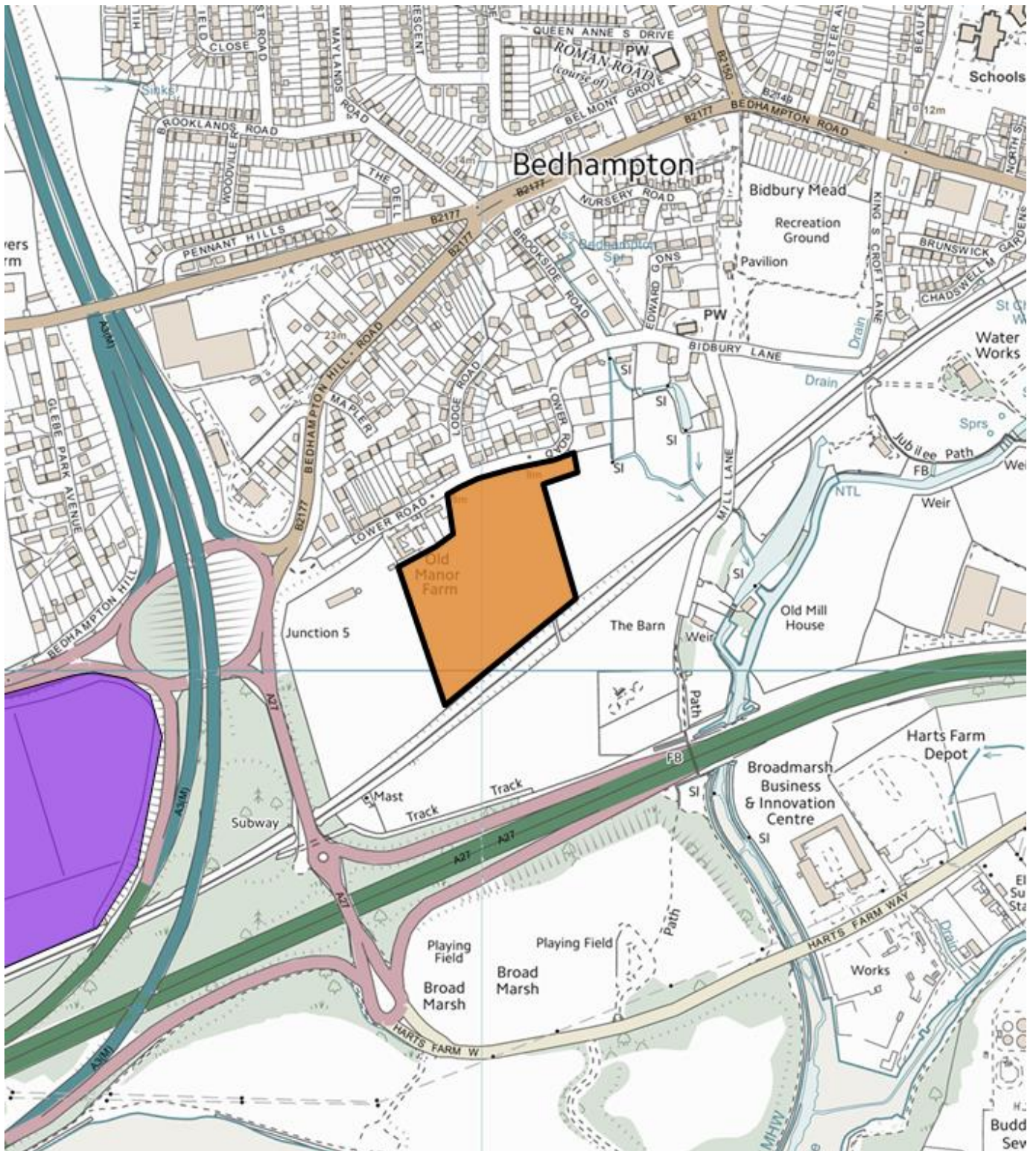
- Littlepark House, Bedhampton (47)
- Land south of Lower Road, Bedhampton (50)
- Land adj. 47 Portsdown Hill Road (5)
- Land east of Castle Avenue (60)
- Southleigh Park House (35)
- Forty Acres (300)

Total in Havant and Bedhampton: 497

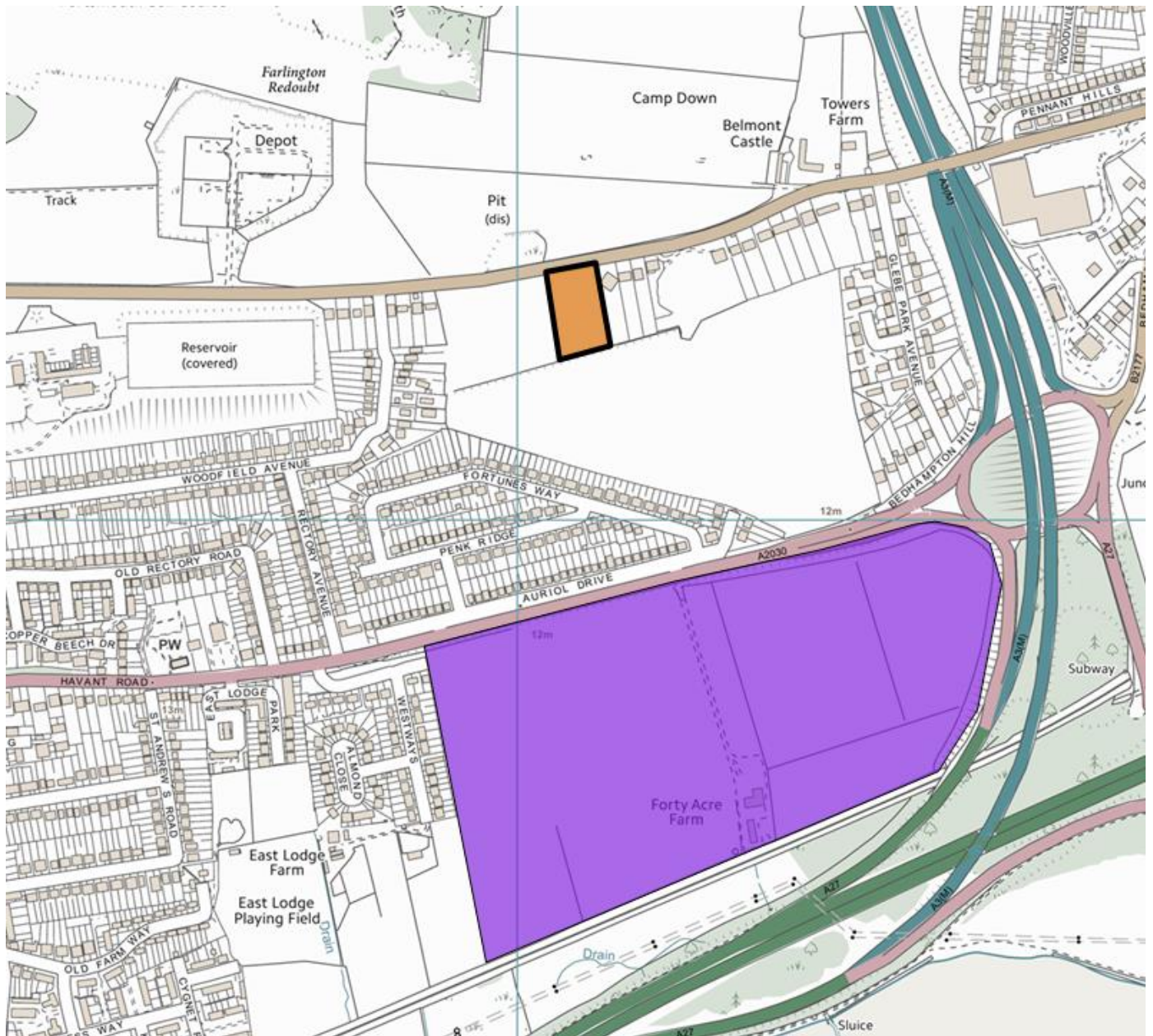
N.B. The Urban extension sites are in addition to sites in the Havant and Bedhampton area that will have outstanding planning permission, may be allocated in the existing Local Plan but do not have permission plus an allowance for windfall development on small sites.



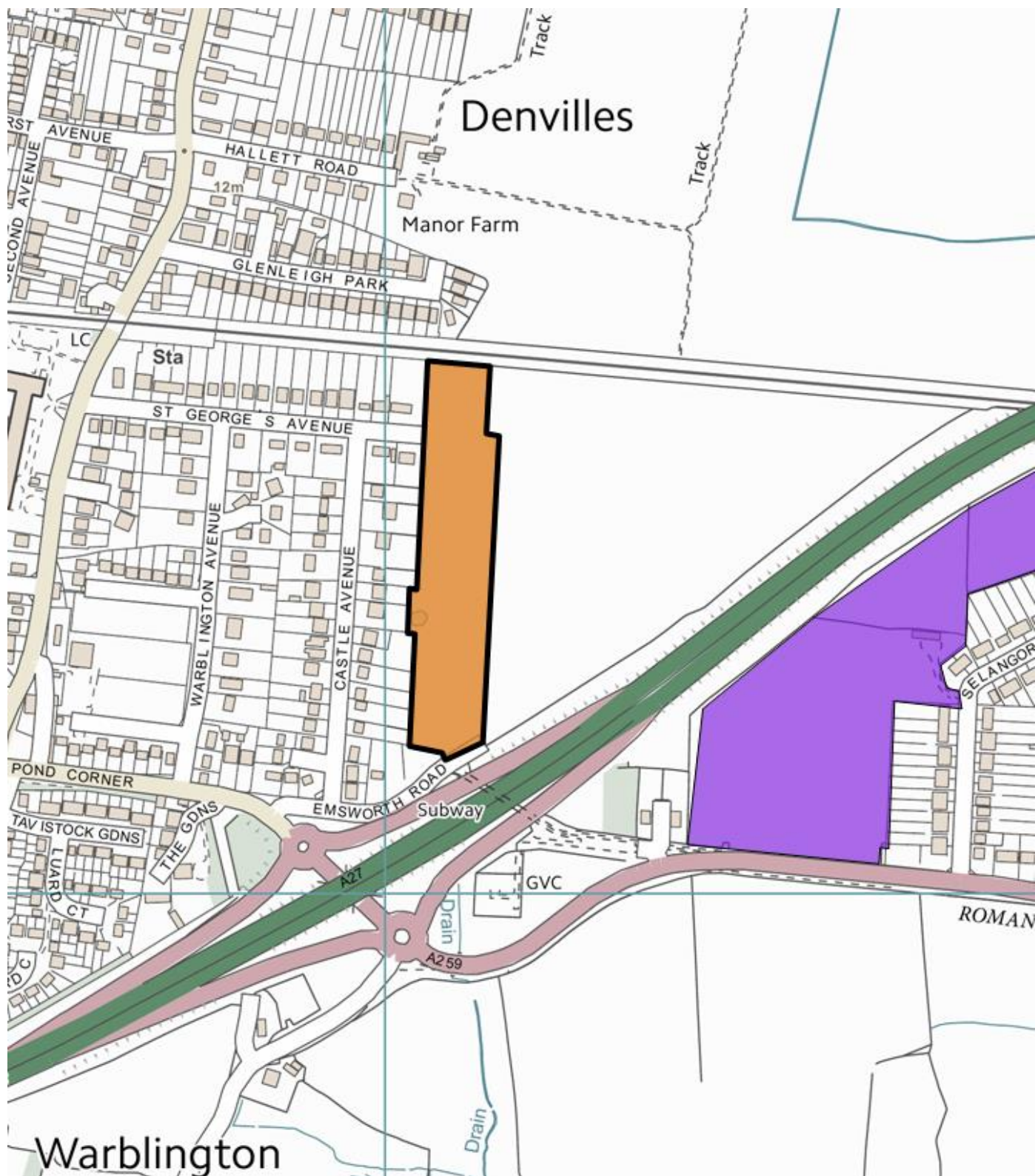
Littlepark House, Bedhampton (47)



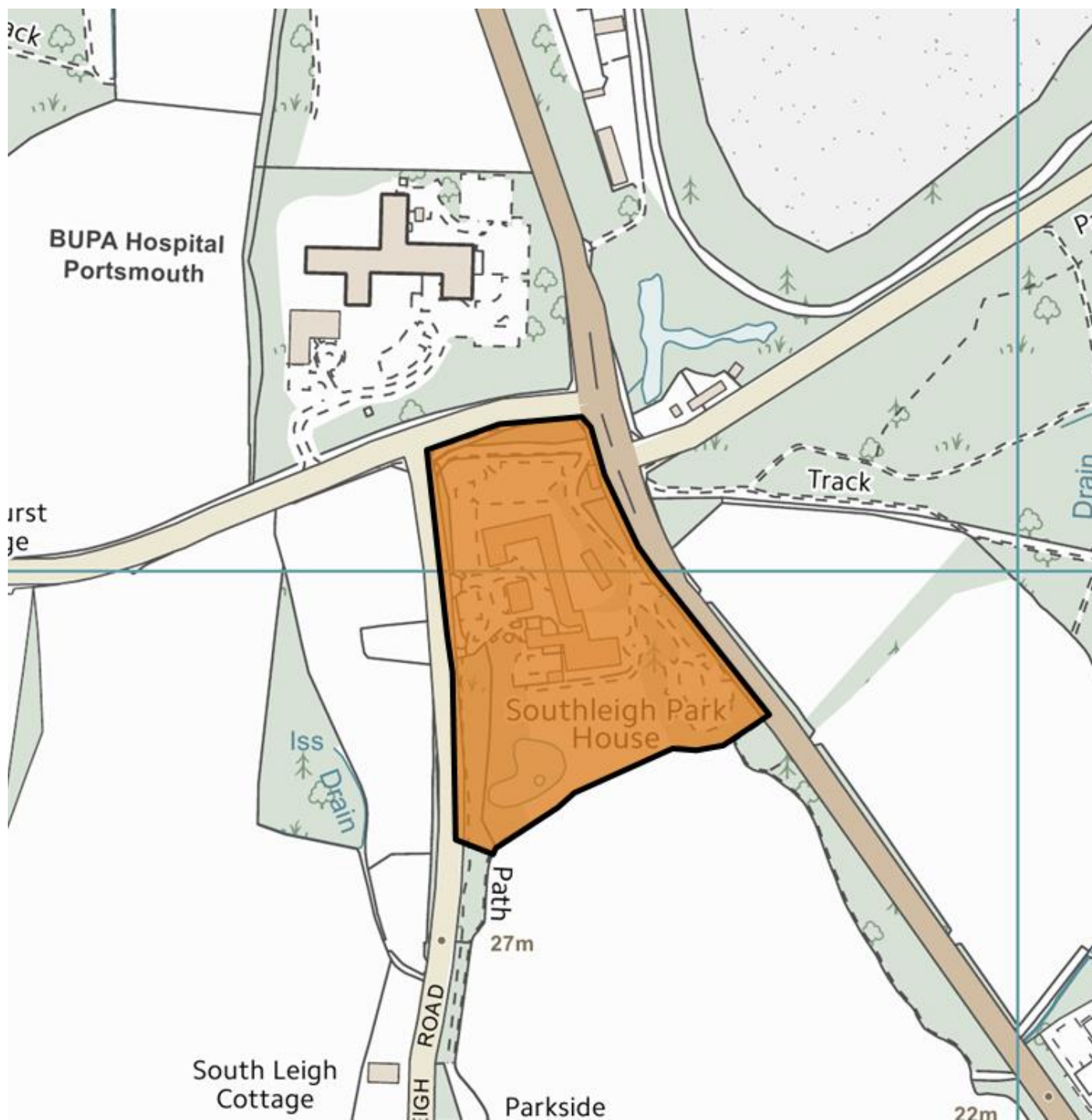
Land south of Lower Road, Bedhampton (50)



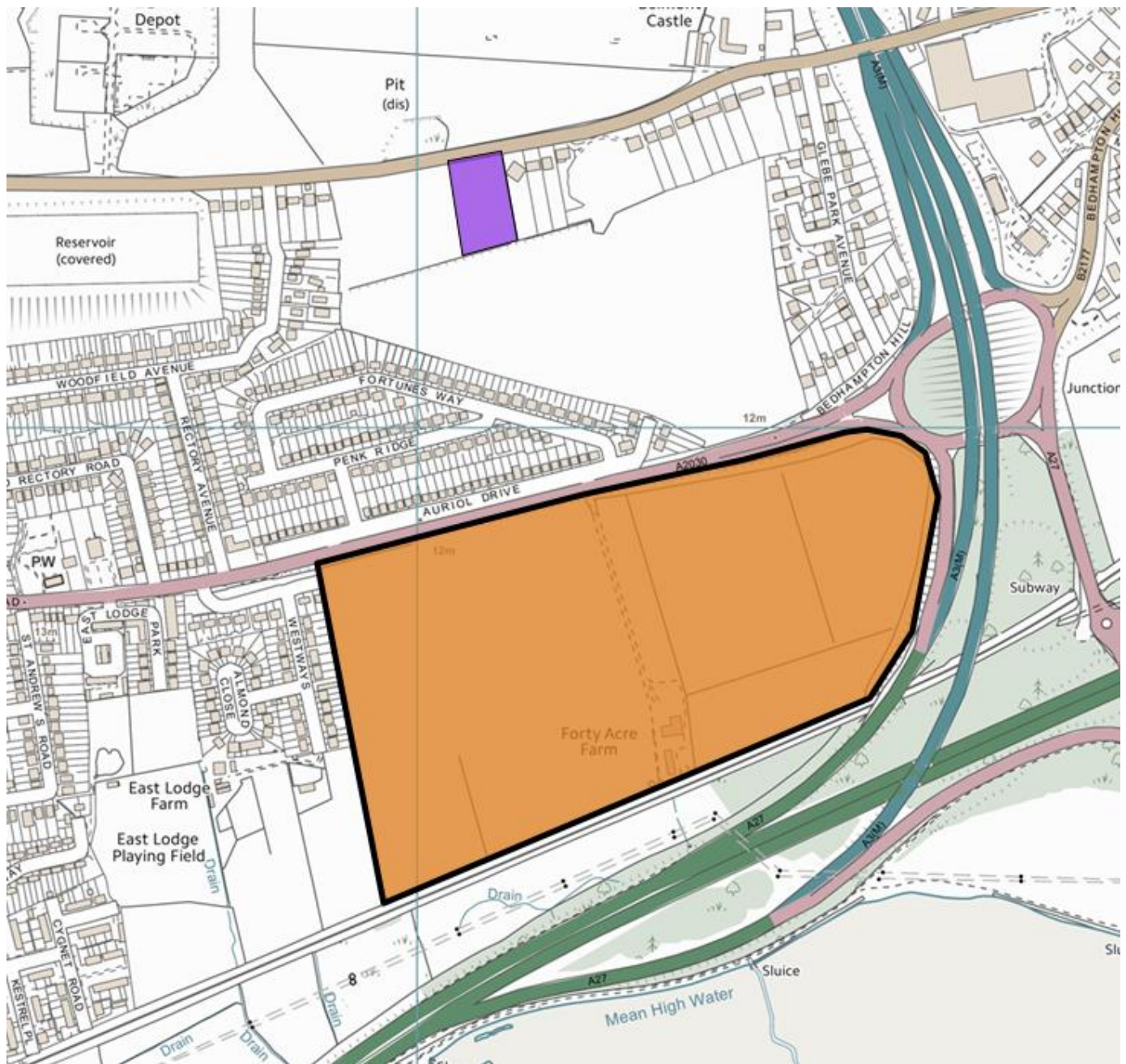
Land Adj. 47 Portsdown Hill Road (5)



Land east of Castle Avenue (60)



Southleigh Park House (35)



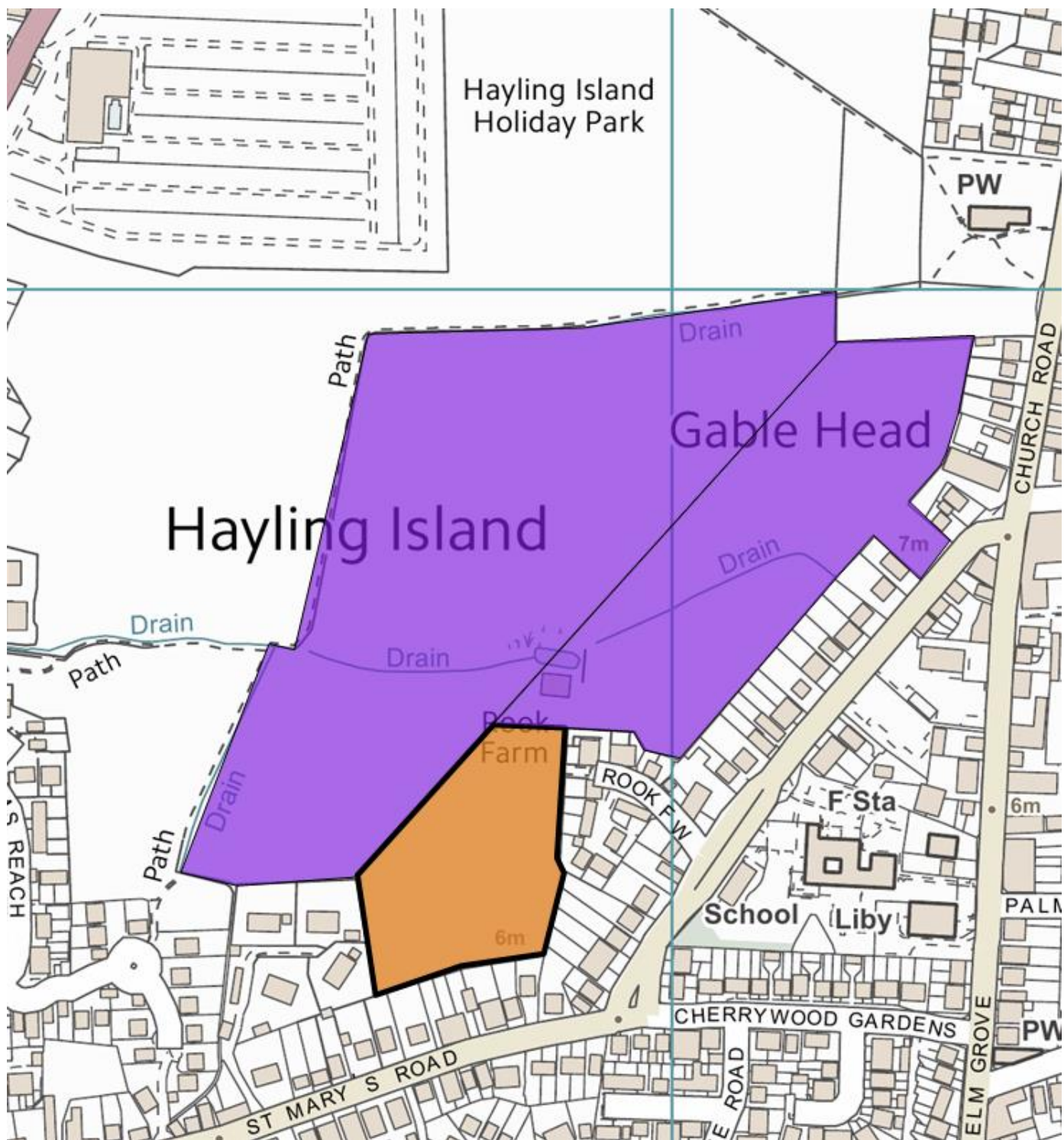
Forty Acres (300)

Hayling Island

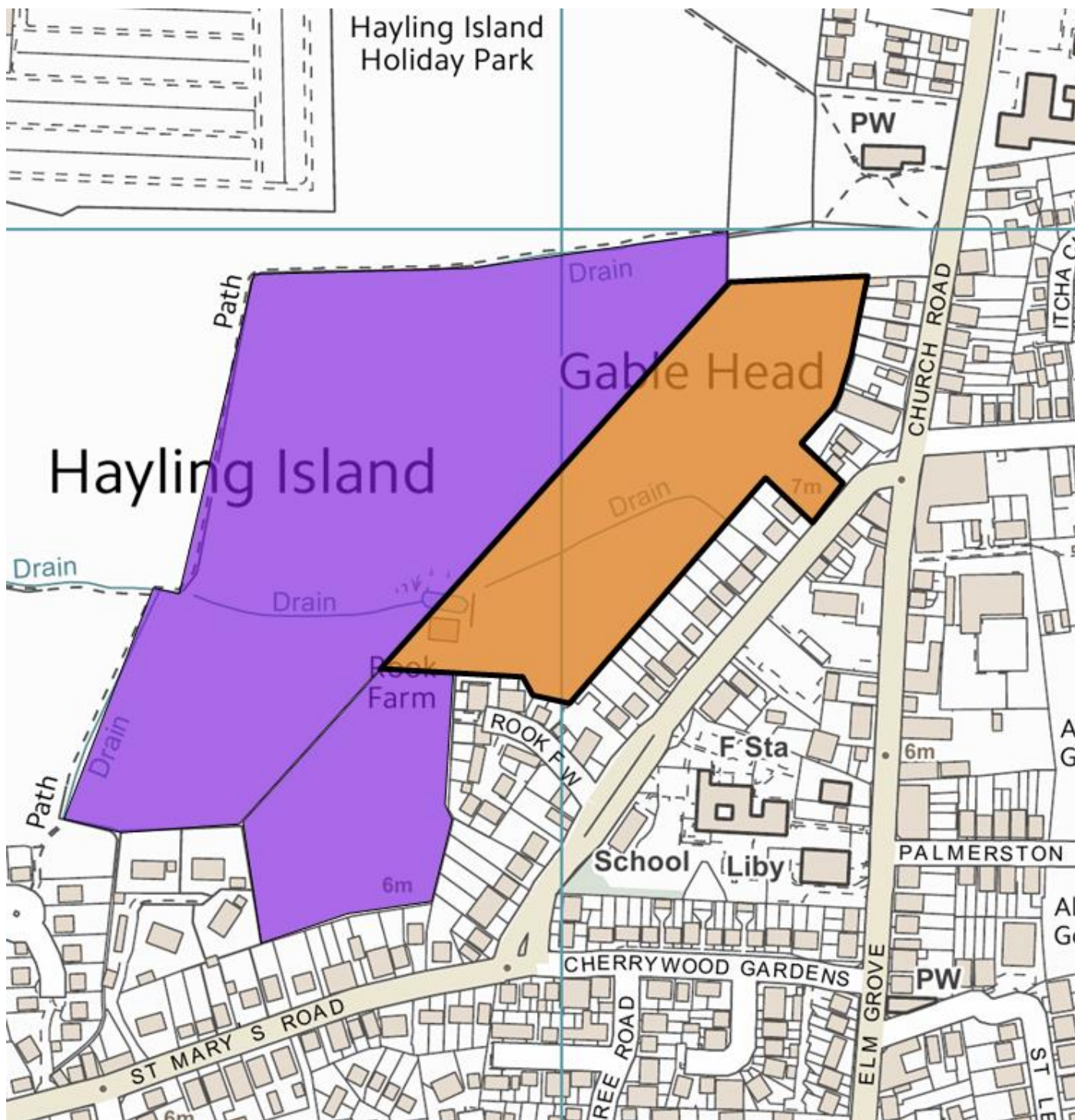
- Land South of Rook Farm (53)
- Land north of Rook Farm (119)
- Land west of Rook Farm (222)
- Station Road (north of Sinah Lane/west of Furniss Way (161)

Total on Hayling Island: 555

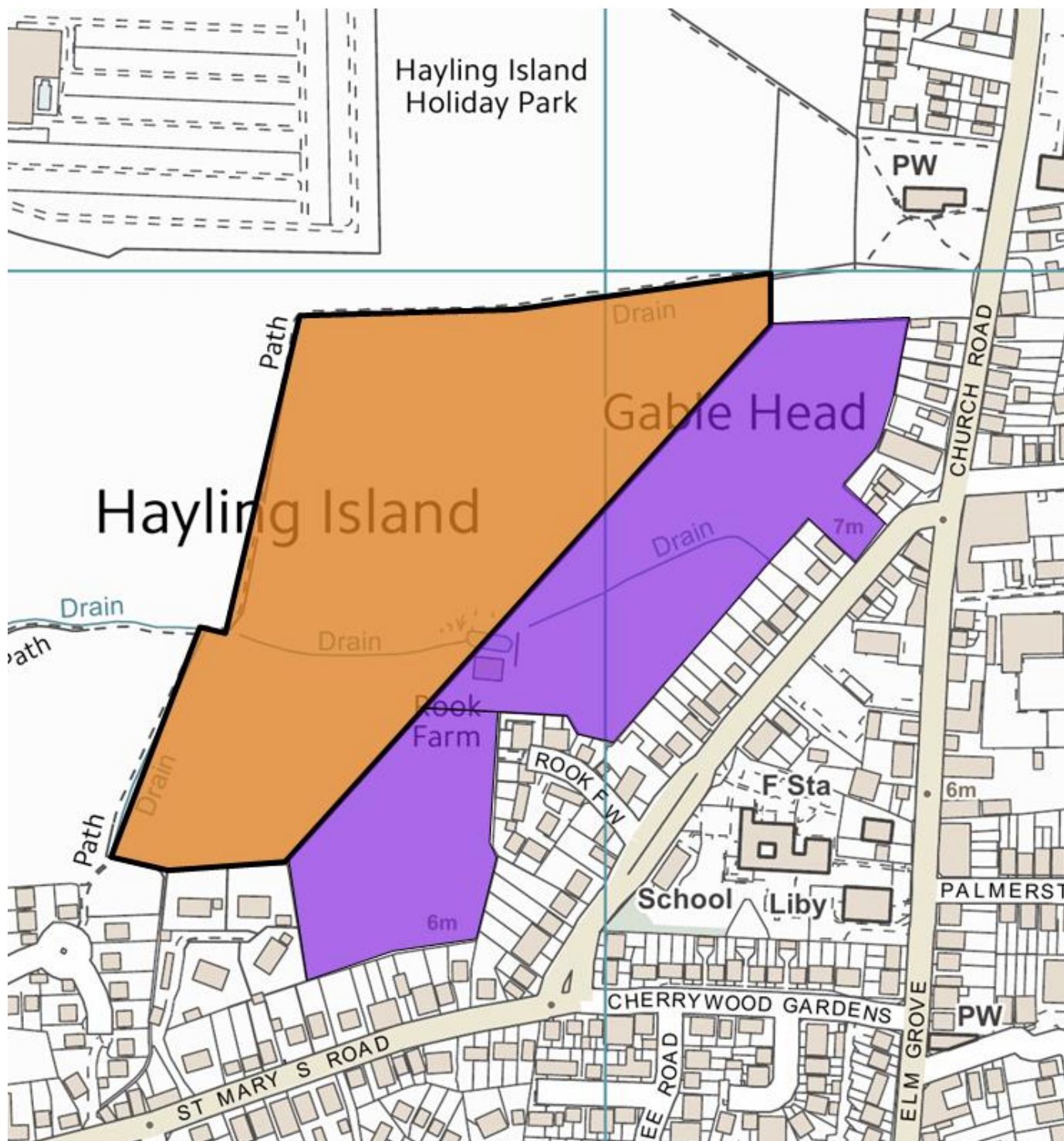
N.B. The Urban extension sites are in addition to sites in the Hayling Island area that will have outstanding planning permission, may be allocated in the existing Local Plan but do not have permission plus an allowance for windfall development on small sites.



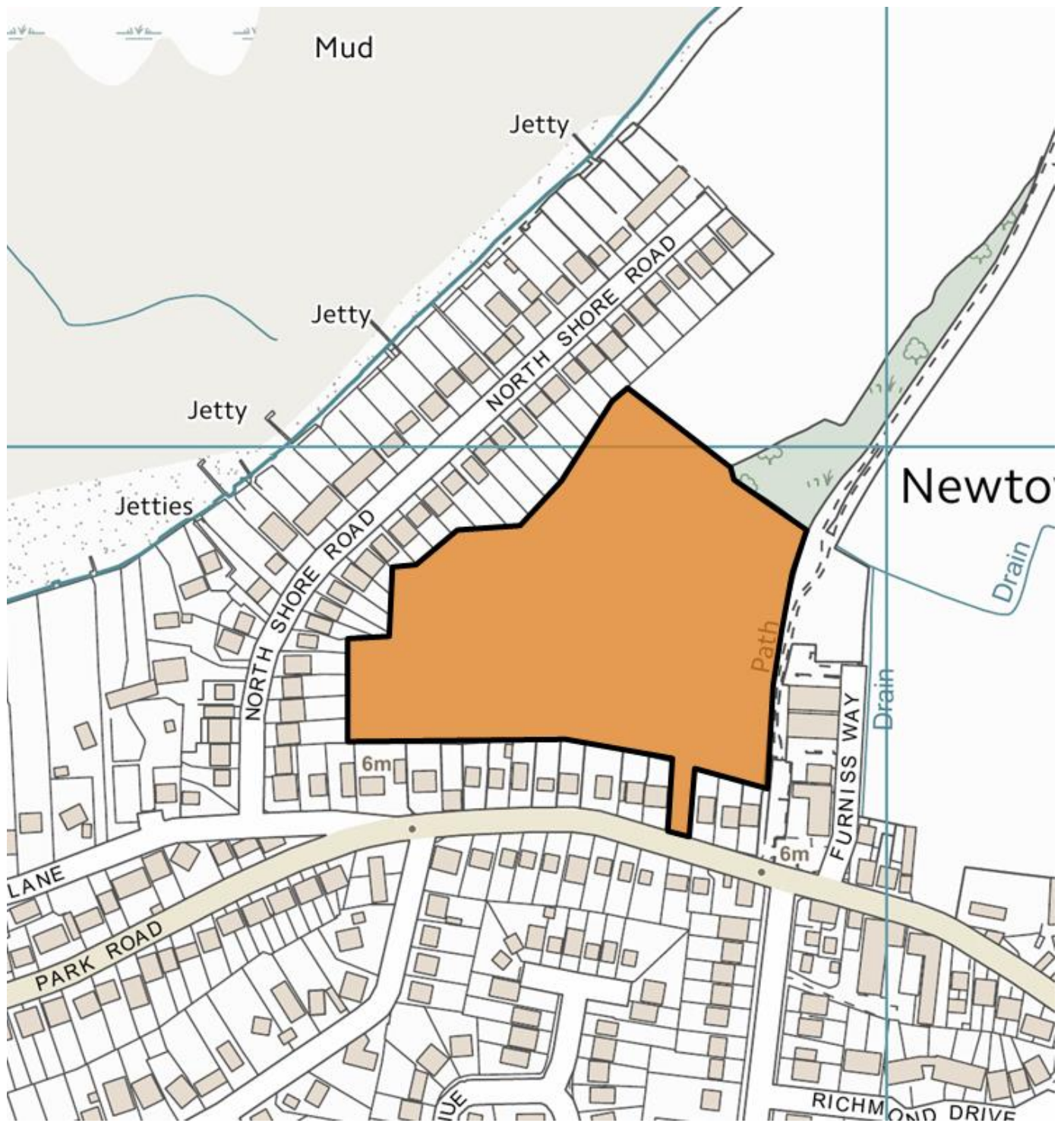
Land south of Rook Farm (53)



Land north of Rook Farm (119)



Land west of Rook Farm (222)



Station Road (north of Sinah Lane/west of Furniss way (161)

