

PLANNING APPLICATION RESPONSE OF PLANNING POLICY

Application No:	APP/21/00605
Site Address:	Forty Acres, Havant Road, Havant, PO9 3LW
Development:	Re-plan part of the residential area of the site to facilitate an additional 34 homes within the development area to create a total of 147 dwellings, inclusive of the 34 units
Case Officer:	Lewis Oliver
Comments by:	Jade Ellis
Date of Comments:	6 th August 2021

Policy Status: The [Local Plan \(Core Strategy\)](#) and the [Local Plan \(Allocations\)](#), together with the Hampshire Minerals and Waste Plan provide the development plan for the Borough. The [Havant Borough Local Plan](#) (HBLP) was submitted for Examination on the 12th February 2021 and must be afforded limited weight.

The following Adopted Local Plan policies are of particular relevance:

- CS9 – Housing
- CS16 – High Quality Design
- CS17 – Concentration and Distribution of Development within the Urban Areas
- CS19 – Effective Provision of Infrastructure
- CS21 – Developer Requirements
- DM6 – Coordination of Development
- DM10 – Pollution
- DM13 – Car and Cycle Parking in Residential Development
- DM23 – Sites for Brent Geese and Waders
- DM24 – Recreational Disturbance to Special Protected Areas (SPAs) from Residential Development
- AL1 – Presumption in Favour of Sustainable Development
- AL2 – Urban Area Boundaries and Undeveloped Gaps between Settlements

In the emerging Local Plan the following policies are of particular relevance:

- DR1 | Delivery of Sustainable Development
- IN1 | Effective provision of infrastructure
- IN3 | Transport and parking in new development
- IN4 | Future management and Management Plans
- H1 | High quality new homes
- H2 | Affordable housing
- H3 | Housing density
- H4 | Housing mix
- E1 | High quality design
- E2 | Health and wellbeing
- E3 | Landscape and settlement boundaries
- E12 | Low carbon design
- E16 | Recreational impact on Solent European Sites
- EX1 | Water Quality impact on Solent European sites
- E17 | Solent Wader and Brent Goose feeding and roosting sites
- E22 | Amenity and pollution

- H14 | Forty Acres

The application proposal seeks to increase the total units on the site to 354 dwellings representing an increase of 34 dwellings when compared to planning permission reference APP/18/00450. This would involve re-planning 105 previously approved units. It is noted that the public open space and winter bird mitigation area do not form part of this submission.

Principle of Development:

In the adopted local plan, the site lies outside of the urban area as defined by policies CS17 and AL2 of the adopted plan. These policies seek to restrict development in these locations, except in exceptional circumstances. None of the exceptions in the policy apply here, the proposal being a housing development on greenfield land.

The site is however, identified as a site allocation in the Submission Local Plan under Policy H14 which must be afforded weight in the determination of any subsequent application. Planning permission reference APP/18/00450 is also a material consideration.

The site is allocated for about 320 dwellings under Policy H14 in the Submission Local Plan. The pre-application proposals would increase the site capacity to 354 dwellings (an additional 34 units). In terms of density, this would result in an increase from 41 dwellings per hectare to 45dph. This is considered appropriate having regard to the way in which allocations are set at 'about' meaning site capacities are not deemed to be maximums or minimums. Furthermore, it is considered that the proposed revisions would maximise the use of the site in a sustainable manner.

Development Requirements:

Development proposals should be designed to meet the requirements in the Havant Borough Local Plan which can be afforded limited weight.

The full set of developer considerations can be found in the emerging allocation policy; please see Policy H14 in the Submission Local Plan.

The applicant has not submitted a Compliance Checklist to enable assessment of compliance with the requirements in the Local Plan. Comments on a number of elements are provided below, but these are not exhaustive.

Housing Quality:

HBLP Policy H1 indicate that new homes should meet appropriate internal space standards, provide sufficient private and/or communal outdoor amenity space, and schemes of 10 houses (gross) or more should provide 30% designed to enhanced accessibility and adaptability standards. In addition, schemes of 50 dwellings (gross) or more should provide 2% designed to wheelchair accessibility standards.

The extant planning permission of which 32% of dwellings (103 units) would comply with the Technical Space Standards is acknowledged. Based on the submitted accommodation schedule, it is estimated that a similar proportion (32.65%) would comply with nationally described space standards. It is also noted that the approved scheme does not include any dwellings designed to enhanced accessibility and adaptability standards.

Affordable Housing:

Policy CS9 of the Core Strategy together with emerging policy H2 in the Pre-Submission HBLP set out the affordable requirement for the site. Of particular relevance is the need for 10% of the total number of new homes (gross) should be provided as shared ownership (as part of the overall affordable home ownership).

The submitted Planning Statement indicates that of the 10 of the 34 additional units would be provided as affordable homes, equivalent to 29.94 affordable homes across the site. A financial contribution would be required towards off-site provision to offset the balance. In terms of mix, it is noted that there is an outstanding query from the Council's Housing Officer.

Housing Mix:

HBLP Policy H4 indicates that development proposals of 10 or more new homes (gross) will be expected to provide 35% two bedroom homes as part of the overall housing mix.

The submitted Planning Statement indicates the proposal would result in an overall reduction in the number and provision of 2 bed homes (by a count 4), decreasing the proportion from 29.9% to 21.4%. A significant increase is proposed in the number of 3 bedroom properties (by a count of 37), increasing the proportion from 56.5 to 66.1%.

Whilst this would result in a less than a non-policy compliant level of two bedroom properties, it would generally increase the number of 3 bedroom properties in Havant & Bedhampton. It is noted that existing built stock comprises 44% relative to 45.2% of need according to Figure 3 in the Council's Specialist Housing Paper. As such, a policy objection would be unlikely to be sustained on this basis.

Open Space and Brent Geese and Waders:

It is noted that the public open space to the south of the development site does not form part of the red line for this application.

HBLP Policy E9 indicates that proposals for residential development of 50 dwellings or more will be permitted where high quality on-site open space is provided to a standard of 1.5 ha per 1,000 population, an element of play is provided (where the open space requirement exceeds 0.5ha), and an element of community food growing provision is provided (to at least a standard of 0.2ha per 1,000 population).

Nevertheless, the proposals would result in an increase in the number of units and demand on the open space by the population generated from the development, particularly given the increase in the number of three-bedroom units. Based on the information submitted, it is not possible to assess the revised scheme's compliance with this policy. It is recommended the applicant provide information on the population generated by the development based on Table 5 of the [Submission Local Plan](#) and assessment of the scheme's compliance against Policy E9.

Other policy requirements:

In addition to the above, the scheme will need to comply with the following emerging requirements.

Policy	Requirement
Regeneration (Policy DR2)	A requirement for financial contributions towards accessing employment and skills training; and a community officer to help new residents integrate into existing communities. It is noted that a contribution towards a Community officer post was sought as part of the approved scheme.
EV Charging Infrastructure (Policy IN3)	Electric Vehicle charging infrastructure should be provided for each new residential unit with private off-street parking. It is noted the approved scheme provided electrical charging points for all private dwellings.
Low Carbon Design (Policy E12)	Residential development is expected to achieve a 19% reduction in Dwelling Emission Rate. It is noted that the applicant has previously objected to this Local Plan requirements, and did not meet this requirement as part of planning permission reference APP/18/00450.
Management Plans (Policy IN5)	A management plan is likely to be required through a legal agreement to establish the whole life management and maintenance of the common parts within the development. It is noted that a Management Plan is required for the maintenance of open space on the site.

Summary:

The principle of the development of this site is supported in policy terms, based on the emerging policy position in the Submission HBLP. The planning permission is also a material consideration. The increase in the site's capacity is also welcomed, particularly in the context of the Council's current housing land supply position. However, in the absence of a Compliance Checklist, there are various detailed matters e.g., affordable housing, housing mix, open space provision which need to be carefully assessed relative to the approved scheme.