

Planning Policy Position on Speculative Planning Proposals

Background:

The Council are likely to receive approaches relating to the potential development of unallocated sites in the forthcoming years. This arises from perceived uncertainty and varying interpretations of the coalition Governments, emerging National Planning Policy Framework (NPPF). The key points are around certain phrases in the draft NPPF:

1. The presumption in favour of sustainable development.
2. Granting permission where the plan is absent, silent, indeterminate or where relevant policies are out of date.
3. Decision-takers at every level should assume that the default answer to development proposals is 'yes', except where this would compromise the key sustainable development principles set out in this Framework.
4. Planning policies should avoid the long term protection of employment land or floorspace, and applications for alternative uses of designated land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses.

These phrases are being put forward by developers as a potential justification as to why their speculative development proposals should be allowed. This period of uncertainty provides a window for developers to test Council's resolve over the future planning of their area. This note provides advice on the position of the Council in relation to such approaches.

Position Summary:

The adopted Havant Borough Core Strategy (March 2011) promotes economic development and proactively seeks an 'open for business' approach to the future of the borough as a key objective. Together with the saved policies from the Havant Borough District-Wide Local Plan, the Local Plan provides a policy position on most aspects of development. At a strategic level the Local Plan sets out the development boundary for the Borough (Policy CS17) within which the default answer to the vast majority of development proposals will be 'yes'. Development proposals that fall outside of the current identified development boundary would be contrary to Policy CS17 of the Local Plan.

Sites within the development boundary that have no specific policy designation will continue to be positively considered on their merits taking into account the existing policy framework of the Council.

The Council will consider proposals for the development of sites allocated under a Saved Local Plan Policy for a particular use, such as employment, to be developed for alternative use. These proposals would need to comply with Core Strategy Policy CS2 that safeguards existing employment sites that are fit for purpose from alternative development proposals. All employment land allocations were the subject of a robust assessment in the 2010 Employment Land Review and this evidence will be used to guide decisions on whether the site should be retained as an employment allocation or released for other purposes.

Explanation:

The Council has a robust five year supply of deliverable housing sites (published in the 2011 Annual Monitoring Report). This supply makes up for the existing shortfall and also allows for flexibility of some 20%. The supply has been significantly aided by ongoing and projected development at the West of Waterlooville Major Development Area, permissions (including Hampshire Farm in Emsworth) and forthcoming proposals at Woodcroft Farm.

Another important aspect to consider is the role of the Localism Bill and its broad intentions. In early 2012 consultation will take place within the five areas of the borough to enable communities to have more say on which potential housing sites are taken forward for allocation. As progress towards the Council's Allocations Plan is well under way with a commitment to embracing local views and involvement, it would be inappropriate to prematurely consider proposals which would thereby remove the opportunity for local input in the decision making process.

Granting planning permission on an ad hoc basis as opposed to development properly being planned through the Local Plan/LDF system would also fail to consider accurately the cumulative impacts of sites and would make it difficult to secure appropriate development contributions and/or highway improvements.

Whilst the draft NPPF advocates a presumption in favour of sustainable development, allowing unallocated sites on an ad hoc basis could result in less sustainable or locally supported sites being permitted. Importantly it will also result in the credibility of the plan led system being undermined; contrary to the first core planning principle of the draft NPPF that 'planning should be genuinely plan led'.

The Allocations Plan is timetabled for adoption in late 2013. The monitoring of housing delivery and supply will be undertaken annually and in the event that future supply projections indicate a need to change the above approach then this will be considered on sound reasoning and the decisions taken will utilise the community engagement work to take place up until spring/summer 2012. This could include measures such as the early support/release of sites that have been most positively received through the public engagement processes and the sustainability assessment work that will be undertaken to support the progress of the Allocations Plan.

The Council will continue to positively consider proposals within the identified development boundary on their individual merits against adopted planning policies.

The Council believes:

1. It has a robust approach to permitting sustainable development.
2. It has a good and flexible five year supply of deliverable housing sites.
3. The Local Plan is up to date, relevant and the appropriate tool to determine development proposals.
4. The Local Plan default answer is 'yes' where it would not undermine the sustainable development principles of the Local Plan.
5. The community have an important role in the decisions made having regard to the 'localism' approach.

With the above matters in mind it is considered that the Council have good sound reasoning to resist speculative development proposals that fall outside the Local Plan Policy Framework.

Should you have any queries in relation to this Planning Policy Position Statement then please contact the Planning Policy and Urban Design team.

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