

**Planning Policy Comments: GE Aviation, Kings Avenue, Hamble-le-Rice, SO31 4NF**

**Application Reference: O/18/84191**

**Planning Policy Context**

**Saved Policies of the Eastleigh Local Plan Review 2001-2011**

The policies of the Adopted Local Plan were saved in May 2009 and retain significant weight as a material planning consideration in the development management decision making process until such time that the submitted Eastleigh Local Plan 2016-2036 is found sound and subsequently adopted.

**Emerging Eastleigh Borough Local Plan 2016-2036**

The Regulation 19 version of the Draft Local Plan as published in June 2018 was submitted to the Secretary of State on 31<sup>st</sup> October 2018 for independent examination. Whilst the weight that can be given to the draft policies of the submitted Local Plan is limited, it should be further noted that this weight has increased slightly following its submission for independent examination. The policies of the submitted 2011-2029 Local Plan are not referenced since they can be afforded very limited weight.

**National Planning Policy Framework – July 2018**

The NPPF 2018 is a material consideration in determining planning applications alongside the saved policies of the Adopted Local Plan 2001-2011 which are considered to be in conformity.

**Planning Policy Comments**

Comments are provided on countryside, employment, open space, sports pitch, affordable housing / housing mix and five year housing land supply matters.

**Countryside and Urban Edge**

Most of the application site is located in an area designated as countryside both regards to the saved policies of the Adopted Local Plan 2001-2011 and the submitted Local Plan 2016-2036.

It is stated in saved Policy 1.CO of the Adopted Local Plan 2001-2011 that planning permission will not be granted for development outside the urban edge unless one of the included criteria is met. It is clear that the intentions of the policy are to refuse inappropriate development in such locations. Criterion iv does however state that 'planning permission will not be granted for development outside the urban edge unless...it meets the criteria in the other policies in this plan'.

Strategic policy S7, New development in the countryside within the submitted Local Plan 2016-2036 also makes clear that the intention of this policy is to prevent inappropriate development in the countryside through which the policy sets out a presumption against new development in the countryside, subject to the policies of this (i.e. the submitted) Local Plan.

Notwithstanding other material planning considerations, it is therefore clear from the outset that saved policy 1.CO and emerging strategic policy S7 that major residential development would not be appropriate on this site.

The proposal would also result in development beyond the existing urban edge and would redefine the urban edge in this location although would not result in the any encroachment of any adjoining settlement or urban coalescence. In addition, the existing characteristics of the site arguably do not provide for an open rural setting with it being predominantly used and developed for sport and recreation. This character is therefore similar to the existing open space designation located directly to the north (Mount Pleasant Recreation Ground) which is in contrast to more open countryside character such as that found to the north of Hamble Station.

### **Existing Employment Use**

It is stated in the Design and Access Statement that the proposal would result in the demolition of redundant factory buildings. Saved Policy 118.E of the Adopted Local Plan 2001-2011 is therefore relevant to consider which states that the redevelopment or change of use of an existing employment site, or the development of an allocated employment site, as identified on the proposals map, for uses other than B1, B2 or B8 employment purposes will only be permitted if one of two noted criteria are met. Criterion i is of particular relevance in this instance whereby it's stated that such proposals will only be permitted if it does not, either by itself or cumulatively with other changes on the same employment site adversely affect the employment base either by markedly reducing the potential choice of employment in the local area or by significantly reducing the range and variety of premises or sites available for employment purposes within the local area.

Emerging Policy DM15, Safeguarding existing employment sites of the submitted 2016-2036 Local Plan further states that the major existing employment sites as identified on the policies map shall be retained predominantly in employment use classes B1, B2 or B8.

It is also clear from the information that has been submitted that the employment operations of the site will remain intact alongside modernisation and efficiencies that will take precedence within the core of the site which will help the business to remain competitive. The applicant has attempted to justify the need for the proposal in terms of the net benefit this would have upon providing an effective and efficient site and business that is able to operate sustainably and viably moving forward.

Information has also been provided by the applicant stating that the proposal would retain the existing level of employment so would not result in a net reduction in jobs, this therefore being compliant with criterion i of saved policy 118.E of the Adopted Local Plan 2001-2011.

### **Open Space Provision as part of New Development**

Whilst two main indicative areas of public open space are shown on the information and plans submitted with this outline planning application, no information has been submitted to quantify the amount (i.e. in hectares). Saved Policy 147.OS seeks appropriate on-site provision to meet the open space needs arising from the development and that this should be a minimum provision of 2.85 hectares of public open space per 1,000 of the population. The equivalent provision for a development of this size (assuming 1 dwelling = 2.4 residents) would require an equivalent provision of circa. 1.01 hectares of open space.

Policy DM35 'Provision of recreation and open space facilities with new development' of the submitted Local Plan 2016-2036 states that all new residential development should contribute to the

achievement of quantitative, qualitative and accessibility standards for recreation and open space facilities in the Open Space Needs Assessment 2017. Figure 8 'Open Space Standards 2017' includes further information on the quantity standards that could be expected. It is observed that the amenity and allotment space required to serve residents in Bursledon, Hamble and Hound would exceed that required per 1,000 of the population including by 2036. Notwithstanding this, the scheme will be expected to make provision of an appropriate amount of open space to serve prospective residents.

In terms of the location of the proposed open space, the provision of an area of amenity space / LEAP to the front and north of Sydney Lodge would help to enhance the setting of this Grade II Listed Building.

Whilst the following would go over and above the requirements of criterion iii of policy 147.OS of the Adopted Local Plan 2001-2011, it may also be appropriate to consider the existing provision adjacent to the site at Mount Pleasant Recreation Ground with these proposals whereby consideration should be given to the collection of developer contributions for any improvements. Similarly, consideration should also be given to whether the applicant should provide developer contributions towards schemes outlined in the October 2018 Infrastructure Delivery Plan Update (for example, contributions towards widening the Hamble Station footway / cycleway). Whilst these suggestions are in addition to existing policy requirements relating to on-site open space provision, this could help to provide an additional benefit of the scheme which, if approved would constitute a departure from both the saved policies of the adopted Local Plan 2001-2011 and emerging policies of the submitted Local Plan 2016-2036.

In addition to the comments made above, the Urban Design and Landscape Specialist may also have further comments on the acceptability of the proposed open space.

### **Outdoor Sports Provision**

Whilst the site is not designated as existing open space within either the Adopted Local Plan 2001-2011 or the emerging Eastleigh Local Plan 2016-2036, it does provide for sports facilities which includes the provision of an existing cricket pitch, football pitch, bowls club and facility which accommodates a sports and social club. The pitches and associated facilities have also been included and assessed as part of the Council's Playing Pitch Strategy Update 2017.

It is noted that existing clubs make use of the outdoor sports facilities hence the submission of a Playing Pitch Mitigation Strategy in support of the outline proposals due to the impact it would have upon this existing sports provision. The proposed retention of the Follands FC football pitch along with new changing facilities and a stand of sufficient size to meet FA Step 5 specifications along with the proposed retention and improvements of the existing bowling club are welcomed.

However, the cricket pitch and two adult 11v11 grass pitches would be lost to the residential development proposed on the site. The proposed mitigation for this is a 3G pitch possibly at VT Sports Ground, a replacement cricket pitch at College Playing Fields and a possible new cricket pitch in Fair Oak where there is the greatest level of identified need as identified in the 2017 PPS Update.

The proposed replacement and alternative provision would need firm guarantees of being delivered if the proposed development is to be considered acceptable with regards to the outdoor sports

provision mitigation element of the proposals. However, if these guarantees are provided, this proposed replacement provision would be considered acceptable against emerging policy DM34, Protection of recreation and open space facilities if the pitches are to be of an equivalent or better standard in terms of quantity and quality.

For completeness, paragraph 97 of the 2018 NPPF is also relevant to consider whereby it states that existing open space, sports and recreational buildings should not be built upon unless at least one of three noted criteria are met. Criterion b is of particular relevance whereby it's stated that the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.

In addition to the comments made above, it is understood that the Council's Sport Works Project Manager and Sport England have made comments which address the acceptability of the proposals.

### **Housing Land Supply**

The housing requirement figure within the Eastleigh Local Plan Review 2001-2011 is out-of-date. For decision making, the presumption in favour of sustainable development applies to applications involving the provision of housing in "situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites". The Council's latest five year housing land supply position as at March 2018 is 5.52 years. This is expected to increase further on the application of the Government's Housing Delivery Test method. Therefore, the issue of housing supply and under delivery is not a material consideration in the determination of this outline planning application.

### **Affordable Housing Provision and Housing Mix**

The scheme is proposing 20.3% affordable housing as part of the development. This constitutes 30 units out of the 148 units proposed. This falls somewhat below the target of 35% affordable housing in policy 74.H of the Adopted Local Plan 2001-2011 and a requirement for this proportion of affordable housing as per policy DM30 within the submitted Local Plan 2016-2036, Delivering affordable housing within the Emerging Local Plan 2016-2036. This will need further consideration along with the proposed housing tenure mix if the principal of residential development on the site when considering all other material planning considerations, is deemed acceptable.

### **Concluding Comments**

The designation of this site as countryside as per saved policy 1.CO of the Adopted Local Plan 2001-2011 and strategic policy S7 of the submitted Local Plan 2016-2036 indicates that the proposed development of this part of the GE Aviation site for residential purposes wouldn't be acceptable. Therefore, any decision to grant approval would constitute a departure from the policies of the Adopted Local Plan 2001-2011 and would not in accordance with the proposed development strategy of the submitted Local Plan 2016-2036. In addition, the presumption in favour of sustainable development does not apply in this instance with the Council having a housing land supply comfortably above the required 5 years.

Paragraph 38 of the 2018 NPPF states that local planning authorities should approach decisions on proposed development in a positive and creative way.....and should work proactively with applicants

to secure developments that will improve the economic, social and environmental conditions of the area. Taking this into account, there are noted to be some exceptional circumstances to consider with this proposal in determining whether a departure from the existing and proposed countryside designations outside of the urban edge could be justified whereby the detrimental effects of allowing permission would be outweighed by the potential benefits:

1 – Whether the retention of a major employer within this part of the Borough would serve a wider public interest in retaining jobs, including the wider economic base through work offered to contractor firms in the local area.

2 – Whether the proposed sports pitch mitigation and enhancements would result in a net benefit in such provision for the local community and whether the alternative and replacement provision can be guaranteed / secured.

3 – Whether the proposed open space would meet both the existing and proposed quantity standards and whether it has been appropriately designed into the proposed scheme.

Whilst the planning policy team would normally object to such a proposal due to the conflict it has with both the adopted and submitted Local Plan, the unique factors that require consideration in this instance are recognised. Therefore, there is no objection to this proposal provided the comments are taken into account and identified issues are addressed.