

Planning Policy Position on Speculative Development Proposals

Background:

The Council is 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 Government's, 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 Granting permission where the plan is absent, silent, indeterminate or where relevant policies are out of date.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 the Council's resolve over the future planning of its area. This note provides advice on the position of the Council in relation to such approaches.

Position Summary:

The saved policies in the East Hampshire District Local Plan: Second Review provide a policy position on most aspects of development. At a strategic level the Local Plan identifies settlement policy boundaries (Policy GS2) within which the default answer to the vast majority of development proposals will be 'yes'. Development proposals that fall outside the current identified settlement policy boundary (i.e. in the countryside) would be contrary to Policy GS3 of the Local Plan.

Sites within the settlement policy 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 Local Plan policy for a particular use, such as employment, to be developed for alternative use. These proposals would need to comply with Local Plan Policy IB4 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 Employment Land Review (Jan 2012) 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) that includes an element of flexibility. In the southern part of the District the supply has been significantly aided by the release of the Local Plan reserve housing sites in that area.

Another important aspect to consider is the role of the Localism Act and its broad intentions. The Joint Core Strategy is due to be adopted in December 2012. It sets out a revised policy position on the scale of development proposed in various towns and villages to meet housing, community and economic needs up to 2028; it is not site specific (with the exception of the Whitehill Bordon Eco-town). Work will commence on a Development Allocations Plan in September 2012. The scale of new development proposed as allocations will have to comply with the scale of development set out in the Joint Core Strategy. Community engagement will take place in the main settlements in the District to enable communities to have more say on which potential sites should be taken forward for allocation. As there is a commitment to progress the Allocations Plan in the near future, and to embrace 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 being planned properly through the Local Plan system would also fail to consider accurately the cumulative impacts of sites. In addition, it 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 document is timetabled for adoption in early 2015. 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 during 2013. This could include measures such as the early support/release of sites that have been most positively received through the community engagement processes and the sustainability assessment work that will be undertaken to support the progress of the Allocations document.

The Localism Act allows for the preparation of Neighbourhood Plans by local communities. These Plans can include allocations for new development that must, as a minimum, match the scale of development proposed in the Joint Core Strategy. In some areas, therefore, the release of sites for development could follow from the adoption of a Neighbourhood Plan prepared by the

local community rather than the adoption of the Council's Development Allocations Plan.

The Joint Core Strategy sets out the overall scale of development proposed at the Whitehill Bordon Eco-town and the overall area of land to be used. This is effectively a strategic allocation and will be complemented by a supplementary planning document to set out in more detail the form of the new development and how it should be distributed around the already allocated site. The supplementary planning document is scheduled for completion in June 2013. Planning applications will be assessed against the policies on Whitehill Bordon in the Joint Core Strategy and the supplementary planning document.

The Council will continue to positively consider proposals within the identified settlement policy 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 remains 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 has 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 team.

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