

Rook Farm – Land off St Mary’s Road, Hayling Island (APP/21/01434) Summary of Consultee Responses & GDL Response

Consultee	Date of Response	Consultee Comments	GDL Response
HCC Specialist Environmental Services (Archaeologist)	24/01/2022	No Objection. Site has moderate potential for previously unrecorded archaeological remains dating to the later prehistoric or Roman periods, with lower potential for early-medieval/medieval remains. Recommended that a programme of archaeological investigation be secured through condition.	Noted. GDL are agreeable to an appropriate/suitably worded condition being attached to the outline planning permission to deal with archaeological matters.
Hampshire Fire and Rescue Service	26/01/2022	No Objection. Access/facilities for Fire Service Appliances and Firefighters should be in accordance with Approved Document B5 of the current Building Regulations. Access to the proposed site should be in accordance with Hampshire Act 1983 Sect, 12. Access roads to the site should be in accordance with Approved Document B5 of the current Building Regulations.	Noted. If approved, the development will be delivered in accordance with relevant Building Regulations and other mandatory standards where required.
DLUHC	26/01/2022	No Objection. Acknowledge receipt of ES and have no comments to make.	Noted.

HCC Flood and Water Management Team (LLFA)	01/02/2022	No Objection. Recommend conditions requiring further information on the detailed surface water drainage scheme for the site and maintenance arrangements of the surface water drainage system.	Noted. GDL are agreeable to appropriate/suitably worded condition/s being attached to the planning permission to deal with surface water drainage matters.
HBC Community Infrastructure Officer	02/02/2022	No Objection. Outline application not CIL liable, but any subsequent full or reserved matters application would be. S106 to include: - Affordable Housing - HBC Monitoring Fees - HCC Monitoring Fees - Management Company and Management Plan (may include SUDS) - Solent Recreation Mitigation Strategy - Nutrient Neutrality - SUDS/SUDS Bond - Community Worker - Employment and Skills Plan - Potential onsite Ecological Mitigation - Education (HCC) - Travel Plan (HCC) - Site Specific Transport Improvements (HCC) - Others arising out of consultee responses	Noted. GDL would be agreeable to entering into a Section 106 Legal Agreement to secure necessary planning obligations, subject to such obligations meeting the tests of Regulation 122 of the CIL Regs. We reserve the right to review any further requests for developer contributions made by consultees, with reference to the suite of potential obligations listed in HBC's Community Infrastructure Officer's comments.

Ramblers Association	03/02/2022	Proposed development will likely have a significant impact on the local environment and character and appearance of the area, as well as on the experience of people using the nearby footpaths. Ask that due consideration is given to how the existing footpath network relates to the new development and that connections to the existing footpath network are provided in a coordinated fashion, and that new tree planting respects the existing character of the area.	The effect of the proposals on the character and appearance of the area has been assessed as part of the planning application submission. It is considered that the application site and surrounding area can successfully accommodate a development of the nature and type proposed. No PROWs that cross the site. Three PROWs, however, run along the site boundaries, 108/93/1 passes along the site's northern boundary, while 108/94/1 and 108/92/2 run down the site's western boundary. These two PROWs merge into footpath 108/92/1 which passes west to Manor Road. The proposed scheme will retain and protect the existing PROW network, with the PROWs immediately adjacent to the site separated from the proposed development by a substantial green buffer (including new tree planting). Two new connections into the PROW network are proposed as part of the development. One connection will link to PROW 108/92/2 to the west and other will link to 108/94/1 to the southwest. This will help to improve permeability within the area. Chapter 11 of the submitted ES addresses the potential impacts of the proposed development on the PROW network. It concludes that the proposed development will have a negligible impact on the PROW network surrounding the site, both during the construction, operational and demolition phases.
----------------------	------------	---	--

			New tree planting is expected to be designed to be in keeping with the landscape character and appearance of the area, as well as contribute towards net gains in biodiversity. Appropriate boundary treatment and landscaping can be secured by condition.
HCC Traffic Management Team	08/02/2022	No objection. Requested sum of £5,000 (plus additional costs) to allow a TRO to be processed ending 5 years from the practical completion of the development.	Noted. GDL are agreeable to entering into a Section 106 Legal Agreement to secure planning obligations that are necessary to make the development acceptable in planning terms, subject to such obligations meeting the tests of Regulation 122 of the CIL Regs.
Historic England	10/02/2022	Comments remain as per previous response to application APP/17/00007. Notes that a low level of harm would be caused to the significance of the Grade II* listed Church of St Mary, referring to the requirements of the National Planning Policy Framework on balancing this harm against the public benefits of the proposals.	The relationship between the application site and the Church of St Mary has been assessed with the submitted Heritage and Archaeological Assessment. This concludes that the development of the application site has the potential to cause minor harm to the significance of this heritage asset, which is clearly less than substantial. The development proposals have been purposefully designed to include a view corridor towards the church, with development also excluded from the north-western area of the site, which will be delivered as open space. These design measures also align with the feedback provided by Historic England in relation to the Council's now withdrawn Local Plan.

			Having regard to paragraph 202 of the National Planning Policy Framework, it is considered that this less than substantial harm will be outweighed by the public benefits of the proposals.
HBC Housing Officer	11/02/2022	No objection. Proposal to provide at least 30% affordable housing onsite, with details of the affordable housing mix to be agreed with the Council prior to the submission of any Reserved Matters application.	Noted. GDL would be agreeable to securing 30% affordable housing onsite through a Section 106 Legal Agreement. A requirement to provide details of the proposed affordable housing mix could also be addressed by appropriate planning obligations.
HBC Landscape Team	14/02/2022	Provided the following landscape comments: - Recommend that proposed tree planting to the north east corner of the site would be improved by concentrating on less larger trees to retain the open vistas and views to Saint Mary's Church from the public footpaths. - A Landscape scheme that incorporates the retention of existing ditches is recommended. - Encourage proposals to improve the existing public footpaths to make them more accessible to the wider public. - No more than two storey housing would be advised to attempt to mitigate the loss of the wide vistas. - Would be favoured that the introduction of mixed native hedgerow as boundary screening, adjacent to the proposed built form, be implemented. Intermittent native oak tree planting within the hedgerow would retain and enhance the historic landscape character. - Preferred for the site to have cycle and shared footpath access routes to relieve the strain of vehicular traffic and promote healthy travel.	Noted. It is considered that these are all matters to be addressed through subsequent reserved matters applications, when further detail on landscaping, dwelling design and site layout will be provided.

Southern Water	14/02/2022	No Objection. Recommend that the following informative is attached to the consent: 'Construction of the development shall not commence until details of the proposed means of foul sewerage and surface water disposal have been submitted to, and approved in writing, by the Local Planning Authority in consultation with Southern Water.'	Noted.
Hampshire Constabulary	15/02/2022	No comments to make at this stage of the development with reference to prevention of crime and disorder. Notes that the crime prevention strategies outlined in the DAS, which if incorporated into the layout and design of the development, will reduce the opportunities for crime and disorder.	Noted. Measures to reduce opportunities for crime and disorder can be explored in more detail at the reserved matters application stage.
Environment Agency	16/02/2022	No Objection.	Noted.
EHDC Arboricultural Officer	17/02/2022	No Objection. Recommends that a further detailed Arboricultural Method Statement and Tree Protection Plan be conditioned and be submitted as part of a Reserved Matters application.	Noted. GDL are agreeable to an appropriate/suitably worded condition being attached to the planning permission to deal with these matters.
HBC Leisure Manager	10/03/2022 30/03/2022	No Objection. Contribution request towards a community officer to help new residents in the development integrate into existing communities (£265 per dwelling)	Noted. GDL would be agreeable to entering into a Section 106 Legal Agreement to secure planning obligations that are necessary to make the development acceptable in planning terms, subject to such obligations meeting the tests of Regulation 122 of the CIL Regulations.

HBC Environmental Health	17/03/2022	No Objection. Recommends that submission of a CEMP and noise mitigation measures at the Reserved Matters stage are secured through condition.	Noted. GDL are agreeable to appropriate/suitably worded conditions being attached to the planning permission to deal with the submission of a CEMP and noise matters.
Rook Farm Management Company	17/05/2023	Objection. Disputes applicant's rights to utilise Rook Farm Way as an emergency access.	GDL has sought advice that has confirmed a right to utilise Rook Farm Way as an emergency access. The advice received will be provided to HBC separately.
Rook Farm Residents	18/06/2023	Submission of data on sightings of Brent Geese on the site.	The submitted data is noted and has been passed to GDL's ecologists.
HCC Countryside Planning and Development Control	19/09/2023	No Objection subject to conditions and entering into a legal agreement to secure contributions to improve footpaths Havant 93 and 94, and the Hayling Billy Trail.	Noted. GDL would be agreeable to entering into a Section 106 Legal Agreement to secure planning obligations that are necessary to make the development acceptable in planning terms, subject to such obligations meeting the tests of Regulation 122 of the CIL Regs. It is noted that suggested PRoW contributions and costings have now been provided by HCC. These are currently being reviewed by GDL. GDL are also agreeable to appropriate/suitably worded planning condition/s being attached to the planning permission to deal with PROW matters. As footpaths Havant 93 and 94, and the Hayling Billy Trail lie outside of the applicant's ownership, any improvements to these PRoWs should be achieved via way of developer contributions, with

			implementation of the works being carried out by Hampshire County Council.
Natural England	07/02/2022	Holding Objection. Further information required to determine impacts on designated sites. The following information is required: HRA, and further detail on the Nitrogen and Wintering Bird Mitigation site.	GDL has submitted a Brent Goose Mitigation Strategy (November 2022, and it is in process of being updated following further dialogue with Natural England), which sets out a strategy to address impacts on dark-bellied brent geese. The Brent Goose Mitigation Strategy has been prepared having regard to the objectives of the SWBGS, with a proposed refuge site to be secured in perpetuity by legal agreement and its management passed to a suitable management/conservation organisation.
HCC Ecology	09/02/2022	Request for further information regarding proposed offsite winter bird refuge. Recommendation for a more detailed outline of the range of ecological mitigation, compensation and enhancement measures be provided at the outline stage. Welcome submission of BNG metric calculations in spreadsheet form.	The location of the mitigation/refuge site is identified at Appendix A of the Brent Goose Mitigation Strategy. An indicative Refuge Site Strategy Plan is also in the process of being prepared.
Hampshire & Isle of Wight Wildlife Trust	28/0/2022	Objection. Objects to the proposals due to uncertainty regarding impacts on the functionally linked land to SPAs.	Implementation of the Strategy will ensure that the proposed development has no adverse effect on the integrity of the European Sites associated with the Solent complex in respect of the impact pathway of loss of functionally linked land. An outline nutrient mitigation strategy and updated supporting calculations (with supporting evidence) will be submitted in support of the application. This will demonstrate that the operation of the proposed development will achieve nutrient neutrality.
RSPB	28/02/2022	Objection. Objects to the proposals due to uncertainty regarding impacts towards functionally linked land to the Solent SPAs and Brent Goose Strategy.	
HBC Planning Policy (Nutrient Team)	14/02/2022	Applicant should complete and submit the most up to date version of the European Site avoidance and mitigation checklist.	

		Applicant has not provided the location of the offsite nutrient mitigation site.	Implementation of the nutrient mitigation strategy will ensure that the proposed development has no adverse effect on the integrity of the European Sites associated with the Solent complex in respect of nutrient impacts. The BNG metric calculations for the proposed development are available at Appendix 7.3 of the submitted ES.
National Highways	15/02/2022, etc., 12/09/2022	Holding Objection. Applicant to undertake modelling to understand the impact of the development on the SRN (particularly A27/Langstone Road/Park Road South junction).	GDL and its appointed transport consultant (Prime Transport Planning) are continuing to engage with the LPA, HCC and National Highways in respect of highway and transport matters.
HCC Highways	27/04/2022, 06/09/2022, 08/08/2023	Holding Response. Additional information required on following matters: - Additional review of walking and cycling infrastructure pertinent to the development; - Clarification on applicant's rights to utilise Rook Farm Way as an emergency access; - Additional tracking for the site access and St Mary's Road, and suggested amendment to the northern proposed crossing point on Church Road; - Further junction modelling and seasonable traffic assessment; and - Amendments to the Travel Plan.	GDL are in the process of responding to these outstanding highway matters. Further work in relation to the additional design and accessibility points highlighted in HCC's most recent August 2023 comments is currently being undertaken by our highway consultants. This is in addition to the Technical Note (TN1), which was prepared to address comments raised by HCC on the proposed access arrangement and offsite pedestrian improvements offered as part of the application, and a WCHAR that were submitted by GDL in April 2023.
Langstone Residents Association	04/03/2022	Objection. Objects principally on grounds of traffic generation adversely affecting the A3023 through Langstone.	GDL are also reviewing HCC's Travel Plan comments and will respond to these as necessary. As above, further clarification has been sought on GDL's rights to use Rook Farm Way as an emergency access, and this will be submitted to HBC.

			Additional highway modelling work is currently ongoing, including traffic modelling using the Hayling Island microsimulation model that will consider the impact of the proposed development on junctions identified in HCC's and National Highways' consultee comments (including the A27/Langstone Road/Park Road South (Langstone Roundabout) junction). This modelling work is due to be completed in the coming weeks and will be submitted to the Council, HCC and National Highways for consideration in due course.
HBC Planning Policy	22/02/2022, 17/03/2022 (updated 10/05/2022)	Identify that the Council cannot demonstrate a five-year housing land supply and the principle of development of the site is supported by Decision Making Principle 2 of the HDPS. Highlight how the requirement for further clarity on the proposed brent goose mitigation strategy relates to the application of the Presumption in Favour of Sustainable Development in accordance with paragraph 182 of the NPPF and Decision Making Principle 1 of the HDPS Concern that the proposals would result in a reduced quantum of development when compared to Table 1 of the HDPS, particularly given that the development would be expected to achieve 40 dph. Unclear how the site opportunities and constraints have informed the extent of the built development shown. Open space provision significantly exceeds that expected from the development and such, there is concern that the applicant has sought to artificially lower the density of the site. Applicant has submitted a Seasonal Traffic Addendum. Recommended that further engagement takes place with	GDL welcome the acknowledgement that the principle of development of the site is supported by the Council. An updated SHRA will be submitted to inform the Council's AA of the proposed development. It is expected that the Council's AA will conclude that, with the implementation of the proposed mitigation for nutrients and brent geese, the proposed development will not have an adverse effect on the integrity of designated European site (either alone or in combination with other plans or projects). As such, the provisions of paragraph 182 of the NPPF will be satisfied and the presumption in favour of sustainable development will apply to the determination of the application. In respect of the quantum and density of development, the extent of the built developable area is identified on the submitted Development Framework Plan as 7.53 ha and is capable of

		the LPA and HCC with regard to the methodology of this assessment and any mitigation measures that may be required as a result.	accommodating up to 300 dwellings at a density of 40 dph. As explained in the Planning and Affordable Housing Statement, and in separate correspondence since, the proposed quantum of development and extent of built developable land has been determined with regard to the opportunities and constraints (including development requirements) of the site. A key consideration was the retention of view corridors to the Grade II* Listed Church of St Mary, which involves the provision of a view corridor through the site and delivery of an area of open space in the north west corner of the application site. GDL can clarify that the proposed quantum and density of development has not been artificially lowered, but rather reflects an optimal use of the site having regard to known development constraints and opportunities. The Council's open space requirements have been/are being exceeded, but this is in tandem with areas of open space and green infrastructure that are being delivered in response to other site constraints. GDL is continuing to engage with the LPA and HCC in respect of highway and transport matters.
--	--	--	---