



Joseph Toole
Planning Department
Havant Borough Council
Public Service Plaza
Civic Centre Road
Havant
PO9 2AX

Date: 26 October 2023

LPA ref: APP/23/00686

Dear Joseph

Site Address: 174 Southwood Road, Hayling Island

I am instructed by the applicants (Mr and Mrs Snell) in order to provide a response to the current consultee comments in respect of the above planning application. By way of background/introduction I am the author of the Planning, Design and Access Statement submitted in support of the above application and have also been involved in all prior householder and pre-application discussions.

We note the comments received from the Landscape Officer in respect of the above points and wish to highlight the above matter for your consideration:

- The application site does not fall within any specific designation (i.e. AONB etc) and the area is therefore considered unconstrained in planning terms
- Therefore it is solely the normal design policies contained within the Havant Borough Local Plan and NPPF that are engaged; not any higher test
- The matter considered for assessment is that of design, not of landscape, of which we trust that Officers are able to conclude favourable in respect of
- The Landscape Officer's comments do not acknowledge that there is an established building line which varies in height and is appreciated from oblique views along both the sea front and Southwood Road
- The building would be rarely appreciated from face on value in two dimensional terms which appears to be the basis upon which the Consultee comment is submitted
- There are no designated viewpoints from along the sea front nor Southwood Road that are identified as of importance in neither the Havant Borough Local Plan, any Neighbourhood Plan or any Design Guidance



- The test imposed by the policies contained within the Local Plan is not one of “whether the building is higher than the one next to it” - which appears to be the basis upon which the comments are submitted
- Both Local Plan policy and the contents of the National Planning Policy Framework make clear that design should be assessed having regard to the wider context
- In this case, the wider context is not confined to buildings immediately adjacent to it but in appreciation to the wider locality of Southwood Road, as set out in the supporting Planning, Design and Access Statement

On the basis of the above points, it is considered that when the policies contained within the Havant Borough Local Plan and National Planning Policy Framework are applied correctly, it is clear that the assessment of any development of this nature has to have regard to the wider context; not the building immediately adjacent to it.

We wish to stress that this process is one that is statutory and imposed upon all Local Planning Authorities under S38(6) of the Planning and Compulsory Purchase Act 2006 (as amended). In so far that the starting point is the policies contained within the Local Plan.

Further, I wish to draw to the attention of the Local Planning Authority the recent development, permitted on 6th October 2022, at 2 Bembridge Drive, Hayling Island, PO11 9LU; when considering the weight to be given to the above consultation comments.

The approved development (LPA ref: APP/22/00965) permitted a three storey development, in a similar manner to that proposed under this application, in a location where the building would have greater visual prominence; given its end of plot location.



Existing Exposed View



Proposed 3D View



Officers will see that the proposed approach taken by the applicants as part of application APP/22/00965 is one of an increased building height on a prominent location.

Given the NPPF's position of allowing increased building heights when the development results in the general uplift in the design quality of an area; the above development was deemed acceptable on balance.

Officers will be aware that the Planning Practice Guidance requires Local Planning Authorities to take planning decisions in a manner that is consistent with previous similar decisions; taking any other approach can be considered to be *Wednesbury* unreasonable.

The above application APP/22/00965 makes clear that the proposed increase to 2.5 - 3 storeys is wholly acceptable on a site with greater visibility where the upper storey's massing is reduced through appropriate inseting.

These principles have been mirrored on our proposed application, albeit on a site with lesser visibility within the wider streetscape.

As set out in the accompanying Planning, Design and Access Statement submitted in support of the planning application, the paragraph 134(b) of the National Planning Policy Framework makes clear that:

Significant weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

By way of note, significant weight is only mentioned three times throughout the totality of the NPPF and only once in respect of design.

This requirement to give *significant weight* to development that *helps raise the standard of design more generally in an area* significant outweighs any minimal impacts from the overall increase in height within the proposed development.

We hope the contents of this letter assists Officers in the application of the planning balance under Section 38(6) of the Planning and Compulsory Purchase Act 2006 (as amended).

Should you require any further information please do not hesitate to contact me at your convenience.

Yours sincerely

CROSS TOWN PLANNING
— CHARTERED TOWN PLANNER —



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