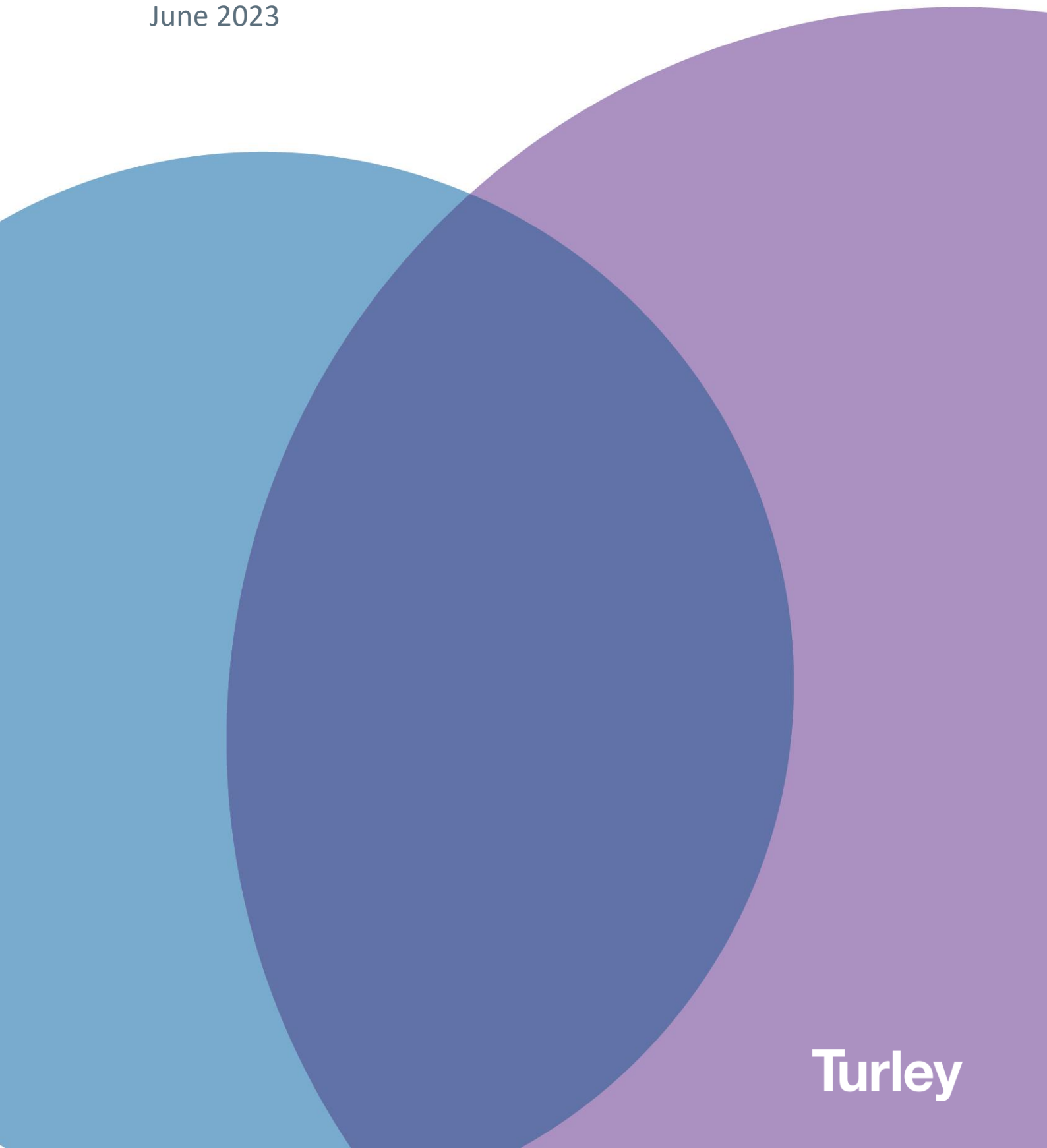


Planning Statement

Land east of College Road, Camp Down, Havant

June 2023



Turley

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Client
Dandara Southern Limited

Our reference
DANS3008

June 2023

1. Introduction

- 1.1 This Planning Statement has been prepared by Turley on behalf of Dandara Southern Limited and submitted to Havant Borough Council ('HBC') in support of a full planning application for the residential development of a site at Land east of College Road, Campdown, Havant (hereafter referred to as 'the site').

Description of Development

- 1.2 The planning application to which this statement relates is submitted on behalf of the applicant and seeks full planning permission for the following:

"Detailed application for mixed use residential development comprising 628 dwellings, community centre, allotments, public open space including play areas, new junction to College Road, related internal access roads, footways and cycleways, pumping station and drainage basins."

- 1.3 A location plan is provided at **Appendix 1**.

Accompanying Documentation

- 1.4 This statement should be read together with the other documents which accompany this application comprising:
- Application Forms and Certificates, CIL Form
 - Covering Letter (prepared by Turley)
 - Application Drawings (prepared by Cooper Baillie)
 - Design & Access Statement (prepared by Cooper Baillie)
 - Planning Statement inc. planning obligations and affordable housing statement (prepared by Turley)
 - Heritage Statement (prepared by MOLA)
 - Archaeology Assessment (prepared by MOLA)
 - Environmental Statement (prepared by Tetra Tech)
 - Flood Risk Assessment and Drainage Strategy (prepared by RCP)
 - Hazel Dormouse Survey (prepared by Tetra Tech)
 - Reptile Survey (prepared by Tetra Tech)
 - Bat Survey (prepared by Tetra Tech)
 - Biodiversity Net Gain Report and Calculations (prepared by Tetra Tech)

- Wintering Bird Survey (prepared by Wild New Forest)
- Nutrient Neutrality and Recreational Disturbance Mitigation (prepared by Tetra Tech)
- Transport Assessment and Travel Plan (prepared by Paul Basham Associates)
- WCHAR Assessment (prepared by Paul Basham Associates)
- Minerals Safeguarding Assessment (prepared by Tetra Tech)
- Arboricultural Report and Tree Survey (prepared by Barrell Tree Care)
- Landscape and Visual Impact Assessment (prepared by GL Studio, included within the Environmental Statement)
- Lighting Assessment (prepared by MMA Consultancy)
- Noise Impact Assessment (prepared by 24 Acoustics)
- Air Quality Assessment (prepared by Omnia Consulting)
- Contaminated Land Investigation Report (prepared by RSK)
- Risk Assessment for unexploded ordnance (prepared by EOD Contracts Ltd)
- Ball Strike Assessment (prepared by Labosport)
- Utilities Assessment (prepared by Connect It)
- Statement of Community Involvement (prepared by Turley)

Structure of the Planning Statement

- 1.5 This Planning Statement sets out a description of the site and the surrounding area, summary of the planning history and provides details of the proposed development.
- 1.6 This Statement also provides a summary of the relevant planning policy at both a national and local level alongside an assessment of how the proposals comply with the planning policy framework with reference to a suite of technical planning documentation and drawings supporting the submission.
- 1.7 A conclusion is then drawn to demonstrate the planning justification as to why planning permission should be granted for the proposed development.
- 1.8 The Planning Statement is structured as follows:
 - **Section 1:** Introduction
 - **Section 2:** Site and Surroundings
 - **Section 3:** Planning History

- **Section 4:** Pre-Application Engagement
- **Section 5:** The Proposed Development
- **Section 6:** Planning Policy Context
- **Section 7:** Planning Considerations
- **Section 8:** Affordable Housing Statement
- **Section 9:** Draft Heads of Terms and
- **Section 10:** Summary and Conclusions

Preliminary Matters - Planning History

- 1.9 A hybrid application was submitted by Persimmon Homes (ref. APP/19/01101), which sought permission for the following:

“Hybrid planning application comprising; full planning application for the erection of 130 dwellings with the creation of new access onto College Road, landscape, drainage, car parking and associated works; and outline planning application for up to 650 dwellings, community and nursery facility (use class D1 and D2), retail unit (use class A1), public open space, landscaping, diversion of public right of way and associated works and infrastructure.”

- 1.10 To date, the application is still yet to be determined. More detail on the planning history can be found in **Section 3** below.

Preliminary Matters - Public Consultation

- 1.11 The project team delivered a pre-application engagement programme which is summarised in the Statement of Community Engagement submitted as part of this application. The engagement undertaken has enabled the project team to build a good understanding of the local context, raise awareness of the proposals, and respond to comments raised with amendments to the layout.
- 1.12 In summary, the Applicant considers that the pre-application engagement undertaken with the local community and stakeholder has been timely, meaningful, and effective. More information can be found in Section 4 below.

Environmental Assessment (EA)

- 1.13 A separate Environmental Assessment (EA) is submitted alongside this application.
- 1.14 An EA is necessary as it has been previously concluded that as a large housing scheme it would fall within Schedule 2 to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the ‘2017 Regulations’). These regulations apply to development which is given planning permission under Part III of the Town and Country Planning Act 1990.
- 1.15 In this instance, the project linked to the proposals are considered to have likely significant environmental consequences due to the scale of the development and the

location adjacent to sensitive receptors relating to protected ecological habitats, heritage assets and the A3(M).

2. Site and Surroundings

The Site

- 2.1 The site comprises former grazing land and is located to the east of Purbrook, east of College Road and extends to approximately 26.6 hectares. The site is located approximately 3.5km south of Waterlooville town centre and 4km west of Havant town centre.
- 2.2 The site is bound to the west by College Road, to the north by HSDC South Downs College, to the east by the A3(M) and existing agricultural land and Portsmouth golf course to the south. The Site is located to the north of Portsdown Hill, decreasing in elevation to the south towards Purbook.
- 2.3 The site is located wholly within Flood Zone 1, representing an extremely low probability of flooding. It has a varied topography, with higher parts located to the south-west and north, and a central lower-lying valley extending south toward the golf course and A3(M).
- 2.4 A Public Right of Way ('PRoW') (route 28) lines the north of the site connecting the pedestrian bridge over the A3(M) along Scratchface Lane to the South Downs College and Purbrook Way.
- 2.5 The site is not located within a Conservation Area or within an AONB, however there is a Scheduled Ancient Monument (SAM) comprising Littlepark Roman Villa which is located on the north eastern section of the site. The path of a Roman road has also been identified within the site. Beyond this is the settlement of Bedhampton which is located approximately 1km north-west of Havant.

Surrounding Area

- 2.6 The site is located close to local amenities, with a post office, convenience store, public house, pharmacy and doctor's surgery all within approximately 15 minutes' walk from the site.
- 2.7 Moreland's Primary school is situated approximately 950m west of the site access from College Road and Crookhorn Lane. Crookhorn College is situated approximately 1.1km north of the site (15-minute walk) and is the nearest secondary school to the site. The site is also located immediately adjacent to South Downs College.
- 2.8 The nearest (northbound and southbound) bus stops to the site are located on College Road circa 150m north of the site. The services from each of these stops include buses to Portsmouth City Centre, Southsea, Gosport, Havant, Petersfield and Hambledon. Additional bus stops are located along Purbrook Way to the north of the site.

- 2.9 The nearest railway station is Bedhampton which is located approximately 3.1km east of the site. The station is within cycling distance of the site (10 ½ minutes). The station provides regular services towards Portsmouth, Southsea, Littlehampton and London Waterloo. The services also provide connections to local stations including Hilsea, Fratton, Havant, Rowlands Castle, Petersfield, Warblington and Emsworth.

3. Planning History

- 3.1 The site has been both the subject of a previous planning application for residential development, as well as a proposed housing allocation in Havant Borough Local Plan.
- 3.2 The Council submitted their new Local Plan for Examination in February 2021, however at a Full Council meeting on the 22nd March 2022, the Local Plan was formally withdrawn under Section 22 of the Planning and Compulsory Purchase Act 2004.
- 3.3 The withdrawn Local Plan allocated the application site (Policy H40) for “*mixed-use development of about 650 dwellings, open space and community centre with sporting facilities*”. The policy allocation included a number of criteria that any subsequent application had to take into account.
- 3.4 The most significant of these criteria include respecting the existing heritage assets and their setting; safeguarding landscape sensitivities; incorporating the existing trees and hedgerows on the site; creating a network of semi-natural habitats linking to the surrounding natural environment; and safeguarding against noise impact of the A3(M).
- 3.5 In considering the soundness of the Havant Borough Local Plan following the completion of the Stage 1 of the Local Plan Examination, in their preliminary findings letter dated November 2021, amongst other matters, the Inspector assessed the deliverability of the proposed allocation at Campdown
- 3.6 Based on the evidence presented, the Inspector was not convinced that constraints relating to ecology (wintering bird mitigation) and heritage had been satisfactorily addressed to the extent that the allocation could be considered deliverable. The evidence provided reflected that submitted in support of a hybrid application on the site made by Persimmon Homes (Council reference APP/19/01101) for a total of 780 dwellings.
- 3.7 As outlined above, a hybrid application was submitted by Persimmon Homes (Council reference APP/19/01101), seeking full planning for the erection of 130 dwellings with the creation of new access onto College Road: and outline planning application for up to 650 dwellings. This application has been subject to detailed consultation responses from key statutory and non-statutory consultees. To date the application remains undetermined.
- 3.8 These formal consultation responses have raised several detailed issues and matters to address with the submitted scheme that have enabled a deeper understanding of the constraints and opportunities set out within the former policy allocation criteria, and particularly in relation to wintering bird mitigation and heritage. This also enables a clearer understanding of the extent of the site that should be safeguarded to address these issues. This is considered in more detail in Section 7 below.

4. Pre-application Engagement

- 4.1 In addition to a formal pre-application submission was made to HBC, in the light of the planning history above and previous comments raised in consultation responses to the previous application, and by the Local Plan Inspector in considering the Local Plan review, separate pre-application submissions were made to Heritage England, Natural England and Hampshire County Council as highway authority.
- 4.2 A separate community engagement strategy was developed with consideration of the Government's policy on community involvement and HBC's Statement of Community Engagement (2022), as detailed in **Section 2**.
- 4.3 Details of the pre-application consultation and engagement activities are summarised under the sub-headings below and covered in more detail within the Statement of Community Engagement submitted separately.

Pre-application discussions with Havant Borough Council Officers

- 4.4 A formal pre-application submission was made registered with HBC on 17th June 2022 (Council reference: GEN/22/00557). The application was supported by a number of plans and reports, including a covering letter detailing the background and planning policy context, a Design & Access Statement and Sketch Layout Plan, as well as specialist consultant input in the form of an Ecology Summary, a Highways Position Statement and a letter in respect of Archaeology and Heritage matters.
- 4.5 HBC undertook consultation with key internal and external stakeholders such as Hampshire County Ecologist, Local Lead Flood Authority, Portsmouth Water, Hampshire County Highways, Hampshire County Minerals, HBC Landscape, and HBC Economy.
- 4.6 A formal response was received from HBC on 23rd September 2022 (**Appendix 2**). The response provided some helpful high-level feedback on the approach to the layout and design, as well as summarising responses from the key consultation above. It also highlighted the significance of addressing heritage and ecological matters raised by the previous Local Plan Inspector in assessing the deliverability of the site as an allocation in the now withdrawn emerging Local Plan.

Pre-application with Historic England

- 4.7 In recognition of the importance of addressing heritage matters raised previously, a separate pre-application submission was made direct to Historic England (HE). A formal response was received on 26th October 2022.
- 4.8 HE welcomed that no development was proposed within or immediately east or west of the Scheduled Roman Villa site, and that the intention was to create some viewing corridors from the Scheduled Roman Villa site and the Scheduled Long Barrow to the south to be maintained. Further information was required on how this will be achieved.

- 4.9 A more informal approach to the layout was recommended adjacent to the Roman Road, though the approach to materials and design for this character area was welcomed. Care was needed to be taken with landscaping and play provision north of the Roman Road given the setting of the Scheduled Roman Villa, but equally it was recognised that sensitive design and landscaping could help enhance these features, e.g., through provision of avenue planting and interpretive boards.

Pre-application with Natural England

- 4.10 In recognition of the importance of addressing ecological (wintering bird mitigation) matters raised previously, a separate Discretionary Advice Service 'DAS' submission was made direct to Natural England (HE). This detailed proposed mitigation in the form of a series of bunds within Northney Farm, on Hayling Island. A formal response was received on 26th October 2022.
- 4.11 The NE response encouraged exploring potential for a permanent bird refuge on the southern part of Northney Farm which is outside of the Special Protection Area (SPA) ecological designation, rather than within the SPA.
- 4.12 Reference was made to specific mitigation guidance within areas identified as Primary Support Areas for wintering birds, where there will be a requirement for the offsetting area to fulfil the same special contribution and particular function of the areas lost or damaged for the same species of birds.

Pre-application with HCC Highways

- 4.13 Although not specifically referenced by the Local Plan Inspector, there were a number of outstanding matters in relation to the site which needed to be addressed prior to the Highway Authority being able to recommend positively on the previous application submission by Persimmon for the development of the site (HBC reference: APP/19/01101). A formal response was received on 31st October 2022.
- 4.14 The response provided some more detailed feedback on proposed access junction, modelling detail, and sustainable travel opportunities, but did not raise any objection to the development of the site.

5. The Proposed Development

The Proposed Development

5.1 The description of development is as follows:

“Detailed application for mixed use residential development comprising 628 dwellings, community centre, allotments, public open space including play areas, new junction to College Road, related internal access roads, footways and cycleways, pumping station and drainage basins.”

5.2 To summarise, the proposed development seeks full planning to deliver:

- 628 new residential dwellings;
- A mix of market and affordable homes, including provision of 30% affordable housing;
- New vehicular access into the site and junction from College Road;
- The provision of new open public green spaces, including play equipment, which will provide amenity space for both new and existing residents;
- New interconnected shared cycleways/footways and formal and informal pedestrian routes providing good quality links within and out-with the development;
- A new community centre;
- Allotments and a community orchard;
- A sustainable drainage system; and
- Associated infrastructure and earthworks.

5.3 Additional details in relation to, and in support of, the proposed development can be found within the Design and Access Statement (prepared by Cooper Baillie), which also accompanies the application submission. More detailed technical inputs are included within separate reports prepared by specialist consultants.

Housing Mix

5.4 Consideration has been given to the location of the site and the surrounding context. The housing mix is as follows:

Market Housing Mix

5.5 The proposed market mix for the scheme is set out in detail in Table 1 below. The development will provide a mix of 1, 2, 3, 4, and 5-bedroom properties across the site.

Table 1: Proposed Market Mix

Dwelling size	No. of dwellings
1 Bedroom Flat	11
2 Bedroom Flat	72
2 Bedroom Coach House	13
2 Bedroom Duplex	8
2 Bedroom House	37
3 Bedroom House	220
4 Bedroom House	73
5 Bedroom House	6
TOTAL:	440

Affordable Housing Mix

- 5.6 In line with the Council's affordable housing policy, the development will deliver 30% affordable dwellings, which equates to 188 dwellings across the site. The table below sets out the proposed mix of affordable units:

Table 2: Proposed Affordable Housing Mix

Dwelling size	No. of dwellings
1 Bedroom Flat	39
2 Bedroom Flat	66
2 Bedroom Coach House	13
2 Bedroom House	19
3 Bedroom House	49
4 Bedroom House	2
TOTAL:	188

Scale and Density

- 5.7 The proposed development will include 2 and 3 storey dwellings across the site with garages at single storey.

- 5.8 The density figure for the site is 40.89 dwellings per hectare.

Layout

- 5.9 The layout of the proposed development will include the following:

- Provision of residential neighbourhoods located centrally and to the south of the site, with a new access junction with College Road;

- Provision of a large area of informal open space to the north;
- Inclusion of an acoustic fence along the eastern boundary to mitigate noise from the A3(M);
- Provision of a community centre centrally within the site adjacent to open space provision with good pedestrian access to the wider development;
- Provision of allotments to the east of the site;
- Creation of a series of public open spaces and play spaces throughout the development connected by attractive formal and informal pedestrian links;
- A hierarchical network of internal streets extending from the main access from College Road to the west
- Retention of boundary vegetation and trees; and
- Proposed significant additional tree, hedge and vegetation planting.

Character Areas

5.10 The proposed development has been set out into 4 overarching character areas that can be refined through the course of the application process that responds to the wider vernacular, whilst providing a distinct character area for the development and provides both a range of character that responds and reinforces the landscape and heritage assets on and off the site.

5.11 The 4-character areas are as follows:

- **CA01 Spine Road:** The Spine Road is the main entrance into the site and sets the tone for the development with a mix of 2, 2.5 and 3 storey development to reinforce the hierarchy of movement.
- **CA02 Core:** This is a significant character area that is located off the spine road and landscape corridors running through the site. T
- **CA03 Campdown Hills:** The Campdown Hills area is located within the more intense area of level change.
- **CA04 The South Western Quarter:** The South-Western Quarter is located within a confined pocket overlooking the golf course.

5.12 Details regarding each character area is provided within the supporting Design and Access Statement (prepared by Cooper Bailie)

Appearance

5.13 The materials palette for the residential element of the scheme proposes the following:

- Red Multi Brick

- Grey Eternit Cladding
- Wood Effect Cladding
- Blue/Grey Eternit Cladding
- Tile Hanging
- Contemporary External Light & Door Numbering
- 25mm Projecting Window Surround
- Contemporary Grey Dormer Windows
- Contemporary Glass Juliet Balconies
- Stretcher Bond Projecting Brick
- Flemish Bone Projecting Brick
- Contemporary Flat Porches
- White Casement Windows
- Mono-Pitched Porches
- Traditional Exterior Lighting

Access

- 5.14 The vehicular site access into the development will be taken from College Road, allowing the principal route to meander through the centre of the site, with lower order roads connecting from it. An emergency access is also provided to the south the main access.
- 5.15 Pedestrian access points are proposed around the site to maximise sustainable connections and permeability, connecting to the existing Public Right of Way.

Emergency Access

- 5.16 The proposed development has been designed to enable fire vehicles to get within 45m of all points of each building. Fire vehicles will enter the site via the main signalised access and either continue along the main spine road or utilise an emergency access near the site access to allow secondary access.
- 5.17 This route would be restricted for all vehicles except fire tenders, forming an additional cycle / pedestrian access into the site. RGP have prepared internal vehicle tracking drawings which have been submitted as part of this application.

Parking and Cycle Parking

- 5.18 The proposed parking strategy for the site uses a combination of garages, driveways, and laybys. The proposed parking within the site is set out in **Table 5.1** below.

Table 5.1: Vehicular Parking Spaces

Location	No. of spaces
Allocated Parking Spaces	953
Allocated Car Ports	58
Garages	107
Visitor Spaces	103
Unallocated Spaces	139
Total	1,360

- 5.19 In addition, a further 5 spaces are proposed for the community centre and 2 for the substation. All parking spaces adhere to HBC geometric requirements.
- 5.20 The development will provide a total of 1,206 long stay cycle storage spaces and 242 short stay spaces. Cycle parking will be provided in garages (where provided) or sheds in rear gardens for the houses and cycle stores for the flats, whilst short stay parking will be located across the development in the form of Sheffield stands.
- 5.21 There are no parking standards for community centres within the development plan or supplementary guidance, however it is anticipated that visitors could also utilise short stay spaces.

Domestic Waste & Recycling

- 5.22 For the residential dwellings, an area of hard-standing will be provided to ensure refuse and recycling can be stored within the garden with provision of a side gate to access the street.
- 5.23 The development has been designed so that a large refuse vehicle can manoeuvre through the street network. Bins will be allocated within a 25m carry distance of refuse vehicles and within 30m of a resident's boundary.

Landscape

- 5.24 A landscape masterplan has been prepared by GL Studio and submitted as part of this application. The landscape proposals across the site include the following:
- A tree lined avenue into the site;
 - Retention of the existing Northern Open Space due to the location of the Scheduled Ancient Monument;
 - Outside of the SAM area tree planting, footpaths and orchard and a play spaces have been added;
 - A range of play areas have been provided throughout the development;
 - A dedicated space for allotments and a community orchard;

- SuDs basins; and
- New pedestrian links.

Public Open Space

5.25 The proposed development includes a total provision of 9.39 hectares of public open space. The table below sets out details of the typology and size of provision across the site.

Typology	Provision (in hectares)
Amenity Green Space	1.63
Public Park and Gardens	2.16
Natural and semi-natural green space	4.79
Provision for children and young people	0.39
Allotments, community gardens and orchards	0.42

5.26 The following play and open space features will be included:

- Large areas of open space
- Equipped Play spaces
- Informal LAPs
- Proposed Roman Villa inspired play space
- Roman Road inspired play space
- Proposed formal play space
- Boardwalks across the SuDS features providing access to these spaces, with seating areas and viewing platforms
- Community orchard and allotment space
- Mown paths and seating areas within the Scheduled Ancient Monument area using simple materials (non-invasive) such as boulders
- Emphasis of the Roman Road through the use of mown grass areas and tree planting.

Community Centre

5.27 A community centre (approximately 201.1 sq. m) will be provided within the development to offer a community function with opportunity for nursery space.

5.28 The community centre will provide 5 dedicated parking spaces.

6. Planning Policy Context

- 6.1 This section of the Planning Statement outlines the statutory Development Plan and other material considerations relevant to the determination of this planning application. It provides a review of the key planning policies which are the subject of a more detailed assessment.

The Development Plan

- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that:

“Regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

- 6.3 The site is under the jurisdiction of Havant Borough Council and the relevant Development Plan at the time of submission of the planning application in this case consists of the Havant Borough Local Plan (Core Strategy) (2011), the Havant Borough Local Plan (Allocations) (2014) and the Hampshire Minerals and Waste Plan (2013).

- 6.4 Other material considerations include the following:

- National Planning Policy Framework (NPPF);
- National Planning Practice Guidance (PPG); and
- Relevant adopted Supplementary Planning Documents.

The Development Plan

- 6.5 Policies relevant to this proposal as set out in the Havant Borough Council adopted Core Strategy and Allocations document are set out below.

Havant Borough Council Core Strategy (2011)

- 6.6 The Core Strategy was adopted in March 2011. Those policies of relevance to the proposals are set out below:
- Policy CS1 – Health and Wellbeing
 - Policy CS7 – Community Support and Inclusion
 - Policy CS8 – Community Safety
 - Policy CS9 – Housing
 - Policy CS11 – Protecting and Enhancing the Special Environment and Heritage of Havant Borough
 - Policy CS13 – Green Infrastructure
 - Policy CS15 – Flood and Coastal Erosion Risk

- Policy CS16 – High Quality Design
- Policy CS17 – Concentration and Distribution of Development within Urban Areas
- Policy CS19 - Effective Provision of Infrastructure
- Policy CS20 – Transport and Access Strategy
- Policy CS21 Developer Requirements
- Policy DM8 - Conservation, Protection and Enhancement of Existing Natural Features
- Policy DM10 - Pollution
- Policy DM11 – Planning for More Sustainable Travel
- Policy DM12 – Mitigating the Impacts of Travel
- Policy DM13 – Car and Cycle Parking on Residential Development

Havant Borough Council Local Plan (Allocations) (2014)

- Policy AL1 – Presumption in Favour of Sustainable Development
- Policy AL2 – Urban Area Boundaries and Undeveloped Gaps between Settlements
- Policy DM18 – Protecting New Development from Pollution
- Policy DM20 – Historic Assets
- Policy DM23 – Sites for Brent Geese and Waders
- Policy DM24 – Recreation Disturbance to Special Protected Area (SPAs) from Residential Development

Community Infrastructure Levy

- 6.7 Havant Borough Council adopted their Community Infrastructure Levy Charging Schedule in August 2013.
- 6.8 The site falls within the category identified as the ‘rest of the Borough’ which triggers a CIL charge of £126.78 per square metre for residential developments of 1 dwelling or more.

Material Considerations

National Planning Policy Framework ('NPPF')

- 6.9 The revised National Planning Policy Framework (the 'NPPF') was published in July 2021. The Framework covers a range of issues to promote sustainable growth and protect the environment. The following paragraphs of the NPPF are considered of particular relevance to the determination of this application.
- 6.10 Paragraph 7 of the Framework sets out that the purpose of the planning system is to contribute to the achievement of sustainable development.
- 6.11 At paragraph 8, the Framework sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 indicates that achieving sustainable development concerns three overarching objectives, which are interdependent and mutually supporting. These objectives are:
- (a) *“an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - (b) *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
 - (c) *an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*
- 6.12 Paragraph 10 states that at the heart of the framework is a presumption in favour of sustainable development.
- 6.13 Paragraph 11 sets out that, for decision taking, this means:
- “approving development proposals that accord with an up-to-date development plan without delay; or
 - where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:

- (i) *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- (ii) *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.*

6.14 Paragraph 14 advises:

“In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:

- (a) *the neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;*
- (b) *the neighbourhood plan contains policies and allocations to meet its identified housing requirement;*
- (c) *the local planning authority has at least a three year supply of deliverable housing sites (against its five year housing supply requirement, including the appropriate buffer as set out in paragraph 74); and*
- (d) *the local planning authority’s housing delivery was at least 45% of that required over the previous three years.”*

6.15 Footnote 7 of the NPPF confirms that the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

National Planning Practice Guidance (‘PPG’)

6.16 The National Planning Practice Guidance (NPPG) was launched by DCLG on 6th March 2014 as a web-based resource to bring together planning practice guidance for England in an accessible and usable way.

6.17 The NPPG sets out guidance on a wide range of topics and due regard has been paid to these as appropriate in the development of the proposals.

Supplementary Planning Documents

6.18 The following supplementary planning documents are considered of relevance in the determination of this planning application:

- Borough Design Guide (December 2011);
- Housing SPD (July 2011, partially updated September 2019); and
- Parking SPD (July 2016)

Five Year Housing Land Supply Update (March 2023)

- 6.19 In accordance with national policy, the Council are required to provide a five-year supply of housing. The Council's latest position statement concludes that the Council is only able to demonstrate 1.81 years supply of housing.

Emerging Havant Borough Council Local Plan

- 6.20 The Council are now preparing their new 'Building a Better Future' Local Plan and have recently undergone a Regulation 18 consultation. The Local Development Scheme (published September 2022), anticipating the following dates for preparation of the new plan:

- Regulation 19 Consultation – Q1 2024
- Submission - Q2 2024
- Examination – Q2 2024 – Q1 2025.

- 6.21 Given the current status of the emerging Local Plan it is not considered that it should be afforded no weight in the determination of this planning application.

Housing Delivery Position Statement (March 2022)

- 6.22 Following withdrawal of the Council's Local Plan on the 16th March 2022, the Council adopted a housing delivery position statement which sets out how planning applications for housing not in accordance with the Development Plan will be considered in the context of the Council's 5-year housing land supply which is currently 1.81 years as of March 2023.
- 6.23 The Statement has been prepared to respond to lack of five-year supply and consequent presumption in favour of sustainable development in Havant Borough, and provides a material consideration in the determination of planning applications.
- 6.24 In particular, it sets out how the Council will apply the 'tilted balance' in accordance with national policy, particularly paragraph 14 of the National Planning Policy Framework.
- 6.25 Whilst there is a need to significantly boost housing supply in Havant Borough, this must be done in a responsible way. The Position Statement details how development proposals on sites not in the Adopted Local Plan can achieve sustainable development.
- 6.26 The application site is listed within the position statement, under Decision Making Principle 2 as '*sites not in accordance with the Development Plan where the Council accepts the principle of development*' and more specifically allocation WV6 '*indicatively for 650 units*'.
- 6.27 Decision Making Principle 5 of the Housing Delivery Position Statement seeks to ensure suitable development quality. It sets several criteria that are expected of development, including high standard of design, provision of design codes to inform local character and distinctiveness; provide a minimum of 40 dwellings per hectare based on a net developable area; create new and improved existing pedestrian and cycle route; incorporate a comprehensive ecological strategy, which achieves biodiversity net gain

and creates green links and ecological corridors, and complies with national internal space standards.

- 6.28 There are also specific criteria requirements that will apply depending on the scale of development. In this instance the proposals would be expected to provide 30% affordable housing, and a range of dwelling types and sizes to meet local housing need, including 35% of the overall housing mix as two-bedroom homes unless locally identified need evidence indicates an alternative approach should be taken.
- 6.29 It is also expected that high quality on-site open space will be provided to a standard of 1.5ha per 1,000 population; including an element of play where the open space requirement exceeds 0.5ha. On greenfield sites, part of this requirement will be provided in the form of community food growing space, to a standard of at least 0.2ha per 1,000 population.
- 6.30 There are several other criteria within Decision Making Principle 5 that relate to the internal design of dwellings, delivering sustainability development, and commitments to secure off-site contributions.

7. Planning Considerations

- 7.1 This section of the Planning Statement assesses the proposed development against the adopted Development Plan, read as a whole and therefore in light of the planning balance set out in the NPPF (2021).
- 7.2 This application is put before the Council at a time where there is significant need for the delivery of both market and affordable residential accommodation within the Borough, evidenced by the lack of a five-year housing land supply and significant affordable housing needs.

Principle of Development

- 7.3 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise. Section 70 (2) of the Town and Country Planning Act 1990 provides that the local planning authority shall have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations. In the case of Havant Borough Council, the adopted Development Plan is the Core Strategy, adopted in 2011 and the Allocations Local Plan, adopted in 2014.
- 7.4 The Development Plan should be read as a whole, rather than seeking compliance with every policy. In any event, the assessment undertaken within this Planning Statement demonstrates that the proposals are consistent with the relevant development management related policies contained within the Development Plan when read as a whole.
- 7.5 The site is an undeveloped parcel of land southeast of Purbrook situated between Widley and Bedhampton. The site is bound to the east by College Road, to the north by HSDC South Downs and to the west by the A3(M).
- 7.6 Core Strategy Policy CS17, supported by policy CS20 seeks to concentrate and distribute development within defined urban areas. This approach is built upon by policy AL2 of the Local Plan (Allocations), which also seeks to direct development to urban areas to help define the separate identities of settlements.
- 7.7 The Vision for Havant Borough as set out at paragraph 1.38 of the adopted Core Strategy states that *“At least 2,000 new homes and major new areas of employment will be built on the edge of Waterlooville, which will continue to be attractive to high tech businesses.”* The adopted Local Plan also includes greenfield allocations within Havant
- 7.8 Although the policy approach is to focus development within urban areas, there is equally an acknowledgement through the development plan allocations to meet housing needs, that sustainable locations on the edge of built up areas such as this are appropriate to meet this need in principle.

- 7.9 As outlined above, Policy H40 of the recently withdrawn Havant Borough Local Plan (submission version) allocated the site for ‘*A mixed-use development of about 650 dwellings, open space and community centre with sporting facilities*’.
- 7.10 Following the withdrawal of the Plan, the Council’s Housing Delivery Position Statement identifies the site under “*Decision Making Principle 2 – sites not in accordance with the Development Plan where the Council accepts the principle of development.*” This supports the principle of development at the site as it was an emerging site allocation (WV6 Campdown) in the now withdrawn Havant Borough Council Local Plan. The allocation identified an indicative number of 650 dwellings that could be delivered on the site.
- 7.11 Though it is a non-statutory document, the Position Statement forms a material consideration in the determination of planning applications in Havant Borough. On the basis of the above, it is considered that the principle of development of the site has been established.

Presumption in Favour of Sustainable Development

- 7.12 The NPPF (2021) is a material consideration and at paragraph 10 it confirms that, at the heart of the NPPF is a presumption in favour of sustainable development. In relation to decision-taking, paragraph 11 explains that sustainable development means:

“c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

- 7.13 This position is echoed by the adopted Core Strategy which states under policy AL1 (Presumption in Favour of Sustainable Development) that the Council will take a positive approach that reflects the presumption in favour of sustainable development and planning applications that accord with the policies in the Local Plan will be approved without delay, unless material considerations indicate otherwise.
- 7.14 It is acknowledged that in accordance with the NPPF the presumption does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

- 7.15 In this instance, the site includes land that is identified as suitable habitat for wading birds and Brent Geese. As set out within the wintering bird mitigation report accompanying this application, impacts can be off-set through an alternative site at Northney Island, through enhancement of existing habitat. As such, it is considered that an Appropriate Assessment should conclude no adverse effect on the integrity of the habitat site, and therefore the presumption will remain.
- 7.16 As was explained in the earlier section of this Statement, the Council are currently unable to demonstrate a five-year housing land supply as has been tested through a recent appeal decision dated 16th May 2023 (APP/X1735/W/22/3305704) which re-confirms (paragraph 61) that the Council can currently only demonstrate a supply of 1.8 years.
- 7.17 Therefore, whilst it is considered that the principle of development of the site is consistent with the development plan, as well as broad development management policies, it should be acknowledged that the presumption in favour of sustainable development applies in accordance with paragraph 11d of the NPPF.
- 7.18 Overall, the Applicant's position is that there are material and demonstrable benefits arising from the development compared to the limited conflict with the Development Plan. In those circumstances, the Application considers that permission should be granted.
- 7.19 With the application of the presumption in favour of sustainable development (as we consider should still be the case at the time of determination), the adverse impacts of granting permission would need to significantly and demonstrably outweigh the benefits when assessed against the NPPF taken as a whole. The Applicant considers that in this case it is the benefits which outweigh any harm, which can be suitably mitigated. In those circumstances, permission should be granted.

Site Suitability

- 7.20 Policy CS17 of the adopted Core Strategy establishes the principle of concentrating development within the five urban areas of the Borough, including Waterlooville and Havant, to which the site closely relates. Notwithstanding this, the adopted Local Plan (Allocations) allocates a number of sites within Waterlooville and Havant for residential development suggesting the Council acknowledge that this is a suitable location for new residential development.
- 7.21 The application site is well located in relation to sustainable transport options, with the nearest bus stops to the site are located on College Road circa 450m north of the site or 500m to the north. The services from each of these stops include buses to Southsea, Gosport, Havant, Petersfield and Hambledon.
- 7.22 The nearest railway station is Bedhampton which is located approximately 3.1km east of the site. The station is within cycling distance of the site (10 ½ minutes). The station provides regular services towards Portsmouth, Southsea, Littlehampton and London Waterloo.
- 7.23 The application site is well-situated to link into existing pedestrian and cycling infrastructure and within walking and cycling distance to a number of local facilities.

Further details of this are set out in the supporting Transport Statement (prepared by Paul Basham Associates) and Design and Access Statement (Cooper Baillie) submitted in support of this application. The site represents a sustainable location for the provision of housing, enhanced by the provision of several on site facilities.

The Delivery of Homes to Meet Local Needs

- 7.24 The development of this site will promote a strong, vibrant and healthy community in Havant Borough by providing a supply of homes to meet the needs of present and future generations.
- 7.25 The development of the site will also be in-line with the Council's ambitions to develop the site as it was previously earmarked for development in the submitted Local Plan (now withdrawn). Notwithstanding this, the Council have clearly stated in the Housing Delivery Position Statement that they support the principle of development on the site.

Affordable Housing Provision

- 7.26 Policy CS9 of the Core Strategy requires sites of 15 dwellings or more to deliver 30-40% affordable housing. In addition, the Housing Delivery Position Statement identifies the proposals would be expected to provide 30% affordable housing. The proposals will deliver 30% affordable housing across the site which equates to 188 residential units.
- 7.27 The proposed affordable housing will be properly integrated into the overall development, and there shall be no difference in external appearance when compared to the market housing proposed.
- 7.28 Section 8 below considers the need for Affordable Housing, and the proposed extent, form, tenure and distribution in more detail.

Community Inclusion, Safety and Provision

- 7.29 Policy CS7 (Community Support and Inclusion) of the adopted Core Strategy requires planning applications to be informed and shaped by community and local stakeholder involvement. Section 4 of this planning statement and the supporting Statement of Community Involvement (prepared by Turley) provide details of the engagement undertaken during preparation of the application.
- 7.30 Policy CS8 (Community Safety) of the adopted Core Strategy states that permission will be granted for development proposals that engrain community safety into the development process from the beginning and maximise opportunities for natural surveillance and 'defensible space'.
- 7.31 In response to this, the DAS submitted as part of this application details how the development has created safe and overlooked streets and spaces. The following elements have been included within the design of the scheme:
- Site access points are to be overlooked and fronted by development.
 - Pedestrian and vehicular movement is generally separated across the site to ensure safety.

- The design and layout of development provides permeable and legible forms, in accordance with the principles established within the DAS, offering users multiple ways through the site that are safe and overlooked.
- All open spaces, parking areas and streets are overlooked by development with activity promoted onto the streets and spaces.
- Where there are walls that face onto the street, adjacent development or surrounding development will provide natural surveillance to these areas.
- Clear demarcation of ownership boundaries across the site will be established and will be defined by a combination of built form and landscape treatment.
- Defensible measures to private property derive from the overall proposed block structure and placement of building form. Further protection is to be provided through physical measures that include walls, fenced areas, landscape treatment, gates and doors.
- Activity on the site is to occur within the open space and public areas that are overlooked by surrounding development. All principal access points into housing is from front doors that address the streets and open spaces.

7.32 Policy CS1 (Health and Wellbeing) states that permission will be granted for new development that *“Creates, where necessary, new open spaces that are located within or close to housing developments, that is safe and accessible for children to play and contributes to the borough’s green infrastructure.”*

7.33 In response to this, the proposed development will provide 9.39 hectares of public open space which will include a number of safe, accessible spaces for children to play whilst contributing towards the borough’s green infrastructure.

7.34 Policy CS1 requires developments to contribute towards the doubling of existing allotment spaces within the Borough. The scheme will provide a dedicated space for allotments, community gardens and a community orchard, focussed on food production which will contribute towards encouraging outdoor exercise and healthy food habits.

7.35 Policy CS1 also requires developments to contribute to the availability of community facilities through new provision. The development will provide a new community centre which will benefit future residents of the site and the surrounding area. As supported within the formal pre-application advice (**Appendix 2**), the proposed community centre is located within the centre of the site to be the community heart of the development connected by cycle and footpath links. Its position at the axis of the north-south and east-west movement, as well as addressing the linear park elements provided a rich, usable resource.

7.36 There are 5 parking spaces located directly outside the community centre with a further 14 visitor/unallocated spaces within close proximity to the community centre.

- 7.37 The community centre offers a space that can be utilised by residents with potential use as a children's nursery, subject to further discussion.
- 7.38 On the basis of the above, it is considered that the proposed development accords with the requirements of Policies CS1, CS7 and CS8 of the adopted Core Strategy.

Design

- 7.39 Further details on the design evolution of the proposals are set out in the accompanying Design and Access Statement. In summary the design concept has been determined by the desire to create a high quality, well connected new neighbourhood.
- 7.40 The proposed development will accord with the principles of high-quality design and best practice in accordance with the Borough Design Guide SPD, National Design Guide, and the NPPF to create a townscape that is both varied, and yet sympathetic to its environment. The aim is to achieve a development with a strong identity and distinct sense of place, whilst at the same time integrating with the existing community.
- 7.41 Core Strategy Policy CS16 states that planning permission will be granted for development that is designed to a high standard, which helps to create places where people want to live, work and relax. The policy requires developments to respond and draw inspiration from local context and identifies and responds positively to existing features of natural, historic or local character within or close to the proposed development site.
- 7.42 The DAS demonstrates that this process has been followed and will deliver high quality placemaking.

Layout

- 7.43 The following principles have been adopted in the detailed design of the layout, the landscaping, the houses and community building in order to contribute towards a sustainable form of development:
- Good solar orientation of properties in order to optimise solar gain.
 - Careful site planning to allow topsoil and sub-soil arisings to be retained on site for re-use in the raising of ground levels to accommodate the proposed finished levels and noise acoustic bund.
 - Maximum retention of existing trees and hedgerow, as well as extensive vegetation and planting throughout the site.
 - Multi-purpose open space that incorporates the proposed attenuation to provide a functional role within the drainage strategy, as well as enhancing biodiversity, recreation provision and the visual landscape character of the development.

- Provision of resident cycle storage, an accessible network of pedestrian footpaths and cycleways, together with visitor cycle parking within public open spaces, to encourage the use of alternative modes of transport.
- Provision of electric car charging points to all on-plot residential parking spaces.

Relationship to Portsmouth Golf Course

- 7.44 As the application site is located in close proximity to Portsmouth Golf Course, which is located to the south west of the site, the application is supported by a Ball Strike Assessment prepared by Labosport.
- 7.45 The report has been prepared to assess the potential risk of golf balls surpassing the boundaries of Portsmouth Golf Course and entering the proposed development. The report concludes that the analysis undertaken identifies a need for ball stop fencing or netting to protect the proposed development from ball trajectories of the 6th and 7th hole tee on the course.
- 7.46 The exact extent of the mitigation to be delivered will be confirmed post submission.

Technical Considerations

Landscape

- 7.47 The Framework recognises the intrinsic character and beauty of the countryside, whilst supporting thriving rural communities within it. Paragraph 130 states that planning decisions should ensure developments are sympathetic to the landscape setting, while not preventing or discouraging appropriate innovation or change. Paragraph 174 states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.
- 7.48 Policy CS16 (High Quality Design) states that permission will be granted for development that is designed to a high standard and demonstrates that its design integrates with existing local landscape features, promotes wildlife and biodiversity and/or applies characteristics of the local area into the design where possible to create variety and interest.
- 7.49 Policy CS13 (Green Infrastructure) states that development will be permitted that *"Incorporates, where appropriate, improvements to existing green infrastructure through the restoration, enhancement or creation of additional resources."*
- 7.50 This application is accompanied by an Illustrative Landscape Masterplan (ref. GLS_050_110_1200) which details the proposed landscape treatment for the scheme. The scheme will include the following features:
- Boundary vegetation enhancements and general inclusion of native hedgerow, tree and shrub planting within the open spaces, creating additional habitat for dormice and other wildlife, whilst helping blend the development into the wider landscape.

- Mixture of native and ornamental street trees proposed throughout residential parcels. This will provide a natural vertical element along avenues and help to soften views of the built form.
- Suitable wetland wildflower mix and native wetland shrub planting in or immediately adjacent to SuDS features that will experience periodical flooding improving site biodiversity and provide additional wetland habitat for local wildlife.
- Introduction of permanently wet pond features to create interest and increase habitat diversification. The inclusion of reeds will provide shelter for wildlife and visual interest.
- Proposed ornamental shrub, perennial and ornamental grasses will add colour and seasonal interest and help define the street character.
- Tree and shrub planting on the re-enforced slope will soften the engineering feature introduced to increase the usability of rear gardens where existing topography is steep.

7.51 The application is also supported by a Landscape and Visual Impact Assessment which is included within the supporting Environmental Statement (prepared by Tetra Tech). The assessment provides full details of the landscape context and visual analysis.

Wintering Bird Mitigation

7.52 The proposals involve the development of habitat identified as being important for Brent Geese and wintering birds, including both 'primary support area' and 'secondary support area'. It is therefore important to ensure suitable compensatory habitat is provided to off-set this loss. Land has been identified at Northney Farm, Hayling Island, to provide enhanced habitat for this purpose.

7.53 The application is supported by wintering bird strategy report which provides detailed survey information for both the application site and the site at Northney Farm, to provide a suitable baseline of the significance of each and sets out how the land at Northney Farm will be enhanced to provide for the necessary compensation.

7.54 Campdown has been historically used by Curlew and Brent Geese. However, it has since become unsuitable for either species due to the removal of grazing from the site and is now subject to significant levels of disturbance from dog walkers and other recreation. Upon restoration of the key area, no brent geese were recorded and very low numbers of curlew. As a result of the development, this area would be lost, although in the absence of development it is unlikely that the site would be maintained in suitable condition.

7.55 Northney is used by high numbers of both Curlew and Brent Geese and is a highly significant part of the network. Although relatively undisturbed, in the absence of intervention, the site is at significant risk of becoming unsuitable due to flooding and sea level rise.

7.56 Therefore, the Strategy proposes to secure a Winter Bird Reserve at Northney Farm within the more significant/preferred habitat areas of the site in-perpetuity (defined as 80 years), and will comprise the following key objectives which would be funded by the development at Campdown:

- Design and implement long-term sea defences to safeguard the reserve;
- Secure long-term access management to maintain low levels of disturbance;
- Secure long-term management to maintain habitat suitability;
- Provide long-term benefits to public awareness and education;
- Provide long-term monitoring.

7.57 As part of the sea defence strategy, a planning application has been submitted to the Council separately for the creation of an inner bund within the Northney Farm site. Other smaller bunds are proposed but these are not considered to require planning permission. The location of the bunds has been carefully considered to maximise the enhancement of the existing habitat in the longer term.

7.58 The delivery and long-term management and monitoring of the Winter Bird Mitigation Area will be secured via legal agreement in perpetuity (defined as 80 years), with the landowner retaining ownership. The delivery mechanism will be through the proposed Section 106 legal agreement linked to the this planning application. This will include a specific Schedule relating to Northney which will include reference to the following key provisions:

- Detailed sea defence measures;
- Detailed habitat and access management measures (including capital works and maintenance);
- Detailed monitoring programme;
- Detailed cost breakdown and commuted sum for capital works;
- Detailed cost breakdown and commuted sum (or alternative funding mechanism) for long term management and monitoring.
- Mechanism for establishment of the Delivery Group including timescales; and
- Mechanism for Havant Borough Council to take undertake enforcement.

7.59 The mitigation report concludes that there should conclude no adverse impact on integrity of wider habitat and therefore it is consistent with relevant development plan policies, and the presumption in favour of sustainable development remains.

Biodiversity

7.60 This application is accompanied by a Biodiversity Net Gain report prepared by Tetra Tech. This assessed the existing habitats of the site which comprise grazed neutral

semi-improved grassland with areas of dense scrub and scattered scrub, scattered semi mature trees, standing water as well as intact and defunct hedgerows comprising mature and semi-mature trees. Based on the submitted proposals, the development would result in a net gain of 5.17 habitat units (4.47 %) and a net gain of 7.98 hedgerow units (6,765.20 %).

- 7.61 The current layout of the site, in conjunction with on-site mitigation, shows that a measurable gain will be achieved.

Ecology

- 7.62 The site has the potential to support a number of protected species including roosting, hibernating and foraging/commuting bats, dormice and reptiles.

- 7.63 In order to provide suitable mitigation to off-set the impacts of development, the submitted proposals include:

- Compensation for the loss of functionally linked habitat for overwintering birds associated with Chichester and Langstone Harbours SPA.
- Construction and operational drainage strategies to avoid the risk of pollution of European sites.
- Financial contribution to the Solent Recreation Mitigation Strategy.
- Purchase of nutrient credits to achieve nutrient neutrality.
- Habitat enhancement and creation to mitigate the loss of grassland and scrub habitats.
- European Protected Species Mitigation licence for hazel dormice with detailed method statement, to ensure retention of vegetation and connectivity throughout the site and beyond. This must be obtained prior to commencement of any works on site.
- A reptile translocation to the retained habitat in the north of the site.
- A pre-commencement survey for badgers, trees for new potential bat roosting features and Schedule 9 invasive non-native plant species.
- Any vegetation removal must take place outside of the nesting bird season (1st March to 31st August) and in line with the dormouse mitigation strategy.
- In line with national and local planning policy the site will be enhanced for biodiversity. Measures include bat and bird boxes, native species planting, creation of species rich grasslands and addition of habitat piles and hiberacula for reptiles.

- 7.64 Provided the measures within this report for further survey and mitigation can be adopted, it is anticipated that a design could be brought forward for this site that would be compliant with current local and national biodiversity planning policy.

Nutrient Neutrality

- 7.65 There is the potential for works to affect Chichester and Langstone Harbours Ramsar and SPA, Solent Maritime SAC and Isle of Wight Lagoons SAC as the site is within the East Hampshire Rivers
- 7.66 Catchment. This catchment has a downstream hydrological connection with the described designated sites.
- 7.67 Any development that results in a net increase in the population served by a wastewater system will need to demonstrate 'nutrient neutrality' as a method of avoiding any adverse effects on the integrity of these sites.
- 7.68 A Nutrient Neutrality budget report has been prepared which concludes that the proposals will generate an excess loading of 772.72kg TN/year. Therefore, the proposals will need to provide suitable mitigation to demonstrate 'nutrient neutrality'. It is proposed that this will be in the form of both on-site mitigations, and the purchase of off-site mitigation in the form of credits.

Arboriculture

- 7.69 Paragraph 131 of the Framework acknowledges that trees make an important contribution to the character and quality of urban environments and that they can also help mitigate and adapt to climate change. Paragraph 174 states that planning decisions should contribute to and enhance the natural and local environment by *"recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland."*
- 7.70 Policy CS11 states that planning permission will be granted for development that includes planting of new trees. Policy DM8 states that development will be permitted where it protects natural features including trees.
- 7.71 This application is supported by an Arboricultural Report and Tree Protection Plan prepared by Barrell Tree Care which concludes that the proposed development would not cause an unacceptable or adverse impact on the character and appearance of the area from a tree perspective.

Heritage and Archaeology

Heritage

- 7.72 Paragraph 195 of the Framework states that *"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."*
- 7.73 Reflective of the Framework, Policy DM20 (Historic Assets) states that planning permission will be granted for development that conserves and enhances the historic

assets of Havant Borough. Policy CS11 (Protecting and Enhancing the Special Environment and Heritage of Havant Borough) states that permission will be granted for development that protects and where appropriate enhances the borough's statutory and non-statutory heritage designations by appropriately managing development in or adjacent to listed buildings and scheduled ancient monuments.

- 7.74 As previously mentioned, a separate pre-application meeting was held between the applicant and Heritage England who welcomed that no development was proposed within or immediately east or west of the Scheduled Roman Villa site, and that the intention was to create some viewing corridors from the Scheduled Roman Villa site and the Scheduled Long Barrow to the south to be maintained.
- 7.75 As part of this submission, a Heritage Statement and an Archaeology Assessment (prepared by MOLA) have been prepared. The report concludes that the proposed development will not impact directly upon the Scheduled Roman villa site, Bevi's Grave Long Barrow, and Fort Purbrook including the covered-way to the east, the Grade 2 listed The Towers, now known as Belmont Castle Care Home, or the former site of Farlington Redoubt.
- 7.76 The report concludes that the proposed development would have no direct impact upon any of the significant interests which afford the heritage assets' their designations.
- 7.77 On the basis of the above, it is considered that the application complies with the requirements of policies DM20 and CS11.

Archaeology

- 7.78 This application is supported by desk-based archaeology assessment (prepared by MOLA).
- 7.79 The report concludes that any disturbance associated with the proposed development is likely to involve levelling groundworks, the excavation of building footings, service trenches, access roads and car parking, as well as landscaping. The proposals steer clear of the Scheduled Monument to the north of the site so would not have any impact on the below ground remains north of the route of the Roman road.
- 7.80 The report notes that further archaeological work would be required in advance of the proposed development to investigate potential deposits.

Infrastructure

Transport and Highways

- 7.81 The Framework sets out at paragraph 110 sets out the key transport considerations that should be taken into account when determining planning application including appropriate opportunities to promote sustainable transport, delivering safe and suitable access into the site alongside incorporate appropriate parking layouts into proposed developments.

- 7.82 Furthermore, paragraph 111 that *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*
- 7.83 Policy CS20 of the Core Strategy states that development will be permitted where the scheme *“Provides transport management measures to ensure the safe and efficient operation of the strategic and local road network.”* and *“Ensures that highway design responds positively to the characteristics of the area and delivers a high-quality public realm for all users.”*

Highways Impact

- 7.84 Section 6 of the Transport Statement (‘TA’) sets out the trip generation associated with the proposed development. Given the small scale of the community space proposed and the anticipated catchment, combined with limited peak period traffic impact, this has been considered ancillary to the development (200m²) and has not been assessed as part of the TA.
- 7.85 Table 5 within the TA illustrates that the proposed development is expected to generate 305 vehicle trips in the AM peak hour and 328 vehicle trips in the PM peak hour. Across a day, the development is expected to generate 2,815 vehicles over a 12-hour period.
- 7.86 The TA demonstrates that the proposed development is expected to result in an increase in vehicles across both peak hours and a 12-hour period. However, this represents a lesser number of additional trips when compared to the previous application (submitted by Persimmon Homes). The development will also generate additional walking, cycling and public transport trips, however these are expected to be absorbed by existing and proposed infrastructure surrounding the site.

Offsite Works

- 7.87 Policy CS21 (Developer Requirements) states that development will be permitted if on-site and/or offsite infrastructure requirements are met. The supporting TA details the proposed offsite works and how they will be delivered.

Site Access

- 7.88 The proposed development incorporates the provision of signalised junction, which was agreed as the most suitable junction required to serve the development as part of the application submitted by Persimmon Homes (APP/19/01101).
- 7.89 The signalised junction has been designed in accordance with DMRB (Design Manual for Roads and Bridges) CD 123 junction design guidance. Details of the site access arrangements are shown on plan reference: 147.0008.0005 Rev P01.
- 7.90 In addition to the Transport Statement, this application is supported by a number of swept path analysis plans with regard to refuse and fire tender tracking (prepared by RCP) which demonstrates that the internal road network is sufficient to meet the requirements.

Car Parking and Cycle Provision

- 7.91 Policy DM13 of the Core Strategy states that *“Residential development will only be permitted where it provides car parking and cycle storage in accordance with the standards set out in the Residential Car Parking and Cycle Provision Supplementary Planning Document.”*
- 7.92 The TA has demonstrated that the site is well served by cycling and pedestrian infrastructure. Regular bus services are available via bus stops along College Road providing services to a range of destinations. Bedhampton railway station is located with a 35-minute walk or 9-minute cycle, with the journey times expected to reduce following the development proposals. Therefore, there are good opportunities to encourage a modal shift from private car to sustainable modes
- 7.93 The TA also details the proposed vehicular and cycle parking provision within the site and how the proposed development accords with the requirements of Policy DM13 and is in-line with HBC parking guidance.

Pedestrian and Cycle Accessibility

- 7.94 Paragraph 105 of the Framework focuses upon delivering new development in locations that are or can be made sustainable and through offering a genuine choice of transport modes.
- 7.95 In response to this, Policy CS16 of the Core Strategy states that developments should demonstrate that its design *“Is well connected to and integrates with the immediate local area and the wider area by linking to existing pedestrian and cycle routes and encouraging people to use public transport where possible.”*
- 7.96 Similarly, Policy CS9 states that planning applications will be granted for housing where they *“Achieve a suitable density of development for the location, taking into account accessibility to public transport and proximity to employment, shops and services in addition to respecting the surrounding landscape, character and built form.”*
- 7.97 Policy DM11 of the Core Strategy states that the Council will seek to ensure that every opportunity is taken to increase integration of sustainable travel modes and availability of non-motorised modes by appropriate measures.
- 7.98 Policy DM12 of the Core Strategy requires new developments to mitigate travel impacts, including environmental impacts of travel and impacts on amenity, health and climate change.
- 7.99 The supporting TA and Travel Plan demonstrates that the proposed development contributes towards encouraging sustainable travel through walking, cycling and public transport and is consistent with the relevant policies of the Core Strategy.
- 7.100 On the basis of the above, it is considered that the application complies with all relevant highways policies, as referred to above.

Environmental

Flooding

- 7.101 Paragraph 153 of the Framework states that *“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures⁵³. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”*
- 7.102 Core Strategy Policy CS15 (Flood and Coastal Erosion Risk) states *“All development will be required to ensure that there is no net increase in surface water run-off. Priority should be given to incorporating Sustainable Drainage Systems (SuDS) to manage surface water drainage, unless it is proven that SuDS are not appropriate. Where SuDS are provided arrangements must be put in place for their whole life management and maintenance.”*
- 7.103 The policy also requires developments to provide a site-specific flood risk assessment which demonstrates that the development will be safe, including the access, without increasing flood risk elsewhere, and where possible will reduce flood risk overall.
- 7.104 In response to these requirements, the application is supported by a Flood Risk assessment (prepared by RCP) which demonstrates that the proposals will not generate an increased risk of flooding and will not increase the risk of flooding elsewhere.

Drainage

- 7.105 We note that policy CS15 also requires new site drainage systems to be designed taking into account of events which exceed the normal design standard. A preliminary design surface water drainage strategy has been prepared and hydraulically modelled which demonstrates that the redevelopment proposals can be successfully implemented and designed to withstand the impact of a 1:100-year rainfall event (including 45% climate change allowance), in accordance with the NPPF. PPG and HCC requirements.
- 7.106 The drainage strategy prepared by RCP in support of this application provides further details. On the basis of the above, it is considered that the application complies with the requirements of Policy CS15.

Utilities

- 7.107 This application is supported by a utilities assessment prepared by Connect It which assesses the existing utility assets identified in the vicinity of the proposed development site, based on the results of utility searches carried out by Connect It.

Ground Investigation

- 7.108 Core Strategy Policy DM17 (Contaminated Land) states that planning permission will be granted for development on or near contaminated land where an appropriate investigation of potential risks is undertaken by the developer and identified risks are mitigated.

- 7.109 This application is supported by a Contaminated Land Investigation Report (prepared by RSK) which concludes that ground conditions present at the site are suitable for the proposed end use.
- 7.110 On the basis of the above, it is considered the application is in accordance with Policy DM17.

Unexploded Ordnance

- 7.111 A study for potential historic Unexploded Ordnance (UXO) contamination has also been undertaken (prepared by EOD Contracts Ltd). The study assessed the likelihood of buried EO/UXO within the site, in view of further development. The report concludes that the overall risk level on the site is medium, given that some UXO retains the potential to detonate if disturbed with possible severe consequences, it is concluded that it would be prudent to ensure that basic precautions are taken to ensure that the project can proceed in the safest possible manner and that any residual risk posed by UXO is as low as it is reasonably practical to achieve.
- 7.112 On the basis of the above, it is considered that the application complies with the requirements of policy DM17.

Minerals Safeguarding

- 7.113 Paragraph 210 of the Framework requires Mineral Planning Authorities to define Mineral Safeguarding Areas (MSA) and Minerals Consultation Areas (MCA) when preparing local plans.
- 7.114 This application is supported by a minerals safeguarding statement (prepared by Tetra Tech) to assess the most suitable method of management of any identified clay resource at the site. The report concludes that minerals extraction will be viable at the site and recommends that as much site derived materials is reused on site as possible. This would have sustainability benefits as it could reduce the number of Heavy Goods Vehicle movements required for the site's construction.
- 7.115 It is considered that the application complies with relevant policies as set out in the Hampshire Minerals and Waste Plan (2013).

Air Quality

- 7.116 Paragraph 186 of the Framework states that planning decisions should *"sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas."*
- 7.117 Policy DM10 (Pollution) states that developments that may cause pollution will only be permitted where the health and safety of existing and future users of the site, or nearby occupiers and residents is not put at risk and then national air quality standards or objectives would not be breached.
- 7.118 Policy DM18 (Protecting New Development from Pollution) states that planning permission will be granted for development provided that projected levels of air pollution do not have a significant negative affect on the amenity of future occupiers or users of the development.

- 7.119 This application is supported by an Air Quality Assessment (prepared by Omnia Consulting). The report concludes that following consideration of the residual impacts of the operation of the development, these were considered to be not significant, in accordance with the IAQM guidance. The report continues by stating that although impacts were predicted to be not significant, a number of mitigation measures were identified in order to further reduce vehicle exhaust emissions associated with the development. This will minimise effects as a result of the development in accordance with the requirements of HBC.
- 7.120 On the basis of the above, it is considered that the proposed development complies with the requirements of Policy DM10.

Noise

- 7.121 Paragraph 185 of the Framework states that planning decisions should “*ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.*”
- 7.122 Core Strategy Policy CS16 (High Quality Design) requires development to demonstrate that the development will not cause unacceptable harm to the amenity of neighbours through noise.
- 7.123 Policy DM18 (Protecting New Development from Pollution) states that planning permission will be granted for development provided that projected levels of noise pollution do not have significant negative effects on the amenity of future occupiers of users of the proposed development.
- 7.124 This application is supported by a Noise Assessment prepared by 24 Acoustics.
- 7.125 The proposed development is subject to road traffic noise from the A3(M) and College Road. An acoustic fence has been incorporated into the design along the eastern site boundary to minimise noise levels from the motorway.
- 7.126 The site layout has been developed with noise in mind with apartment blocks along the eastern side of the site which will screen more westerly dwellings from road traffic noise and orientation of dwellings along College Road to allow rear gardens to be screened from road traffic noise by the dwellings themselves.
- 7.127 Where required, noise mitigation measures have been incorporated for dwellings to ensure acceptable levels of noise are achieved both internally and externally. It is likely that the Proposed Development will provide some screening for existing dwellings to the west of College Road from road traffic noise associated with the A3(M).
- 7.128 The report submitted as part of this application concludes that an appropriate acoustic environment can be provided to the proposed residential properties, both externally and internally within the development.
- 7.129 On the basis of the above, it is considered that the proposed development complies with Core Strategy policy CS16 (High quality Design) in respect of noise.

Lighting

- 7.130 Paragraph 185 of the Framework states *“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”*
- 7.131 Policy CS8 (Community Safety) of the adopted Core Strategy states that permission will be granted for proposals that provide well-lit footpaths, cycle ways and roads providing that this does not adversely affect designated habitats or the landscape.
- 7.132 Policy DM18 (Protecting New Development from Pollution) states that planning permission will be granted for development provided that projected levels of light pollution do not have significant negative effects on the amenity of future occupiers of users of the proposed development.
- 7.133 This application is supported by a lighting strategy (prepared by MMA) which assesses, in terms of artificial lighting, the likely effects of the proposed development. The assessment concludes that a compliant lighting scheme can be designed and installed with an acceptably low impact on the surrounding residential properties, sensitive boundaries, and wildlife. The likely cumulative effect of artificial lighting may be a slight increase in sky glow. However, given the baseline situation in the surrounding area to the development overall effects are not likely to be visual. On this basis, the proposals are considered to accord with the above policies.

8. Affordable Housing Statement

- 8.1 This Section considers the level of affordable need within the Borough, together with the extent of provision, tenure mix, distribution, and form (size) of the units proposed.
- 8.2 The purpose of this statement is to provide the local planning authority with information regarding the provision of affordable housing within the proposed development and the justification for that provision.
- 8.3 This Affordable Housing Statement should be read in conjunction with the remainder of the Planning Statement and with the other supporting documents, including the Design & Access Statement, which provide further clarification in respect of the residential scheme being proposed.

Planning Policy

- 8.4 The definition of 'affordable housing' is set out with the National Planning Policy Framework (NPPF) and includes 'affordable housing for rent,' 'starter homes,' 'discounted market sales housing' and 'other affordable routes to home ownership.'
- 8.5 The relevant local planning policy relating to the need for and provision of affordable housing can be found in the Havant Borough Council Core Strategy, which was adopted in March 2011. CS9 sets out the planning permission will be granted for housing proposals that will deliver an average of 30-40% affordable housing on sites of 15 dwellings or more. It requires proposals to ensure mixed communities are created through the planned distribution and avoidance of a concentration of affordable housing. Affordable Need within Havant Borough.
- 8.6 In addition, the Housing Delivery Position Statement, which as highlighted above identifies the principle of residential development of the site, as well as others that were formally allocated in the withdrawn Local Plan, includes specific criteria requirements that will apply depending on the scale of development. In this instance, it identifies the site would be expected to provide 30% affordable housing
- 8.7 Paragraph 6.15 of the withdrawn Havant Borough Council Local Plan acknowledges that there is a large need for affordable housing within the Borough. As a result of this identified need the Council have acknowledged they will need to maximise the delivery of housing products which would meet genuine affordable housing need and make all housing more affordable.

Havant Borough Council Housing SPD (2011)

- 8.8 The Council adopted their Housing SPD in 2011 which provides guidance for type, size and tenure of housing to provide for and meeting need of residents within Havant Borough. One of the priorities of the SPD is to meet the housing needs of the borough and to plan for everyone to have access to a decent home, with particular regard to those in need of affordable housing.

Specialist Housing Analysis (July 2020)

- 8.9 The Council published their Specialist Housing Paper in July 2020 which formed part of the production of the (now withdrawn) emerging Havant Borough Council Local Plan ('HBLP') which provides an up-to-date evidence base for the different size, type, and range of housing that is required to meet the need in Havant Borough.
- 8.10 Paragraph 2.11 of the report states that according to waiting list data *"the combined total need for affordable homes is 2,735 dwellings within the Borough. There is a significant need for affordable dwellings, and the supply of affordable homes should be maximised accordingly."*
- 8.11 The report continues but identifying that there is a greater need for affordable rented homes than intermediate affordable homes, with the SHMA suggesting a need for 74% social/affordable rent and 26% intermediate rent.
- 8.12 The report concludes at paragraph 2.17 that there is an acute need for two-bedroom properties in both the market sector, and the affordable sector where there is generally a deficit of two-bedroom properties relative to locally assessed needs.

Building a Better Future Plan – the new Local Plan for Havant Borough

- 8.13 The Council undertook Regulation 18 consultation on their '*Building a Better Future Plan*' consultation document. As part of work on the new emerging Local Plan, we understand that the Council intends to commission further evidence to provide up to date information on the current needs for affordable housing, including for different types and tenures of affordable housing, and how they can be met in the Borough.

Affordable Housing Delivery at Campdown

- 8.14 The proposed development will provide up to 30% affordable housing on site (188 affordable homes). The proposed level of affordable housing is in accordance with Policy CS9 of the adopted Havant Borough Council Core Strategy (2011).
- 8.15 The table below sets out the proposed provision of affordable housing as part of the development.

Table 3 Affordable Housing Mix Proposed

Dwelling size	No. of dwellings
1 Bedroom Flat	39
2 Bedroom Flat	66
2 Bedroom Coach House	13
2 Bedroom House	19
3 Bedroom House	49
4 Bedroom House	2
TOTAL:	188

- 8.16 There is an acute need for affordable housing within the Borough, as evidenced by the Council themselves. The provision of 188 affordable units will make a highly significant contribution to meeting this need and should accord significant weight.
- 8.17 In addition, the applicant contends that the proposed mix of affordable housing proposed is appropriate given the high level of need for 2-bedroom properties. The proposed mix will deliver a total of 98 2-bedroom affordable homes which will assist in meeting local needs.

9. Draft Heads of Terms

- 9.1 Paragraphs 55 to 58 of the NPPF (2021) confirm that planning obligations or conditions can be used to make otherwise unacceptable development acceptable in planning terms. Paragraph 54 confirms that *“planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.”*
- 9.2 Paragraph 56 outlines three tests which planning obligations must meet, these include:
- (a) *“necessary to make the development acceptable in planning terms;*
 - (b) *directly related to the development; and*
 - (c) *fairly and reasonably related in scale and kind to the development.”*
- 9.3 It is understood that the Council do not currently have a Developer Contributions SPD but have adopted CIL. The applicant is aware that the proposed development will be CIL liable and may be subject to a number of Section 106 obligations which are to be discussed and agreed with Havant Borough Council and relevant third parties and are subject to meeting the relevant tests.
- 9.4 In addition to the required provision of Community Infrastructure Levy (£80 per sqm), the development will provide S106 contributions toward necessary infrastructure and related community initiatives, subject to meeting appropriate policy tests to demonstrate justification.
- 9.5 At this stage it is considered this may include securing the following (tbc):
- Securing off-site wintering bird mitigation enhancement at Northney Farm
 - Contributions toward education infrastructure provision where capacity does not exist;
 - A Travel plan to encourage alternative modes of transport to a car;
 - The Solent Disturbance and Mitigation Project; and
 - Supporting local people in accessing employment and skills training (alternatively a site-specific skills and employment plan will be submitted with the application)

10. Conclusions

- 10.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 is clear in requiring that planning applications should only be approved where they accord with the Development Plan, unless material considerations indicate otherwise.
- 10.2 This Planning Statement has been prepared by Turley on behalf of Dandara Southern Limited in support of a detailed planning application submitted to Havant Borough Council for residential development at Land east of College Road, Campdown, Purbrook.
- 10.3 The description of development is as follows:
- “Detailed application for mixed use residential development comprising 628 dwellings, community centre, allotments, public open space including play areas, new junction to College Road, related internal access roads, footways and cycleways, pumping station and drainage basins.”*
- 10.4 The Planning Statement has assessed the proposals against the relevant development plan policies and other material considerations. The principle of the residential development of the site of this broad scale has been established by virtue of its identification within the Housing Delivery Position Statement. Although not part of the development plan, it is recognised as an important material consideration in the absence of a five-year housing land supply.
- 10.5 The proposals have been sensitively developed through pre-application engagement with HBC and key statutory consultees: Historic England, Natural England and Hampshire County Council as highway authority. In addition, engagement has been undertaken with the local community and local ward Councillors. This has enabled clarification of key constraints and opportunities and appropriate adjustment of the layout and provision of mitigation to address matters raised.
- 10.6 Great care has been taken in developing a layout that is of high quality, with an emphasis on creating attractive well-connected neighbourhoods, with access to extensive open space, play space, allotments and community facility, and a development that sits sensitively in the wider landscape. It is therefore considered to accord with relevant development plan policies and guidance aimed at providing suitably designed developments.
- 10.7 The proposals are considered to have addressed all key technical matters and accord with relevant development plan policies, and the relevant criteria of the Housing Delivery Position Statement.
- 10.8 Notwithstanding, as the Council cannot currently demonstrate a five year supply the presumption in favour of sustainable development applies in accordance with national guidance. Given the location of the site, combined with the provision of facilities as part of the development, it should be regarded as sustainable development.

- 10.9 As set out above, although the site does include important habitat for Brent Geese and wading birds, it is considered the presumption in favour of sustainable development still applies given the mitigation proposed on an alternative site at Northney Island, which is considered will demonstrate through an appropriate assessment that the plan or project will not adversely affect the integrity of the overall habitat in the locality.

Planning Balance

- 10.10 Whilst the proposals are considered to accord with the development plan, it is also relevant to consider the overall planning balance. The application of the presumption in favour of development requires that the adverse impacts of any development should significantly and demonstrably outweigh the benefits for it to disapply. As such, the planning balance assessment necessary is tilted in favour of granting planning permission.

The benefits of the proposed development are summarised below:

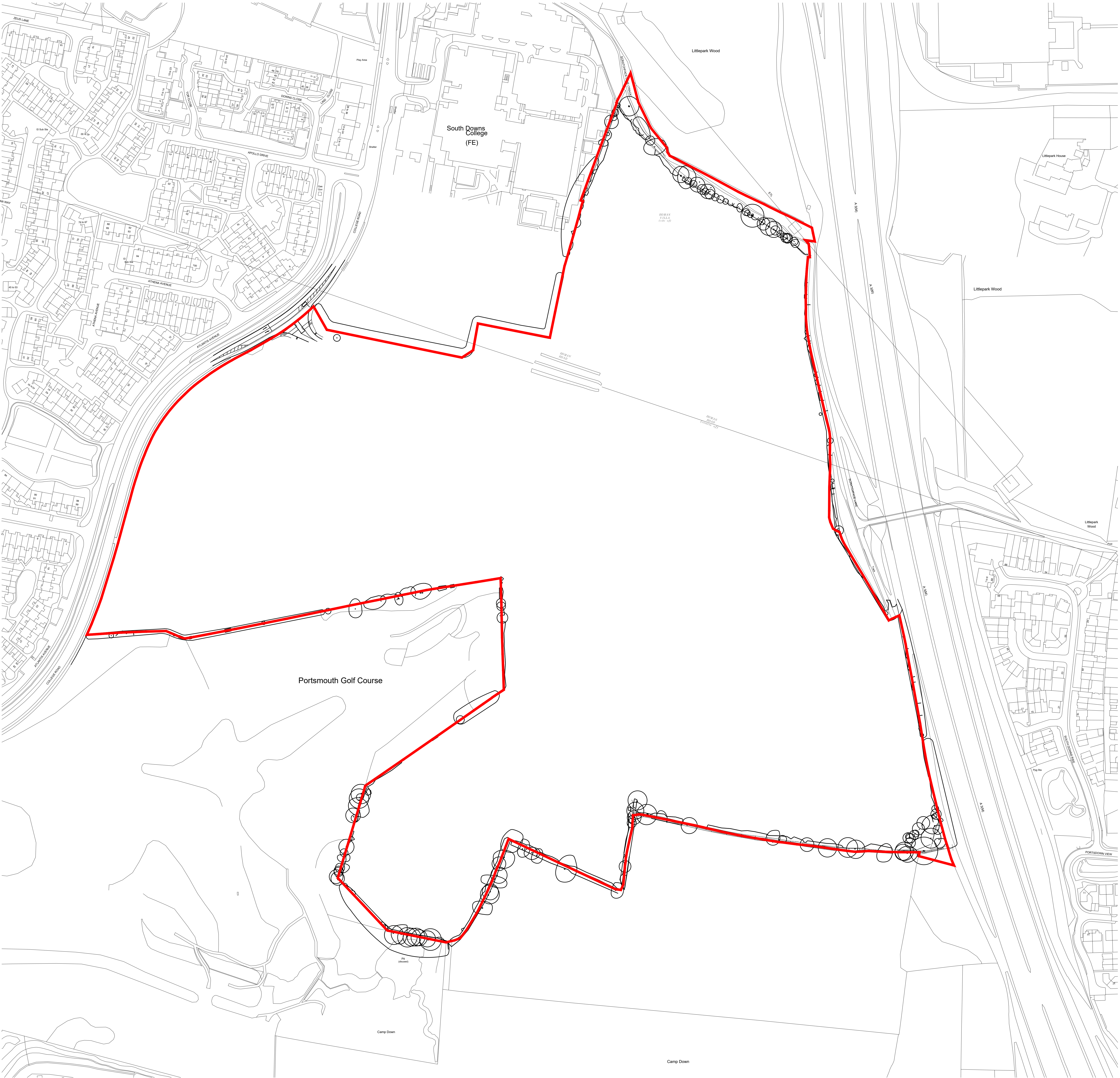
- The provision of 628 dwellings against a severe shortfall in five-year housing supply should be accorded **substantial** weight;
- The provision of 188 affordable dwellings to meet a acute shortage of affordable housing should be given **substantial** weight;
- The delivery of extensive areas of public open space above and beyond policy requirements for the benefit of both new and existing residents should be given **significant** weight;
- The provision of allotments and community centre should be accorded **positive** weight, acknowledging this was a policy aspiration in any case ;
- The proposals will deliver direct benefits in terms of job creation and investment from the construction phase, together with future occupiers increasing activity within the local economy through local spending and additional Council Tax revenues and New Homes Bonus receipts. The should be accorded **significant** weight given the scale of the development proposed.

- 10.11 It is acknowledged that the proposal will have some adverse impacts, however these have been mitigated and are not considered significant. These are outlined below:

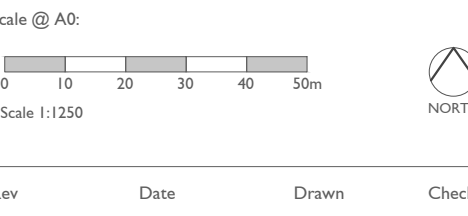
- Some landscape impact is inevitable given the development of a greenfield site. However, the careful integration within the landscape setting minimises any significant impact;
- In regard to heritage, there will be some indirect impacts on the setting of the heritage assets. However, these have been minimised through the careful consideration of the layout and the distribution of land uses.
- As a consequence of the development of the site, some adverse impact on the existing wintering bird habitat is inevitable. However, the quality of the habitat is not considered significant, and can be suitably mitigated through enhancements to an alternative site at Northney Farm, secured as part of a legal obligation.

- 10.12 However, these adverse impacts cannot be considered to significantly and demonstrably outweigh the benefits.
- 10.13 Therefore, on this basis it is considered that the proposals should be granted planning permission.

Appendix 1: Location Plan



1:1250 Location Plan
Site Boundary
66.102ac / 26.751ha
what3words:
///this.latest.doing



Date: NOVEMBER 2022
Drawn by: MAH
Checked by: BB
Dwg No: CB_62_265_000
Rev: -

Project: CAMPDOWN, RURBROOK, PORTSMOUTH
Title: SITE LOCATION PLAN
Client: dandara
COOPERBALLIE

Appendix 2: HBC Pre-application Response

Mr. S Packer

Our Ref: GEN/22/00557
Direct Line: (023) 02392 446513
Ask For: Mr G Christie
Email: planning.development@havant.gov.uk

23 September 2022

Site Location: Land East Of, College Road, Purbrook, Waterlooville

Re: Development of 653 dwellings, a community centre, allotments, open space, play space, trim trail, landscaping, internal access roads and footways, and related parking.

Dear Mr Packer

I write further to your enquiry received on the 17 June 2022 regarding the above site. Please accept our apologies for the delayed response.

The submission is supported by a pre-application Design & Access Statement, a Sketch Layout Plan, an Ecology Summary, a Highways Position Statement and a letter in respect of Archaeology. Following an initial meeting on 1st August 2022, a set of specific questions relating to the proposal was also provided on 30th August 2022. These are also addressed in turn below.

I have now had the opportunity to review the submitted documents, consultation responses received specifically in respect of this proposal, those provided in respect of planning application APP/19/01101, and offer the following observations:

Policy Status

The Local Plan (Core Strategy) and the Local Plan (Allocations), together with the Hampshire Minerals and Waste Plan (HMWP), provide the development plan for the Borough. The following policies are of particular relevance:

- CS9 – Housing
- CS16 – High Quality Design
- CS17 – Concentration and Distribution of Development within the Urban Areas
- CS21 – Developer Requirements
- DM1 – Recreation and Open Space
- DM10 – Pollution
- DM13 – Car and Cycle Parking in Residential Development
- DM23 – Sites for Brent Geese and Waders
- DM24 – Recreational Disturbance to Special Protected Areas (SPAs) from Residential Development
- AL1 – Presumption in Favour of Sustainable Development
- AL2 – Urban Area Boundaries and Undeveloped Gaps between Settlements
- Policy 15: Safeguarding – mineral resources (HMWP)

The site was previously identified as a housing site within the emerging Havant Borough Local Plan (HBLP) for around 650 dwellings under Policy H40, and was subject to further site-specific guidance under Policy E17 in relation to Solent Waders and Brent Geese. However, the emerging HBLP was formally withdrawn by the Council on 16th March 2022 following the Inspectors findings and recommendations. Whilst the Council works towards a revised Local Plan, and to provide clarity on how planning applications will be determined in the meantime, a Housing Delivery Position Statement (HDPS) was also adopted on 16th March. The HDPS will be a material consideration in the determination of planning applications.

Principle of Development

In the adopted Local Plan, the site lies outside of the urban area as defined by policies CS17 and AL2. These policies seek to restrict development in these locations, except in exceptional circumstances. It is not considered that any of the exceptions in the policy apply here, the proposal being a major residential development on greenfield land.

The HDPS indicates that the Council will continue to support the principle of housing development on emerging site allocations that were previously included in the emerging HBLP, including that of Campdown, site reference WV6 within Table 1.

Decision Making Principle 2 of the HDPS sets out that proposals coming forward on Table 1 sites will be:

- Required to meet the remaining requirements of the Development Plan; and
- Expected to comply with the Decision Making Principles set out in the Position Statement.

In order to justify a departure from the Development Plan, the development proposals will be expected to demonstrate compliance with the development quality standards set out under Decision Making Principle 5. These developer requirements replicate those previously included in the now withdrawn HBLP. In this respect, reference to a number of those requirements in the Design and Access Statement including biodiversity net gain are supported. Any subsequent application should be accompanied by a 'development quality standards checklist' which sets out how the application will comply with the requirements of Decision Making Principle 5.

In addition, and notwithstanding the retained indicative suggested yield of 650 dwellings, any development proposal will need to demonstrate how concerns raised in the Interim Findings Report of the Examination of the withdrawn HBLP which are material to the site in question have been assessed, and overcome. Paragraphs 36 to 40 of the Inspectors' Interim Findings report specifically comment on the proposed allocation of Campdown (H40):

"36. Campdown is proposed to be allocated for around 650 dwellings under Policy H40 and is subject to further site-specific guidance under Policy E17 in relation to Solent Waders and Brent Geese. A planning application (Ref APP/19/01101) was submitted in relation to this site in late 2019, although this has not yet been determined. The site is subject to outstanding objections from both Natural England and Historic England.

37. In relation to Solent Waders and Brent Geese, parts of the Campdown site are identified as a 'primary support area' and a 'secondary support area', and it comprises 'Functionally Linked Land'. It also has particular importance for Curlews, which are a difficult species to mitigate for. In this regard, Natural England has expressed significant concern as to whether its function is capable, in principle, of being adequately replaced elsewhere.

38. Whilst the site promoter stated at the hearings that they were at an advanced stage in securing a mitigation site, it is not in the public domain, nor have Natural England or the Council's ecologist had the chance to consider its merits. Moreover, the Council has suggested deleting the cross references to Warblington Farm providing mitigation for the site

in Policies E17 and H40. In these circumstances, it is unclear whether Campdown is capable of being adequately mitigated with reference to Curlews. Accordingly, it is our view that the site does not currently meet the definition of 'deliverable' or 'developable' as set out at Annex 2 of the NPPF. On this basis, 650 dwellings should be removed from the Council's anticipated supply.

39. Separately, there are 3 Scheduled Monuments either within or in close proximity to Campdown. In this regard, the site largely surrounds a scheduled Roman villa on 3 sides and contains part of the alignment of a Roman road. In their representations, Historic England state that encroachment into the surrounding open area has the potential to impact on the understanding of the Villa and how it functioned, and the current appreciation of the site. Accordingly, Historic England advise that further work be undertaken to fully assess the contribution of the setting of the 3 Scheduled Monuments to their significance. The Council propose to address this concern by including a requirement in Policy H40 for a 'Setting Study' to be submitted at the planning application stage.

40. However, in the absence of this study, it is unclear how much land would need to be left open in order to satisfactorily address the settings of these Scheduled Monuments. In this regard, we note that despite ongoing discussions since the submission of application Ref APP/19/01101, and a downward revision in the yield of that proposal from 780 to 664 dwellings (a very similar figure to that proposed in the Local Plan), Historic England's objection remains extant. Accordingly, there is a real possibility that this capacity could be reduced further once the Setting Study has been produced. In these circumstances and even if our other concerns could be overcome, we also consider that the assumed contribution of 650 dwellings from this site is likely to be overly optimistic."

Whilst now formally withdrawn proposed Policy H40 of HBLP does provide a useful summary of Site Opportunities and Constraints and the developer requirements which still remain relevant to any future planning application. This can be found [here](#).

Five year housing land supply:

The Council's Five Year Housing Land Supply Update (November 2021) indicates the Council has 3.9 years supply with a 20% buffer applied. This is below the five year supply threshold, and as such there is a presumption in favour of sustainable development (para 11d of the NPPF). The tilted balance means that permission should only be refused where:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

The NPPF clarifies that policies referred to that protect areas or assets of particular importance include: habitats sites and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change.

In this instance, impacts on Solent European sites (either or alone or in combination with other plans or projects) and heritage assets would be particularly relevant and the tilted balance would not be applicable where the proposal would not protect areas or assets of particular importance. The issues of impact on Solent European sites and heritage assets are addressed in more detail below.

Furthermore, following the receipt of the Inspector's Interim Findings which raise concerns about the uncertainty of the site's delivery, the proposed scheme is not included in the Council's five year housing land supply either in whole or part. Whilst the proposed development has the potential to increase housing supply in the short term, this is subject to

details of an appropriate replacement mitigation site being provided. Given the larger nature of the site, the scheme would not be delivered in its entirety within the first five years. Though it is acknowledged that it would be possible for completions to begin within this period, subject to the replacement habitat site being provided.

Even in the context of the 5 year supply position, a number of matters will have to be carefully addressed to support a departure from the development plan.

Ecology

As set out above, parts of the site are identified as a Primary Support Area and Secondary Support Areas for Solent Waders and Brent Geese (SWBG) within the Brent Goose and Wader Strategy (October 2018) (SWBGS), with particular importance for Curlews.

The Solent's Special Protection Areas are designated in part due to the assemblages of Brent Geese. As such, a project level Habitat Regulations Assessment (HRA) will need to be carried out and inform any package of avoidance and mitigation measures for Solent Waders and Brent Geese, to determine levels of impact, alone and in combination with other plans and projects.

Offsetting areas to fulfill the same special contribution and particular function of the areas lost or damaged for the same species of birds will be judged against the following criteria, ranked in order of importance:

- A. Habitat Type – the proposed off setting site must support habitats, or be suitable for recreating habitats that provide the same, or enhanced, ecological function as those that are to be lost or damaged.
- B. Disturbance – the ecological function of an off-setting site is likely to be seriously undermined if subject to regular disturbance from recreational use and unmanaged public access. The appropriateness of the location of the off-setting site and the proposed measures to prevent indirect effects will need to be fully assessed.
- C. Area of habitat – where the replacement habitat would be of equal ecological quality the area required should be of a similar extent to the site being lost or damaged. There may be situations however, where a greater area is required when habitat created may be of poorer quality to that lost or damaged, or there is a high level of risk involved. Similarly, if significant ecological enhancements are possible that increase the carrying capacity of the replacement site above that of the Primary Support Area affected then a smaller area of replacement habitat might be acceptable. This might include the partial loss of a Primary Support Area providing the remainder can be made significantly improved in habitat quality with long term management so as to provide for a greater capacity for the target species than the original site. In all such cases the test will be to ensure the replacement habitats provide a clear and permanent net gain for the target species.
- D. Timing and availability of habitat – operational at the time it is required. Essentially, 'in time' to offset the adverse effects which are being addressed, with evidence to show it is functioning and readily available to SPA birds prior to any loss or damage to the original site.
- E. Geographic location – for ecological reasons of structure and function it is considered appropriate for the off-setting habitat to be provided as close to the original site as practicable. The solution should also be capable of being:
- F. Validated in respect of achieving its ecological function / purpose; and
- G. Monitored for effectiveness; and
- H. Adapted to adjust to unfolding circumstances in future management; and
- I. Resilient in the face of predictable future pressures such as natural population fluctuations and climate change

In terms of the loss of Secondary Support Areas, the SWBGS indicates that Secondary Support Areas will similarly need to be offset by the provision of suitable replacement habitats which are supported by an agreed costed habitat management plan and funding secured in perpetuity.

The submitted information in respect of the Functionally Linked Land and impacts on SWBGS is extremely limited. Whilst it is noted that the submitted Ecological Summary indicates a decline in the use of the site, there is an absence of information to demonstrate how impacts to Special Protection Area supporting habitat will be impacted and any impacts mitigated/compensated. This will need to be the subject of detailed discussions with the Council's Ecologist and Natural England.

In addition to the points above, the Council's ecologist also highlights that any submission will need to be supported by updated ecological surveys. Some reports are now c.5-years old and given changes to the site in the past few years, it may have become more suitable for species such as reptiles. A full copy of our ecologists response is provided.

In the absence of any information regarding the location of the replacement site, it is not possible to conclude whether the application proposal would secure an appropriate replacement mitigation site. As such, it would not be possible to rule out a likely significant effect and there would be no presumption in favour of sustainable development in accordance with paragraph 182 of the NPPF.

Separate to the points above, it has been identified that that population increases through new housebuilding will impact on the bird populations of the SPAs through increased recreational disturbance and increased nutrients within the Solent Water Environment. As a result, mitigation measures are needed in order to continue granting planning permission for residential development in the Borough.

Further details of the Solent Recreation Mitigation Strategy to mitigate the impacts of recreational disturbance can be found [here](#).

In respect of nutrient neutrality, Natural England has recently updated their advice and guidance for calculating and addressing nutrient neutrality within new developments. It constitutes the most up-to-date scientific information regarding water quality and so must be taken into account in preparing Habitats Regulations Assessments on planning applications. Further details can be found [here](#).

Through its Position Statement and Mitigation Plan, the Council has identified how the impacts of development can be mitigated. The Position Statement sets out details of the Council's own mitigation scheme at Warblington Farm which would be a suitable option for smaller developments within the Borough. The LPA highlight that capacity at Warblington Farm is limited and the Council is no longer able to offer 'credits' for larger scale developments. I would therefore, advise that alternative forms of mitigation to ensure nutrient neutrality will need to be sought.

Heritage

As set out above, a further key consideration is the presence of the Scheduled Monuments which are either within or in close proximity to Campdown, and in particular how their settings are appropriately addressed. The pre-application pack does not include a Settings Study in response to the Inspectors' Interim Findings.

The revised layout does not fully enclose the Roman Villa Scheduled Monument or overlie the roman road, instead providing a larger area of open space to the north of the site. This is a step in the right direction allowing a greater appreciation of the heritage assets. However, the precise position of built form to the south and the specific design of the first dwellings does not appear to have been informed by a detailed Heritage Statement or Setting Study which was highlighted as a requirement within the Inspectors' Interim Findings to establish how much land would need to be left undeveloped to fully address the settings of these heritage assets.

The Council's Conservation Officer has recently provided detailed feedback to the landowner on a Preliminary Settings Assessment prepared by RPS Group. Therefore, clarification is requested in terms of whether there has been any assessment on how much open land

should be retained around the heritage assets in order to protect their identified significance/setting. The Assessment and resultant layout/design will need to be subject to consultation with the Council's Conservation and Archaeological Officers, and Historic England to ensure that it meets their requirements. This assessment will clearly have a bearing on the quantum of development that is achievable at the site and will have significant implications on design and layout.

In the absence of an appropriate Setting Study and Heritage Statement justifying the proposed layout and demonstrating an appropriate relationship with the heritage assets, the LPA is unable to conclude whether the proposal would adequately protect the setting of the heritage assets.

Trees

Whilst Arboricultural comments have not yet been provided as part of this enquiry, I would refer you to comments made by the Council's Arboricultural Officer, the Forestry Commission and the Woodland Trust particularly in respect of veteran trees at the site following guidance set out in the NPPF. This related to H81 and G78 identified by the Arboricultural Survey submitted as part of APP/19/01101. It appears that the current proposal would result in the same impacts.

The absence of development to the northern part of the site principally to address heritage impacts will also remove development close to the ancient woodland to the north. Whilst this is likely to remove any direct impacts on the woodland, consideration should be given to potential indirect impacts resulting from an increased population and activity at the site.

Highways

Hampshire County Council as Local Highways Authority highlight that it operates a chargeable pre-application highway advice service for developers and has not provided detailed comments on the proposal as part of this enquiry. A full copy of their response including details of their service has been provided. If a submission to the LHA has not already been made, the LPA would recommend that this happens at the earliest opportunity and would welcome the opportunity to be party to any discussions. In the absence of specific comments in respect of this submission, I would refer you back to the LHA comments made in respect of planning application APP/19/01101 which are available for review online.

National Highways (NH) have responded due to their interest in the A3(M) and A27, particularly the A3(M) junction on Purbrook Way which is the closest strategic road network junction to the site. NH highlight that they currently have a holding recommendation in respect of APP/19/01101. In their response of 10th January 2020 NH raised several concerns and requests for additional information relating to the modelling including:

- Modelled geometries should be reviewed.
- The modelled demand, particularly the HGV percentage, should be reviewed.
- Full geometry drawings should be provided in PDF and CAD format.
- A review of observed queues compared to modelled queues should be included.

It is highlighted that any Transport Assessment (TA) will need to include all of items above and will need to review trip rates, although this is likely to be lower given the reduction in dwellings proposed. Full details of NH response including comments on the TA format and contact details for a recommended pre-submission meeting have been provided separately.

I understand conversations are also taking place with Portsmouth City Council as Local Highways Authority for the road network within Portsmouth. A combined conversation with Hampshire Highways is recommended.

Public Protection

Comments have yet to be received from the Council's Environmental Health Team. From conversations with colleagues, I understand this is in hand and I will pass comments on once received.

In the meantime, I would refer to comments previously provided on 10 January 2020 made in respect of planning application APP/19/01101 in relation to ground conditions, land contamination and air quality. There do not appear to be any comments in respect of amenity and nuisance held against APP/19/01101, although potential impacts from traffic noise on the A3(M) will certainly need to be considered and addressed.

Drainage

Hampshire County Council as Lead Local Flood Authority (LLFA) highlight that it operates a chargeable pre-application advice service for developers and has not provided detailed comments on the proposal as part of this enquiry. A full copy of their response including details of their service has been provided. Whilst not commenting on this specific proposal, I would refer you to comments made previously by the LLFA in respect of planning application APP/19/01101 and the request for further information.

Southern Water responded to planning application APP/19/01101 highlighting the presence of a public foul sewer running across the site. While there may be an intention to divert this sewer, this feature is not shown on the submitted constraints plan and so is raised again for clarity. Information in respect of SUDS was also provided and is available to view online.

It is noted that objections raised by the Environment Agency and Portsmouth Water were removed following the submission of additional drainage information. Given the passage of time this information will need to be reviewed, updated as necessary and resubmitted with any future planning application.

Standing objections

In addition to the points raised above, it is noted that standing objections in respect of planning application APP/19/01101 were also received from the RSPB, Chichester Harbour Conservancy, Natural England, Hampshire & Isle of Wight, Wildfowl & Wetlands Trust and the local Tree Wardens. These specific comments which are available to view online should be considered as part of any revised proposal.

Specific Clarification Questions:

1. Please clarify the approach to open space provision? The standards within the Housing Delivery Position Statement (HDPS) are reduced compared with those set out in the Open Space Strategy 2018;

The difference between the open space standards in the HDPS and the Open Space Strategy 2018 is noted. However, as highlighted in the consultation response from the Landscape Team, the Council generally seeks new open space provision in accordance with Policy CS1 of the Core Strategy, in line with the Fields in Trust Guidance. Table 4.2 of the Open Space Strategy reflects this, and identifies the relevant Fields in Trust standard for various open space types. It should be noted however, that the latter does not fully reflect the requirements of the Fields in Trust Guidance (Tables 1 and 3) which also encompasses formal and informal outdoor provision as set out in the Council's Landscape consultation response.

Whilst the anticipated increase in population would be 1,567 based on 653 dwellings (2.4

persons per dwelling), the amount of open space required should not be prejudged in the absence of a heritage Setting Study. This assessment will inform the quantum of space required around the Scheduled Monuments in order to respect their setting, and the net developable area of the site. This is significant given the open space standards are based on a requirement per 1,000 population and the overall population at the site will not be known until there is a greater certainty in relation to the quantum of development that could be delivered.

As an aside, given the Scheduled Monuments should significantly influence the proposed form and layout of any development, it is envisaged that development would include more than average amounts of open space. Whilst the Council's starting point is for development to provide for a minimum of 40 dwellings per hectare and for development to maximise the use of the site in a full and sustainable manner, it is acknowledged that there may be site specific constraints which merit a different approach having regard to the site's context. In this case, clearly the Scheduled Monuments and their settings will be a key consideration, and it is expected that there may be a need to include additional landscape buffers and open space pending the conclusions of the Setting Study accordingly. Other site constraints set out below will also determine the net deliverable area.

2. Please confirm officers will apply flexibility to the requirement in the HDPS for 35% provision of 2 bed houses? It does refer to 'unless local need indicates otherwise', but should this also include sites on the edge of settlements where lower density family housing may be appropriate?

The starting point will be that 35% of the overall housing mix should be 2-bedroom houses, applied equally across the Borough. As you say, there is an element of flexibility with the inclusion of reference to 'unless locally identified need evidence indicates an alternative approach should be taken', and any planning application will need to provide evidenced justification for the proposed mix.

I would also highlight that whilst the application site is situated towards the edge of the Borough, it is not necessary regarded as an edge of settlement site in the same way as sites that border East Hampshire and Chichester would be, and local need would vary as a result.

3. Please advise approach to 'community facility with indoor sports provision' as referred to in withdrawn Local Plan allocation? Not referred to in HDPS;

As it stands, there is still a requirement for a community building as part of the development and a review of what this should comprise is currently taking place both as part of this proposal and any future allocation. Conversations are on-going with Policy colleagues and those within the Council's Community Services Teams. The LPA will feed back on this in due course. Notwithstanding, and as highlighted within previous engagement on this site, the location of any community centre should be informed by its proposed use and potential future users, with a location closer to the site entrance likely to be considered most appropriate to avoid additional vehicular movements through the development. This should also have regard to the comments already offered in respect of the heritage Setting Study.

Hampshire County Council's Children's Services Team highlight that the proposal is likely to generate a need for 60 full day care places which cannot be accommodated within existing local facilities. This could also form part of a community centre provision, although it is highlighted by the Children's Services Team that this would be a full day care requirement and as such, could not form an ancillary function of a community centre and would need to operate in addition to. Whilst this could occupy a separate site, there may be some merit in shared parking facilities etc. Further discussions are advised with Kathy Murphy (Child Development & Business Officer) Kathy.murphy@hants.gov.uk or 01962 847070.

4. Are you content with the general form of the layout and design principles; location of various uses and the play areas; and landscape distribution and proposed variation in character;

Having reviewed the proposals in detail in combination with consultation responses, I consider it premature to offer any detailed comments on design and layout at this stage. It is the view of the LPA that there has been insufficient work undertaken to fully understand the site constraints, principally in respect of ecology and heritage, and any detailed work in respect of layout and design should not progress until potential constraints/impacts are known and fully understood.

Whilst a constraints plan relating to the more typical constraints of trees, topography, utilities, routes etc. has been provided, the starting point should be to fully understand the developable area of the site. This will be informed by: the outcome of a detailed setting study and heritage statement; detailed ecological work to establish in the first instance whether the function of the site is capable of being adequately replaced elsewhere given Natural England and the Inspectors' concerns, and what mitigation land may be required on-site; potential noise impacts from the A3(M) and the need for attenuation/landscaping buffers along the eastern side of the site; discussions with the LHA regarding site access arrangements; and confirmation of the preferred location, type and scale of the required community centre.

Notwithstanding this view, in the interests of providing some constructive feedback, the LPA would offer the following brief observations on design. Further observations are set out within consultation responses:

- The principle of 'character areas' is an acceptable approach but needs to ensure a balance is struck between the distinctiveness of each area and providing a more consistent sense of place across the wider development. The location of the 'character areas' should be informed by the site constraints as previously highlighted.
- Overall design quality appears to be of a high standard which is to be expected for this site. A more contemporary design approach will place a greater emphasis on ensuring that the finer details, materials and execution are of the highest standard.
- The LPA would question the appropriateness of the design approach, scale of dwellings and materials proposed for the 'Roman Road Quarter'. Again, this should be informed by the Setting Study and a Heritage Study/Statement.
- Reference is made to north/south views through the development between the Scheduled Monuments. Whilst an interesting idea which may not be fully appreciated within 2D drawings, this approach appears to have been lost a little within the proposed layout.
- As set out within design guidance, dwellings should be orientated to make the most of opportunities for solar gain, the inclusion of solar PV and to ensure adequate light and outlook to internal and external spaces.
- Whilst the development plan and the HDPS set out requirements for sustainable design and construction, delivery of development above standards required by planning policy and Building Regulations would be welcomed.
- Whilst there do appear to be some good opportunities to move through the development on foot/bicycle, some of the road links to southern areas do appear to be rather tortuous and could result in highway safety/manoeuvrability concerns. This should be discussed with the LHA once the developable area has been confirmed.
- Some locations suggest that on curtilage parking will be a dominant feature of streetscenes. Parking courts should be softened by landscaping.
- The principle of siting flats to the east of the site may be an appropriate solution to address potential impacts of noise. However, the internal layout of these dwellings will need to ensure adequate living standards can be achieved, including access to private

external amenity space. However, as the flatted blocks would be taller and bulkier, the LPA would need to understand how these would relate to neighbouring properties, and how they would appear from outside of the site given the significant changes in levels.

- The Landscape Team has provided some more detailed observations on layout and open spaces.
- The Communities Team have highlighted that the proposed allotments are sited too close to the motorway and an alternative location should be considered. An understanding of whether the allotments would be offered up to the Council or retained and managed through a management company is required. Given the number of flats without garden space, the availability of allotments to the occupiers of these properties would be positive.

5. Architectural character areas- what are your thoughts in terms of:

- Division of character areas;
- Proposed details and variation of character
- Proposed heights distribution
- Integration of parking in general

As set out above, the LPA does not intend to offer detailed design advice at this stage. Reference should be made to the National Design Guide, the Borough's Design Guide SPD, the Parking SPD and comments already offered by the Landscape Team and elsewhere within this response. The LPA would be happy to offer further advice once the developable area has been agreed and work on detailed design commences.

6. Approach to the site's levels and interaction with the landscape setting

Notwithstanding the points raised above, the LPA would agree with the approach of working with existing ground levels to minimise retaining walls and earthworks, and ensure roads and footpaths can be delivered to an adoptable standard. It is noted that an image from a 3D model of the development is included within the DAS which does appear to show some fairly significant changes in levels and gradients contrary to the written levels strategy, although we appreciate this may be a work in progress. Given the topography of the site, height of some buildings and views into and out of the development, access to the 3D model or a series of flythroughs and accurate AVRs from agreed locations would be very useful in considering visual impact in combination with the Setting Study.

The suggested green corridor between rear gardens on the steepest part of the site to avoid retaining walls is an interesting solution from both a visual and biodiversity point of view. The LPA would need to understand how this would be delivered, accessed/access restricted and maintained.

A number of trees are to be retained around the periphery of the site, although felling is proposed within more central areas. Comments above and contained within consultations associated with APP/19/01101 address this matter. The site does offer the potential for significant tree planting and indeed this may be required in part to mitigate specific visual, noise and biodiversity impacts. The submitted information does not detail what the approach to planting around the periphery of the site would be although it is apparent that a number of new trees are indicated throughout which is positive.

As set out within the NPPF new streets should be tree lined and appropriate measures should be put in place to secure the long term maintenance of newly planted trees. Trees should be located within the public domain and not in curtilage where there may be pressure from future residents to remove them, and should be of a sufficient scale so as to make a contribution to the streetscene from the day of planting. This should be considered from the outset as part of the early layout work in consultation with your highways engineers to ensure that the right trees are planted within the correct locations with infrastructure designed to remove potential future conflict.

7. Does the adjacent 'live' application for the redevelopment of the car park at South Downs College have any implications for future proposals on this site?

A number of consultee responses to this and previous proposals relate to connectivity between the two sites, although it is recognised that there are difficulties in achieving this. In addition, as a result of the changes in levels and the dense vegetation between the two sites which provides an ecological and heritage function, both sites are relatively isolated and not reliant on each other. That said, where there are opportunities to improve connectivity between the two sites and surrounding communities/uses there will be an expectation that these are pursued. Consideration should also be given to the creation of a sense place, although it is again recognised that the visual aspects of the college site will be restricted by the existing boundary treatments.

You will note from LHA comments in respect of planning application APP/22/00439 (South Downs College) that there are a number of outstanding highways matters to resolve. Of particular reference will be bicycle connections northwards and the proposed junction arrangements at the site access opposite Apollo Drive. The LHA has requested that alternative junction arrangements should be considered which could have a bearing on the type and location of the access to Campdown. Dialogue with the LHA will be essential to establish how the two accesses from College Road can be accommodated if the sites cannot, as suggested, be served from a single access point.

You will also note that similar concerns in respect of ecology and heritage impacts have been raised as part of planning application APP/22/00439 with consultee comments available to view online.

Public Engagement

I note that an online public consultation event took place earlier in the summer, although I am unsure of what the level of interest/feedback was from local residents and Members of the Council. Following a break as a result of the pandemic, the Council is again hosting Development Consultation Forums (DCF) for significant developments with the aim of improving Councillor, stakeholder and public involvement in the pre application process and provides developers with a greater understanding of the community's expectations prior to finalising a design and submitting a formal planning application.

Should you wish to attend a DCF, the cost would be £3,000 and further details including the most recent event in respect of a proposal at Palk Road can be found on the Council's website.

Final comments

As discussed at our initial meeting, there are a number of outstanding matters preventing the LPA from providing a comprehensive response to the development proposal as presented. However, given the scale of development proposed, the LPA would welcome an iterative approach to discussions in order to address the points raised within this response and as further information becomes available.

Please note that the above comments are the opinion of individual Planning Officers and are in no way binding upon the Council when determining any future applications for planning permission and nor will they prejudice the outcome of any applications submitted.

This advice also only relates to planning matters, and does not relate to any other application that may be required under Building Regulations or under any other Act, Regulation, Byelaw or Order where the Council's approval may be needed. For further guidance as to the need for consent under the Building Regulations please phone 02392 446571.

Yours sincerely

Gary Christie

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