

Planning, Heritage, Design & Access Statement

3 London Road, Purbrook, Havant, PO7 5LQ.

***Proposed change of use to vehicle
washing facility (sui generis).***



(Source: Google Maps)

Prepared by
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on behalf of Mr T. Ferati.

Introduction

This statement supports the full planning application for use of land at 3 London Road as a vehicle washing facility.

This statement explains the nature and extent of the proposal and how it responds to the local environment, in its built and socio-economic contexts. It has regard to key national and local planning policies relating to new commercial operations and design and should be read in conjunction with the other supporting documents.

Context

This rectangular vacant, previously-developed 'brownfield' site of **0.074 hectare** lies to the west of London Road, within Purbrook local centre and Havant Borough Council's administrative area.



The approach to the site from the south, along London Road.



The approach to the site from the north, along London Road.

Regardless of whether one approaches from the northeast or southwest on London Road, public views of the application site are blocked by frontage vegetation and the premises that face southeast towards to that road. Public views into the site from Marrels Wood Gardens (to the west) are blocked by timber boundary fencing (1.8 metres in height) and tall vegetation, which forms a sylvan backdrop to impressions from the southeast, on London Road. The site is contained on its southeast, northeast and southwest boundaries by dark-green palisade fences, 2.4 metres in height.

Vehicular and pedestrian access to the site is afforded via a gated entrance near its northeast corner. A dropped kerb and surfaced forecourt (finished in scalplings) afford access and parking for many vehicles on the site. Clear views to the northeast and southwest along London Road ensure that vehicles entering and leaving the site enjoy good visibility and are themselves seen clearly by approaching drivers, riders and pedestrians. In their 'Transport Statement' of February 2020 (copy enclosed), Bright Plan Ltd transport planning and civil engineering consultants, recorded that an assessment of Personal Injury Accidents (PIAs) '*...revealed 6 slight incidents in the study area.*', 'A cluster of 4



The site, viewed from the southwest in Marrels Wood Gardens.

incidents is located at the A3 London Road / Ladybridge Road / Marrels Wood Gardens Mini Roundabout.’, but notably *‘Neither of the recorded incidents on the A3 London Road in the vicinity of the site are not related to the use of the site access.’*

Employees in this locality enjoy safe and convenient access to the ‘Co-operative Food’ supermarket (just 3 minutes walk away to the north) for the purchase of provisions. London Road forms part of the route followed by the regular ‘First’ no.8 bus service that take passengers south to Cosham and on to Southsea or north to Waterloo and on to Clanfield. While it is evident that employees of this locality do not need to use a private car to enjoy good access to services (ie. this is an accessible, sustainable location), the provision of secure on-site facilities for bicycle storage would promote the use of that alternative to the private car as a sustainable transport mode, as is recognised at para.102 of the ‘National Planning Policy Framework’ 2019 (‘NPPF’) re. ‘Promoting sustainable transport’.

In his ‘Written Ministerial Statement: Planning for Growth’ of March 2011, Decentralisation Minister Greg Clark confirmed that the *‘Government’s clear expectation is that the answer to development and growth should wherever possible be ‘yes’ except where this would compromise the key sustainable development principles set out in national planning policy’*. Paragraph 11 of the NPPF reiterated that principle, by generating a presumption in favour of sustainable development and the approval without delay of proposals that accord with the development plan.

Paragraph 117 of the NPPF (‘Making effective use of land’) stated that *‘Planning...decisions should promote an effective use of land in meeting the need for...other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.’* Paragraph 130 (‘Achieving well-designed places’) provided for the grant of planning permission for development of good design.

Section 38 of the ‘Planning and Compulsory Purchase Act 2004’ requires an application to be determined in accordance with the relevant policies of the development plan unless material considerations indicate otherwise; an element of flexibility is provided which enables decisions to be made which may disagree with the development plan. The development plan for Purbrook comprises the ‘Havant Borough Core Strategy’ (2011), the ‘Havant Borough Local Plan (Allocations)’ (2014) document and Supplementary Planning Documents. The Policies Map of the development plan shows this site within the urban area and Purbrook ‘Local Centre’ with no special designation; it does not fall within a Flood Zone. It is understood to be adjacent to the St John’s ‘Conservation Area’.

Core Strategy Policy CS2 (‘Employment’) assures that *‘Planning permission will be granted for development proposals that...Safeguard existing employment sites...that are fit for purpose from development proposals for non-employment uses’* and *‘Provide jobs, generate wealth or produce an economic output on existing employment sites that are not fit for current purpose’*. Core Strategy Policy CS4 (‘Town, District and Local Centres’) states that *‘Planning permission will be granted for appropriate town centre development proposals that ...Promote and enhance...’* Purbrook Local Centre and *‘...Support small and independent businesses.’* Core Strategy Policy DM10 (‘Pollution’) generates a presumption in favour of development that does not *‘...cause pollution of water, air or soil or pollution through noise, smell, smoke, fumes, gases, steam, dust, vibration, light, heat, electromagnetic radiation and other pollutants’* provided six criteria are satisfied. Core Strategy Policy CS11 (‘Protecting and Enhancing the Special Environment and Heritage of Havant Borough’) states that *‘Planning permission will be granted for development that...Protects...the borough’s statutory and nonstatutory heritage designations by appropriately managing development...adjacent to conservation areas...’* Core Strategy Policy DM14 (‘Car and Cycle Parking on Development [excluding residential]’) states that *‘Development will only be permitted where it provides parking for cars, motor cycles and cycles in accordance with the*

relevant standards...Such parking provision must be appropriately located in relation to the development and be practical for its intended use'. Havant Borough Council's 'Parking Supplementary Planning Document July 2016 (Partially updated September 2019)' is silent on the provision of parking spaces for vehicle washing facilities (which is a *sui generis* use) but Table 9 of the SPD re. 'Miscellaneous commercial developments' calls for **1 car parking space per full-time staff** to serve 'Car sales and garage forecourts Car sales' use, which appears to be the closest comparable use. Core Strategy Policy CS16 ('High Quality Design') provides for the grant of planning permission for development that is designed to a high standard, respects local context and does not cause unacceptable harm to the amenity of neighbours through smell, the loss of privacy, outlook, noise or overlooking; it is submitted that this proposal satisfies those requirements. Core Strategy Policy CS17 ('Concentration and Distribution of Development within the Urban Areas') states that '*Development will be permitted that makes the most effective use of land in the borough by granting planning permission that...Concentrates new...development within the urban areas of...Waterlooville*' and '*Prioritises development on previously developed land, including redundant...or underused land and buildings within the urban area*'. Since the land was not last used for a 'B' class employment purpose, Core Strategy Policy DM3 ('Protection of Existing Employment...Sites') is not relevant in this instance.

Allocations Policy AL1 ('Presumption in Favour of Sustainable Development') assures that '*When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF)...It will always work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area...Planning applications that accord with the policies in this local plan will be approved without delay, unless material considerations indicate otherwise*'. Allocations Policy DM20 ('Historic Assets') calls for development to conserve historic assets – as is the case here.

Attention has naturally been afforded to the Borough Council's 'St John's Conservation Area Character Appraisal' (2008) and 'Draft Management Plan for St John's Conservation Area'.

The frontage of this part of London Road is characterised by commercial premises in a variety of formats, styles, and plot sizes (see aerial photograph on cover page). This application site comprises 0.074 hectare of vacant land that has previously been used for car sales (a *sui generis* use), which ceased in September 2019. It is understood that the site operated from 8.00am-6.30pm, Monday-Sunday and afforded employment for just one person. Since the site has lain unused for over five months generated no employment throughout that period, the view is taken that a new employment-generating use should now be found. A light-coloured portacabin office [with a gross internal area (GIA) of 23.25m²] stands near the centre of the northwest boundary. The two closest dwellings (nos.1 and 6 Marrels Wood Gardens) stand **16** and **19 metres** stand up-wind to the west/northwest of the site, with an access road and a high boundary hedge between.



The application site viewed from the northeast, on London Road.

It is submitted that the use of this under-used land in a sustainable urban location as a vehicle washing facility would accord with the commercial character of its surroundings and not compromise the character of the adjacent Conservation Area nor any key sustainable development principles of national planning policy.

Consultation

No consultations have been undertaken with Officers of Havant Borough Council or neighbours.

Amount, Layout, Scale & Appearance

In light of the favourable presumption set down in the development plan, it is proposed that this vacant site be laid to tarmac, an oil interceptor installed in the southwest element of the site (with associated french drains to the north and south), the portacabin be relocated near the northern corner and the land used as a vehicle car wash (a *sui generis* use).

Respect for the amenities of nearby residents and the setting of the Conservation Area have been accorded priority in the formulation of this proposal, from concept stage. It is therefore proposed that:

1. vehicles be rinsed off and washed with a pressure washer near the London Road frontage of the site (ie **22.5 metres** to the east of no.1 Marrels Wood Gardens);
2. vehicles be washed with sponges and rinsed off with a pressure washer in the southwest sector of the site;
3. vehicles be dried off with squeegees in the northwest sector; and
4. vehicles be vacuumed (if required) near the northeast corner of the site, to the east of the relocated portacabin (ie **29 metres** to the east of no.6 Marrels Wood Gardens).

The two pressure washers would be installed in the southeast element of the repositioned cabin, with the vacuum to its rear (north).

The proposed enterprise would operate from 8.00am-6.00pm Monday-Saturday, and 9.00am-5.00pm on a Sunday or Bank Holiday. Employment for three new full-time and three part-time positions would be generated by this use. The application site is largely screened from Marrels Wood Gardens (to the west) but it is proposed that native trees in planters be positioned on the London Road frontage and along the southwest and northwest boundaries of the site, to soften the appearance of the development yet further.

The site would continue to be served by the existing access arrangement. To improve access, it is proposed that the existing entrance gates be removed. **Five** on-site car parking spaces are proposed for staff – three along the southwest boundary of the site and two before the portacabin. Secure bicycle accommodation for staff would be afforded within the portacabin. As the site enjoys unhindered access to London Road no difficulties are anticipated for emergency services. The view is taken that vehicular traffic associated with the proposed use would not cause danger or inconvenience to users of the public highway or be materially harmful to the amenities of nearby residences. In the enclosed 'Highways Statement', Bright Plan helpfully opine that *'An assessment of PIA data showed no pattern of incidents in terms of distribution, frequency or severity that would be of concern in terms of highway safety on the local road network; The site would be served from an existing vehicle crossover located to the north of the site adjoining the A3 London Road; A vehicle swept path analysis has been undertaken demonstrating the negotiation of the accesses by cars*



The access gates to the site, via London Road.

and emergency vehicles; The proposed vehicle accesses achieve visibility splays in accordance with MfS requirements based on the A3 London Road's 30mph speed limit; The site's internal circulatory carriageway has been subject to vehicle swept path analysis demonstrating appropriate operation. Bin collection would be undertaken from the A3 London Road as per adjacent businesses carry distances between properties and refuse collectors would accord with MfS design guidance; Pedestrian access would be served via a shared surface arrangement.' and although *'The proposed development would result in a net increase in vehicle trips. The net traffic impact on the local road networks capacity / operation would be negligible.'* and *'Many of the site's trips would be linked / diverted / pass-by in nature and already present on the local road network.'*

In this configuration the proposed development would make more efficient use of this vacant, sustainable site in a manner that would accord with the commercial character of its surroundings and not result in detriment to the amenities of neighbours or the setting of the Conservation Area.

Noise

In their 'Acoustic Testing Report' of 22nd March 2020 (copy enclosed), Airtight & Noisecheck Ltd helpfully recorded that *'...the proposed car wash will not cause complaints and the rating levels are equal to the current LA90 value measured at the proposed site.'*

Crime & Anti-social behaviour

No special measures are considered necessary for the prevention of crime or anti-social behaviour. A new commercial presence on the holding would naturally deter such activities.

Trees & Ecology

No trees or protected species would be harmed as a result of this proposal.

Site Waste Management

Inert waste material would be disposed of to a licensed Hampshire County Council site and any other waste will be segregated into skips and removed by licensed collectors.

Working Practice

To protect the amenities of neighbours, the operation of construction machinery on the site will be restricted to 8.00am-6.00pm Monday-Friday, 8.30am-1.00pm on a Saturday, with no working on a Sunday or Bank Holiday. All materials and plant would be kept within the curtilage of the application site.

Conclusion

It is submitted that the requirements of the development plan are *satisfied* by this proposal since it would not detract from the existing street-scene; would be in keeping with the commercial character of its surroundings; is of a high standard of design; provides safe access for cyclists and vehicular traffic; provides satisfactory car and cycle parking for staff; the health and safety of existing and future users of the site, or nearby occupiers and residents would not be at risk; national air quality standards or objectives would not be breached; the water environment would not be detrimentally affected; it would not lead to an unacceptable deterioration in the quality or potential yield of coastal, surface and ground

water resources; no external lighting is proposed; and the prospect of criminal activity and anti-social behaviour has been taken into account.

Development of this site in the manner proposed would achieve the re-use of this vacant urban land without harm to the commercial character or appearance of the locality, the setting of the Conservation Area or the amenities of neighbours. It is contended that this proposal comprises an acceptable form of development that accords with the development plan and no other material considerations suggest otherwise.

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