

Planning, Design & Access Statement

**31A North Street, Emsworth,
Havant, Hampshire PO10 7DA.**

Demolition of the existing commercial (Use Class B2) buildings and the erection of seven dwellings ie a terrace of four two-bedroomed houses, two one-bedroomed flats and a one-bedroomed coach-house.



Prepared by
Robert Tutton Town Planning Consultants Ltd
on behalf of Weaver Mabbs Engineering Ltd.

Introduction

This statement supports the full planning application to redevelop the site of 31A North Street by demolition of the existing commercial (Use Class B2) buildings and the erection of seven dwellings ie a terrace of four two-bedroomed houses, two one-bedroomed flats and a one-bedroomed coach-house.

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 dwellings and design.



The approach to the northern element of the site from North Street.

Context



The southwest element of the site, viewed from the west on North Street.

This 'L'-shaped previously-developed 'brownfield' site of 1152 sq.m (0.1152 ha) lies to the east of North Street in Emsworth, within Havant Borough Council's administrative area and close to a wide range of local services and facilities.

Regardless of whether one approaches the site from the north or south on North Street, public views towards are blocked by the properties that face west towards the Street; impressions from the west on North Street are similarly largely foiled.

The locality is characterised by a mixture commercial premises and two-storey dwellings in a variety of styles, formats and plot sizes (see aerial photograph on cover page) – to the north of the site, for example, nos.7b-11 Palmers Road are two-storey houses on 561 sq.m of land and reflect a net density of 89dph; to the east, nos.4-16 Palmers Road are two-storey houses standing on 732 sq.m of land and represent a density of 77.5dph; and, to the west of the site, nos.18/20 are a semi-detached pair of two-storey houses that stand on 167 sq.m of land and reflect a net density of 127dph..



The site is contained on its northern, eastern and western boundaries by tall commercial buildings. Vehicular and pedestrian access to the site is afforded via gated driveways at its northwest and southwest corners. Double-yellow-line waiting restrictions along the east side of North Street ensure that vehicles entering and leaving the site enjoy good visibility and are

themselves seen clearly by approaching drivers, riders and pedestrians. A surfaced forecourt area affords parking for vehicles.

Between 1972 and September 2016 these premises were occupied by Weaver Mabbs Engineering Ltd, which supplied high-quality components, fabrications and assemblies. As a 'General Industrial' use falling within Use Class B2, it would not be permitted today to be carried out within a residential area because of the prospective detriment to its amenities by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.

The premises essentially comprise a 'L'-shaped two-storey industrial building on its eastern part and a substantial two-storey office building on its western part, to the north of the site entrance. In their existing state, the premises present a poor and impoverished appearance that detracts from the quality of local life and reduces civic pride. It is submitted that demolition of these unsightly commercial buildings and the erection of seven dwellings (as a mix of flats and houses) on this under-used but highly-sustainable urban land would accord with the character of its surroundings and not compromise any key development principles of national or local planning policy.



The site viewed from the southeast, on Palmers Road.

Residents of this locality enjoy safe and convenient access to a wide range of services and facilities in Emsworth District Centre, Emsworth railway station is just three minutes walk away to the north and North Street forms part of the route followed by the 'First' no.27 bus service that is available to take passengers west to Havant town centre and then on to Rowlands Castle; furthermore, Havant Road (just two minutes walk away to the south) is part of the route followed by the regular 'Stagecoach' 700 Coastliner bus service that is available to take passengers east to Chichester town centre then on to Flansham and Felfham or west to Havant town centre and then south to Portsmouth city centre. While it is evident that residents of this locality do not need to use a private car to enjoy good access to services (ie. it is a highly 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 paragraph 102 of the 'National Planning Policy Framework' (NPPF) 2019 re. 'Promoting sustainable transport'.



The site, viewed from the northeast, on Palmers Road.

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 2019 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 59 of the NPPF (*'Delivering a sufficient supply of homes'*) recorded that *'To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed'* and paragraph 68 (*'Identifying land for homes'*) reiterated the Government's recognition that *'Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly'*. Paragraph 117 (*'Making effective use of land'*) stated that *'Planning...decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions'*, paragraph 118 recorded that *'Planning...decisions should...give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land'*. Paragraph 130 (*'Achieving well-designed places'*) provides for the grant of planning permission for development of good design that improves the character and quality of an area and paragraph 131 asserts that *'...great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.'* There can be no doubt that this proposal – to provide a mix of one- and two-bedroomed flats and houses in a highly-sustainable location and secure the removal of a non-conforming general industrial use – accords with the intentions of the NPPF.

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 Havant Borough comprises the 'Local Plan (Core Strategy)' (2011), the 'Local Plan (Allocations)' (2014) document and Supplementary Planning Documents (SPDs). The Policies Map of the 'Allocations' development plan shows this site within the Emsworth 'District Centre' where Policies CS4 and AL.3.1 apply; it does *not* fall within a Flood Zone.

Paragraph 2.11 of the 'Allocations' document records recognition that *'Town, district and local centres lie at the heart of local communities and it is therefore important to promote and protect their vitality and viability...However, the ways in which we use our centres is changing.'* Policy AL3 consequently states that *"Planning permission will be granted for development proposals that...contribute to their vitality and viability."* It will be shown that 31a North Street has not contributed to the viability of Emsworth district centre since Weaver Mabbs Engineering Ltd closed in September 2016 and the centre's vitality would be best enhanced by residential redevelopment of this previously-developed ('brownfield') site.

Paragraph 10.11 of the Core Strategy records Havant Borough Council's view that *"It is important for the economy of the borough to protect existing employment sites that are fit for purpose...Therefore redevelopment of existing employment sites for other types of economic development will be considered once it has been demonstrated through a vigorous and exhaustive marketing exercise that the site is not fit for purpose for B use employment purposes"* and paragraph 10.12 asserts that *"Other uses that are not a type of economic development, such as housing, will only be considered once all forms of economic development have been duly considered."* Paragraph 10.13 advises that *"The type and scale of marketing should be commensurate with the scale of the employment floorspace proposed to be lost...Therefore the council will require evidence that a marketing exercise has been carried out for at least 18 months for a major site and at least 12 months for other sites...A major site is defined as being over one hectare in area or containing over 1000 square metres of commercial floorspace...Evidence is required that the marketing price is realistic and that the marketing has been appropriate and genuine...A record of all the*

required marketing will need to be presented with the application proposal...The period of marketing must have ended on a date within the six months prior to the date the planning application was submitted.” These principles have been incorporated within Core Strategy Policy DM3 re ‘Protection of Existing Employment and Tourism Sites’:- *“The change of use or development of land or premises currently or last used for B use class employment purposes to non-B use class employment will only be permitted where it has been demonstrated that the land or premises are not fit for purpose and financially unviable for B use class purposes...Only if another type of economic development cannot be found which provides similar quality and quantity of employment opportunity will other uses then be considered.”* As the subject site comprises just 0.12 hectare of land (and is therefore not a ‘major’ site), the marketing exercise to test the viability of retaining its commercial use was undertaken over a 12-month period.

This proposal is supported by the “End of Campaign Marketing Report” (ECMP) prepared by Philip Holmes of Vail Williams in February this year. The ‘Scope of Instructions’ in the ECMP recorded that Vail Williams were appointed in September 2017, commenced marketing the premises in February 2018 and continued the campaign through to February 2019. The ‘Summary’ set down in Section 4 of the ECMP records Philip Holmes’ findings that *“...the property is no longer viable for a B Class Use and alternative uses outside this use should be considered...The building is in a poor state of repair...In our view a substantial amount of improvement works are required to ensure the building is fit for purpose as a commercial use...In our view an alternative use for the building that has a lesser environmental impact in terms of noise, smell and commercial vehicle movements would be preferable in this location...Therefore, in our opinion, we have satisfied the requirements of Policy DM3 and in our view, the current use is obsolete and a change of use application for the building should be considered.”*

Paragraph 8.01 of the Core Strategy acknowledges that *“The overall character of the Borough is largely urbanised...(so)...The priority for locating new development is in the existing urban areas where there are existing facilities to use and new development would have least impact on the range of highly-protected biodiversity designations”* and paragraph 8.02 reminds one that *“The South East Plan defines built up and urbanised places as the urban areas...There is a national presumption that development should be concentrated in these areas.”* Policy CS17 consequently promotes a strategy of ‘Concentration and Distribution of Development within the Urban Areas’ which states that *“Development will be permitted that makes the most effective use of land in the borough by granting planning permission that...Concentrates new housing, employment, retail, leisure and other development within the five urban areas of Havant, Leigh Park, Waterlooville, Emsworth and Hayling Island...Prioritises development on previously developed land, including redundant, derelict or underused land and buildings within the urban area.”* This application site lies within the existing urban area of Emsworth, is close to a wide range of existing facilities and is previously-developed land with redundant buildings; furthermore, a replacement B2 general industrial use of the premises (if one could even be found) could pose environmental difficulties for residential neighbours.

Two of the ‘Objectives’ that head the ‘Housing’ chapter of the Core Strategy are particularly pertinent to this proposal – (i) the call for new homes to be distributed across the five main areas of the borough (Emsworth is one of them), taking into account sustainability, suitability and land availability and (ii) the call for a mix of dwelling types, in the right places at the appropriate times. While paragraph 6.11 reminded one of *“The 60% national target for development on PDL included in PPS3”* (PDL is ‘previously developed land’), paragraph 6.13 warned that *‘...approximately 51% of development is likely to take place on PDL’* and *‘The 60% national target of development on PDL is unlikely to be met at the local level.’* When Havant Borough Council itself records recognition that it will fail to achieve the

national target by some 15%, it is evident that this opportunity to provide new housing on highly-sustainable PDL in the urban area should be welcomed.

On the matter of 'Housing Density and Type', paragraphs 6.21-6.24 of the Core Strategy record recognition that *"The density of new housing will depend on its design and appropriateness to its location...As a guide, the following minimum density thresholds have been developed using the Havant Borough Townscape, Landscape and Seascape Character Assessment and the levels of accessibility to a range of facilities...High Density - Minimum of 60 dwellings per hectare...Where the quality of design justifies it, much higher densities could be achievable...This is likely to be more appropriate in town centres or highly accessible locations...It is not intended that density requirements should be too prescriptive as it is often a difficult balance between maximising the use of the land and reflecting surrounding built character and the amenity of neighbouring residents...This is therefore best assessed through individual planning proposals through the development management process...However, it will always be important to maximise the use of PDL in accordance with PPS3...In terms of house type and size, a mix of dwelling types is sought, from one and two bedroom flats to terraces and larger detached houses."*

The 'Havant Borough Townscape, Landscape and Seascape Character Assessment' has been closely scrutinised and this extract from the 'Built Form and Development' section of LCA24 appears the most relevant to this site: *"Densely built street frontages, with frontage buildings displaying a vertical emphasis have been identified as a key characteristic of the LCA...New development should echo this urban morphology by developing the street frontage, with access to the interior of the street block, through narrow passages or covered carriageways."*

Seven dwellings are proposed to be erected on this site of 1152 sq.m (0.1152 ha), so a net residential density of 60.76 dwellings per hectare would be achieved, thereby satisfying the 'High Density' ambition for this accessible location, whilst respecting the two-storey character of the surroundings and the amenity of neighbours. Furthermore, a combination of dwelling types (four houses, two flats and a coach-house) in a combination of one- and two-bedroomed formats is proposed, to meet the ambition of Core Strategy paragraph 6.24 to achieve *"...a mix of dwelling types...from one and two bedroom flats to terraces."*

Table 4A ('C3 Dwelling Houses – Vehicle Parking) of the Havant Borough Council 'Parking Supplementary Planning Document' (2016) calls for the provision of one parking space for each one-bedroomed flat and two parking spaces for each two-bedroomed house or flat. Eleven on-site parking spaces are required and eleven on-site spaces are proposed – six on the forecourt of Plots 1-4, three beneath the coach-house at Plot 5 and two in the site's southwest corner.

In March 2015, the Department for Communities and Local Government published its "Technical housing standards – nationally described space standard". Table 1 of the document sets down 'Minimum gross internal floor areas and storage (m²)' and three parts of the table relate to this proposal:- (i) the two-bedroomed, three-person houses proposed for Plots 1-4 should have an internal floor area of at least 70 sq.m but they actually have 75 sq.m.; the one-bedroomed, one-person coach-house on Plot 5 should have 39 sq.m but it actually has 47.8 sq.m.; and each of the flats (Plots 6 and 7) has the internal floor area of 50 sq.m that is required for a one-bedroomed dwelling that is intended to serve two persons.

Although Core Strategy Policy CS9 ('Housing') called in 2011 for the provision of on-site affordable housing *'...equivalent to on average 30-40% on smaller housing developments between 5 and 14 dwellings (gross)'*, paragraph 63 of the NPPF (2019) has asserted that the *'Provision of affordable housing should not be sought for residential developments that are not major developments'*; as 'major development' comprises ten dwellings or more and just

seven are proposed by this scheme, it is submitted that affordable housing is not required in this case.

Contamination

In July 2018, RSK undertook a 'Preliminary Risk Assessment' of the site and concluded that the site lies within an area of moderate UXO risk; that there are moderate/low estimations of contaminant linkages; and the main area of concern is the potential for chronic levels of contamination within Made Ground underlying the site. RSK considered the potential for ground gas production to be low but there is moderate/low potential for lateral migration onto the site from the nearby Gas Works.

Energy

This proposal incorporates several environment-friendly features to achieve at least a Code-level 4 rating for Sustainable Homes (or the contemporary equivalent):

- The orientation of the dwellings would maximise passive solar gain and the levels of day- and sun-light reaching habitable rooms.
- Considered openings will animate internal spaces with ample natural daylight, reducing the demand for artificial lighting.
- High-efficiency condensing boiler would heat the new dwellings.
- Low-energy fittings will be utilised throughout.
- Permeable surfaces will be laid throughout, to allow percolation through external surfaces to subsoil levels and minimise surface-water discharge.
- Locally-sourced materials will be used.
- A 'heavyweight' construction would produce a building with a high thermal mass and stable internal environments; the building fabric would be 'long-life' and allow flexible use.

Access and parking.

Since the driveway already serves a substantial B2 General Industrial holding, the view is taken that vehicular and pedestrian traffic associated with the proposed dwellings would not cause danger or inconvenience to users of the public highway or be materially harmful to the amenities of neighbouring residents.

The site would continue to be served by the existing arrangements, via North Street and Palmers Road. As the site would continue to enjoy unhindered access to those public highways, no difficulties are anticipated with emergency services reaching the dwellings or their gardens but sprinkler systems could be fitted, if require, to minimise the risk of fire. Compliance with Havant Borough Council's Parking SPD would be achieved by the provision of one on-site parking space for the coach-house and each one-bedroomed flat and two spaces for each two-bedroomed house ie eleven spaces in all.

Noise

While there would be negligible increase in the likely daytime noise levels from the proposed development and there *may* be occasional vehicles at night, such vehicle movements are unlikely to cause disturbance in neighbours bedrooms with windows open or closed. The view is held that there would be no significant loss of amenity derived from noise.

Ecology

In September 2018, EcoSupport Ltd prepared an 'Extended Phase I Habitat Survey' for this site. The 'Conclusion' reads that 'The Survey identified the potential for this site to support nesting birds within Building 2' (the two-storey building along the site's eastern boundary) and 'In addition, a number of designated sites of nature conservation interest were identified within 2km of the site.' Measures are detailed within the report, to ensure that the proposals fully comply with wildlife legislation and enhancements have been included, to increase the site's potential to support biodiversity.

Site Waste Management

Top-soil 'scraped-off' following the setting-out of the site is to be retained on the site, for re-use in soft landscaping. Where possible brick, block and concrete will be crushed and retained on-site for reuse as hardcore and timber will be salvaged where possible. 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 Saturday, with no working on a Sunday or Bank Holiday. All materials and plant would be kept within the curtilage of the application site and are to have protective fencing around.

Contributions

The applicant recognises that it is Havant Borough Council's customary practice, whenever new residential development is proposed, to seek a contribution of £337 for each one-bedroomed dwelling and £487 for each two-bedroomed dwelling, towards the Solent Recreation Mitigation Project (SRMP) and would clarification of the facilities on which the monies from this proposal would be expended, to pave the way for the requisite agreement to be entered.

Community Infrastructure Levy

It is understood that Havant Borough Council would apply a Community Infrastructure Levy (CIL) of **£80/m²** + indexation for the net increase in internal floor area brought about by this development.

Conclusion

The application site comprises 0.1152 hectare of land that lies within the urban area of Emsworth, close to a wide range of services and facilities ie it is a sustainable site for new residential development. Dwellings about the site are primarily two storeys in height and a range of densities is presented.

The site enjoys historic B2 General Industrial use rights (a class of development that is incompatible with residential neighbours) and, in their existing state, the buildings on the site detract from the quality of local life and reduce civic pride.

Central Government lays emphasis, via the NPPF, on the use of previously developed 'brownfield' land for the promotion of residential development. Havant Borough Council accepts that the national target – 60% of development on previously developed land – is unlikely to be achieved at the local level, so this rare opportunity should be welcomed.

The Core Strategy calls for an employment site like this (it is not a 'major' site) to be marketed for at least a year before permission is granted for its residential redevelopment. Vail Williams undertook the required marketing campaign between February 2018 and February 2019 and concluded that *"...the current use is obsolete and a change of use application for the building should be considered."*

The submitted scheme would deliver the target of 60 dwellings per hectare and the provision of a mix of one- and two-bedroomed dwellings, to DCLG internal space standards and satisfy Havant Borough Council's requirements for on-site car parking provision.

Redevelopment of this holding in the manner proposed would achieve more efficient use of this highly-sustainable site, whilst enhancing the character or appearance of the locality and the amenities of neighbours; further, it would provide the mix of dwelling types that would broaden the choice of housing accommodation in the southeast sector of Havant Borough. 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.

Niall Tutton BSc (Hons), MA
Robert Tutton Town Planning Consultants Ltd
22 August 2019