



Land Adjacent to 93 Winterslow Drive, Havant PO9 5DZ

Appeal Statement

On behalf of
Mr. G. Comley

December 2019



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Introduction

- 1.1. Nova Planning Limited has been appointed by Mr. G. Comley, to prepare and submit an appeal that responds to the decision of the Havant Borough Council (hereafter referred to as HBC) under Ref. APP/19/00883 to refuse planning permission for development as follows at 93 Winterslow Drive, Havant.

‘Erection of 2No. 2 bed dwelling houses with associated parking’

Site Description

- 1.2. The site is situated within a residential estate, on the northern edge of Havant/Leigh Park and within the defined urban area. Its proximity to existing services in the urban area (inc. high frequency public transport connections) make it a highly sustainable location. The estate was constructed in the late 1950s and provided as Council housing as part of a wider rehousing programme for those displaced from urban Portsmouth during the Second World War.
- 1.3. As noted in the Officer’s Report, the site (inclusive of 93 Winterslow Drive) comprises a large plot which measures approximately 20m in width by 30m in depth. It is dominated by overgrown vegetation and as such it does not contribute positively to the character of the area. The site is adjacent to Bondfields Plain, a large area of open space.

Development Proposal

- 1.5 The appeal relates to a revised proposal that seeks to address concerns in respect of the previous proposals set out later in the statement under ‘Planning History’. It comprises the erection of 2no. two bedroom dwellings together with associated access, parking and landscaping. The proposal represents a continuation of the existing pattern of development on Winterslow Drive, with two dwellings introduced to the northwest of No.93 as an extension of an existing terrace. The proposal also represents a continuation of the form, scale, bulk and massing of the existing terrace.

- 1.6 Access would be provided from an existing driveway serving an informal parking space in the frontage of No.93. This frontage area and additional land which is currently overgrown with vegetation would provide a parking and turning area for the proposed dwellings.
- 1.7 The material differences between the previously refused scheme (APP/19/00635) and the current application are 1) it represents a continuation of the existing terrace with development confined to a more modest footprint with an associated reduction in massing; 2) the layout sees built form set further back into the appeal site to provide a more generous frontage area. This allows for improved car parking and turning together with opportunities for additional soft landscaping – this arrangement also follows the advice of the Highway Authority in their consultation response for a previous proposal (under Ref. APP/19/00635).

Information submitted with the Planning Application

- 1.4. The documentation upon which the refusal of Ref. APP/19/00883 is based include:

- Application Forms and Certificates
- CIL Forms
- Drawings:
 - Location & Block Plan Drawing Ref. 101
 - Existing Site Plan Drawing Ref. 102
 - Proposed Site Plan Drawing Ref. 110
 - Proposed Ground Floor Drawing Plan Ref. 410
 - Proposed Loft Floor Plan Drawing Ref. 412
 - Proposed Roof Plan Drawing Ref. 413
 - Proposed Elevations Drawing Ref. 510
 - Existing and Proposed Streetscenes Drawing Ref. 511
 - Proposed Store Elevations Drawing Ref. 512
- Design and Access Statement prepared by Critchley Architecture and Design Ltd (September 2019)
- Petworth Multi Stock Brick Data Sheet
- Preliminary Ecology Appraisal prepared by Peach Ecology (September 2019)

Consultation Responses

1.5. The following section provides a summary of consultation responses to the planning application:

- **Hampshire Highways** - You will be aware of my response to another application for the same development on this site sent earlier this year. From the highway point of view this scheme is better than the last in that it has enough space to conveniently turn vehicle within the curtilage of the site. I note the previous application was refused permission without a highway related reason. I therefore confirm the Highway Authority have no objection to this proposal.
- **Conservation Officer, Development Control** - No Objection
- **Crime Prevention - Minor Apps** - No response
- **Waste Services** - No objection
- **Natural England Government Team** - Natural England agrees with the conclusion of your Appropriate Assessment in that the proposal has not fully mitigated its impacts on the European Designated Sites. In the absence of mitigation being secured in line with the Solent Recreation Mitigation Strategy and the Position Statement on Nutrient Neutral Development, we advise your authority that there remains an adverse effect on the integrity of the European Sites and any permission would therefore be contrary to the Habitats Regulations (2017 as amended).
- **Building Control, Havant Borough Council** - Building Regulation consent will be required for this work. Compliance with Approved Document B section 5 Fire Authority access to be complied with show compliance with 45m rule. Front entrance door opens within 400mm of stair and therefore fails to comply with Approved Document K requirements. Solid waste storage to be brought to front of house on days of collection. If loft area is to be habitable protected staircase will be needed including fire doors to habitable rooms off staircase. Compliance with Approved Document E will be needed for bedroom 1 Party wall on 93B

The Reasons for Refusal

1.6. The planning application was refused on 16 November 2019 for the following three reasons:

- 1) *The proposal would constitute an undesirable over-intensive use of the site. The proposed car parking would dominate the frontage of the properties and as such the development would result in a cramped and contrived layout which would have an adverse effect on the amenities of the area and the living conditions of the occupants/owners of the existing and proposed dwellings. The proposal therefore conflicts with policy CS16 of the Havant Borough Local Plan (Core Strategy) 2011, the Havant Borough Design Guide Supplementary Planning Document 2011 and the National Planning Policy Framework.***
- 2) *In the absence of a suitable agreement to secure appropriate mitigation measures, the development would be likely to have a significant effect on the Solent Special Protection Areas due to the increase in recreation as a result of the development, and so is contrary to Policies CS11 and CS21 of the Havant Borough Local Plan (Core Strategy) 2011, Policy DM24 of the Havant Borough Local Plan (Allocations) 2014, the National Planning Policy Framework and the Conservation of Habitats and Species Regulations 2017.***
- 3) *The proposal, in the absence of an assessment of nutrient discharge and without completion of the appropriate binding arrangements in relation to offsetting any increase, is likely to have a significant effect on internationally designated ecological sites (Special Protection Areas, Special Area of Conservation and potential SPA designations). The development is therefore contrary to policies CS11 and CS21 of the Havant Borough Local Plan (Core Strategy) 2011, the National Planning Policy Framework and the Conservation of Habitats and Species Regulations 2017.***

Planning History

1.7. The planning history for the appeal site includes the following applications and appeals:

- **Ref. 06/70495/002** - Outline application for 1 No. detached dwelling. Resolved to grant consent under delegated powers. However, the Section 106 Agreement was never signed. Therefore, a letter was sent to the previous applicant stating that if no response was received within 14 days then the application would be recorded as not proceeded with. No response was received and therefore the application was left undetermined.

- **Ref. 08/70495/004** - Erection of 2 No. 3 bed detached dwellings with associated car parking and landscaping utilising existing access onto Winterslow Drive. Refused 15th November 2008. The application was refused for the following reason:

‘The proposal would constitute an undesirable over-intensive use of the site. The proposed car parking would dominate the frontage of the properties and as such the development would result in a cramped and contrived layout which would have an adverse effect on the amenities of the area. The proposal is therefore contrary to saved policies D1 and T7 of the Havant Borough District Wide Local Plan 1996-2011’.

- **Ref. 09/70495/005** - Erection of 1 No. 3 bed and 1 No. 1 bed semi-detached dwelling with associated car parking and landscaping utilising existing access onto Winterslow Drive. Refused on the 16 November 2009 for the following reason:

‘The proposal would constitute an undesirable over-intensive use of the site. The proposed car parking would dominate the frontage of the properties and as such the development would result in a cramped and contrived layout which would have an adverse effect on the amenities of the area and the living conditions of the occupants/owners of the existing and proposed dwellings. The proposal is therefore contrary to saved policies D1 and T7 of the Havant Borough District Wide Local Plan 1996-2011 which forms part of the part of the Havant Borough Local Development Framework and, PPS1 of Planning Policy Guidance and PPS3 of Planning Policy Guidance’.

A subsequent Appeal was dismissed on 18 May 2010, with the Inspector concluding that the proposal would have a significant adverse impact on the character and appearance of the area and due to the proposed parking arrangement would result in the potential to cause significant inconvenience to existing and future residents to the detriment of their living conditions.

2.0 RELEVANT PLANNING POLICIES

- 2.1 The following section sets out in full all policies referred to in the LPA's reasons for refusal and these policies will be assessed in detail in the Appellant's case for allowing the appeal. It also includes reference to Supplementary Planning Documents (SPDs) where these are relevant to the application and reasons for refusal.

The National Planning Policy Framework (Revised 2019)

- 2.2 The decision notice refers to the NPPF in general terms. When considering the merits of the appeal, Paragraph 59 is relevant. It sets out the Government's objective of *"significantly boosting the supply of homes"*.
- 2.3 Section 11 of the NPPF outlines the Government's objective of 'making more efficient use of land'. Paragraph 117 states that *"Planning policies and 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 (d) goes on to state that planning policies and decisions should *"promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively"*.
- 2.4 Section 12 of the NPPF deal with good design and achieving well designed places. Paragraph 127 outlines six key considerations in assessing whether the objective of good quality design are being met.

Havant Borough Local Plan – Core Strategy (2011)

- 2.5 The reasons for refusal refer to Local Plan - Core Strategy policies CS11, CS16 and CS21; and Local Plan - Allocations Policy DM24.
- 2.6 Policy CS11 (Protecting and Enhancing the Special Environment and Heritage of Havant Borough) focusses on landscape, townscape and ecological considerations. It seeks to direct development to less sensitive locations and to ensure proper mitigation where development proposals generate impacts independently or cumulatively.

- 2.7 Policy CS16 (High Quality Design) seeks high standards of design in new development, encompassing a range of objectives as set out within the policy. The objectives of the policy can be summarised as follows:
- Has regard to and responds positively to its context
 - Delivers good relationships
 - Contributes to improved public realm where possible
 - Provides inclusive design solutions to cater for varying needs
 - Promotes mixed use development in suitable urban contexts
 - Mitigates environmental impacts
 - Provides adaptive design approach to cater for changing needs
- 2.8 Policy CS21 (Developer Requirements) states that development proposals will only be permitted where they compensate for the increased demand placed on local infrastructure.

Havant Borough Local Plan – Allocations (2014)

- 2.9 Policy DM24 (Recreational Disturbance to Special Protected Areas (SPAs) from Residential Development) deals with development that increases recreational pressure on the Solent SPA. It requires such development to mitigate the associated impact through provision of alternative recreational space on site or by way of contributions towards the provision of alternative recreational space off site and management measures to avoid pressures on the SPA.

Havant Borough Design Guide – SPD (2011)

- 2.10 The Design Guide sets out a number of key design principles which should be considered when formulating a good design. Some aspects of the document are intended for larger scale development proposals. However, there are some aspects which are applicable to a development of this scale. These are set out at Table 4.1 of the document.

3.0 THE APPELLANT'S CASE

- 3.1 The following section puts forward the Appellant's case, including 1) specific responses to the LPA's reasons for refusal; and 2) the merits of the proposed development. This includes reference to Officer's Report which provides the LPA's assessment upon which these reasons for refusal are based.
- 3.2 Reason 2 raises issues relating to ecological mitigation, which can be dealt with through an appropriate legal agreement. This will be progressed alongside the appeal and submitted with final comments.
- 3.3 Reason 3 relates to nitrogen neutrality, which is a significant constraint across all areas with foul treatment works draining to the Solent. HBC have adopted Position Statement setting out their proposal to deal with this issue. A completed Checklist is attached at **Appendix 1**, confirming the appellant's acceptance of this condition.

The development hereby permitted shall not be occupied until:

- a) A water efficiency calculation in accordance with the Government's National Calculation Methodology for assessing water efficiency in new dwellings has been undertaken which demonstrates that no more than 110 litres of water per person per day shall be consumed within the development, and this calculation has been submitted to, and approved in writing by, the Local Planning Authority;*
- b) A mitigation package addressing the additional nutrient input arising from the development has been submitted to, and approved in writing by, the Local Planning Authority. Such mitigation package shall address all of the additional nutrient load imposed on protected European Sites by the development when fully occupied and shall allow the Local Planning Authority to ascertain on the basis of the best available scientific evidence that such additional nutrient loading will not have an adverse effect on the integrity of the protected European Sites, having regard to the conservation objectives for those sites; and*
- c) All measures forming part of that mitigation package have been provided to the Local Planning Authority.*

- 3.4 Reason 1 is the principal reason for refusal and it includes various elements, all of which relate to perceived overdevelopment and associated impacts on the character of the area and the amenity of residents, to the extent that the proposal is considered by the LPA to conflict with Policy CS16 and the Design Guide SPD.

- 3.5 The existing character of the area is key consideration in any assessment of whether the LPA's concerns, either individually or cumulatively, translate to material harm and to define the extent of this harm to inform the planning balance having regard to the material benefits of the proposal. Therefore, in the first instance we have undertaken an analysis of the character of the area where this is relevant to the reason for refusal.

The Existing Character

- 3.6 **Form and layout** - the site forms part of a wider residential estate which sees development laid out in a regimental manner, with linear patterns on the edges and central perimeter blocks. The dwellings are exclusively two storeys in height with buildings predominantly orientated parallel with the internal road network and addressing the highway behind limited frontages. The dwellings are in terraced and semi-detached form. The terraces vary in length and there are examples of longer terraces throughout the wider estate, all of which are aligned in an east-west orientation (see Figure 1 below).
- 3.7 The most positive aspect of the layout is the generous areas of public open space that provide space between the internal perimeter blocks. As is generally the case for these estates, the potential of these open areas is not maximised in terms of landscape planting.



Figure 1 – Long terraces

3.8 **Frontage treatments** - the dwellings on Winterslow Drive and within the wider estate are generally set back from the highway with frontages of circa 7.5m in depth and delineated by low level walls and fences. Where historically these frontages would have been left as garden, a large proportion have been hard landscaped under permitted development rights and in most cases to provide on-plot parking. As can be seen in Figure 2 below, the section of Winterslow Drive nearest the appeal site includes a predominance of hard surfaced frontages, to the extent that this is now an established feature of the area and forms part of its character.



Figure 2 – Extent of hard surfaced frontages

3.9 Looking at the internal treatments of the frontages as shown in Figure 2, they comprise hard surfacing that extends from the highway to the front elevations of dwellings (full depth of frontages) with parking immediately adjacent (to the front of) properties. In some cases, this includes multiple spaces as can be seen in Figure 3 below.



Figure 3 – Appearance of hard surfaced frontages on Winterslow Drive

- 3.10 Character of the appeal site from public vantage points** - The appeal site itself lies in the corner of the residential estate and sits centrally within the character area as described above. From Winterslow Drive, which is the only notable public vantage point of the site, it features overgrown vegetation set behind an area which is dominated by hardstanding and parking (see Figure 5 below). As noted in the Officer's Report under 'Site Description', "*The site remains in a poor state and there are no trees on the site*". In this context, development of an appropriate form and massing, together with a comprehensive hard and soft landscaping scheme, can only enhance the appeal site's contribution to the area.



Figure 4 – View of the Appeal Site from Winterslow Drive

The LPA's Concerns

- 3.11 To at least some degree we feel that the LPA's assessment of this proposal has been clouded by views on previous applications and appeals. Officers have failed to assess the current proposal on its individual merits. This is evidenced by the fact that Reason 1 is copied word-for-word from the 2008 and 2009 refusal despite the schemes being completely different in terms of the amount of development and its form and layout.
- 3.12 With the existing character of the appeal site and surrounding area in mind, we have assessed the individual concerns cited in Reason 1, which are considered by the LPA to result in an *“undesirable and over-intensive use of the site”*. It is important to point out that no concerns have been raised by the LPA in respect of the design, form, scale or massing of the proposed dwellings; and the extent of private amenity space provided. As such these concerns focus only on the frontage of the site and the intensity of use.

‘Car parking would dominate the frontage’

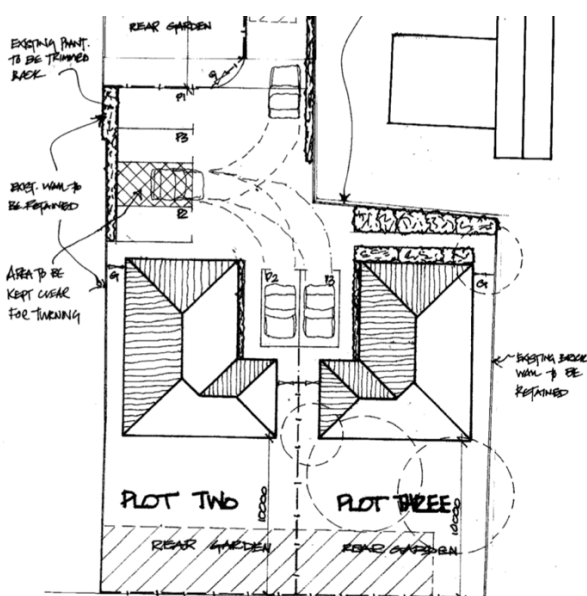
- 3.13 As a starting point, it is worth highlighting that the existing frontage area could be hard surfaced in its entirety under Part 1 Class F of the GPDO and used for car parking. It is also worth noting that there are very limited views of the appeal site from Winterslow Drive, which is the only public vantage point. This view is shown in Figure 4, which features hard surfacing and existing car parking dominating the foreground and obscuring the application site to a large extent. It is therefore difficult to understand how the proposed development would detrimentally alter the character of the area when it will not materially alter this existing view.

- 3.14 Looking at the composition of the frontage area, the character assessment above has established that car parking on frontages is an established feature of Winterslow Drive. The character assessment has also established that the balance between hard surfacing and soft landscaping in existing frontages varies but there are plenty of examples where frontages are laid to hard surfacing in their entirety. Whilst a significant portion of the frontage would be dedicated to turning and parking, this arrangement would replicate the composition of existing frontages in the area and would certainly not alter the character of the area in this regard.
- 3.15 It is also worth noting that the proposal includes areas of landscaping to soften and improve the appearance of the frontage area. The Officer's Report suggests that the provision of the landscaping in the eastern portion of the frontage area means it is further away from public vantage points. As noted above in relation to Figure 5, this view is framed by existing parking and offers only limited glimpses through the access into the frontage area. By placing the landscaping in the eastern portion of the frontage, it provides an opportunity to terminate this glimpsed view with landscape features and in doing so it seeks to enhance the sites contribution to the surrounding area.

'Cramped and contrived layout' and the associated impact on amenity

- 3.16 This reference is included as a consequence of the extent of car parking proposed in the site frontage. As set out above, the treatment of the site frontage reflects the character of the area in terms of the balance of hard surfacing and soft landscaping. Therefore, the only other relevant consideration is how the frontage functions and whether this results in any unacceptable impacts on the safety and amenity of residents. The Officer's Report suggests that the proposed arrangements will have a detrimental impact on the living conditions of existing and proposed properties as *"the proposed parking arrangement would result in manoeuvring right up the front doors of the proposed dwellings, and given the limited space result in awkward manoeuvring to access the parking area, and to leave the site"*. Parking provision and vehicle manoeuvring are matters that the Highway Authority are best placed to judge and whilst these concerns may have been justified in previous applications where the Highway Authority has objected, the reverse is true here.

- 3.17 With regard to the practicality and convenience of the proposed parking arrangements, the Highway Authority (Hampshire County Council) were consulted on the planning application and commented that *“From the highway point of view this scheme is better than the last in that it has enough space to conveniently turn vehicle within the curtilage of the site... therefore confirm the Highway Authority have no objection to this proposal”*. A copy of the consultation response is provided at **Appendix 2**. With this in mind, there is no sound basis to question the practicality or convenience of the proposed parking arrangements and equally here is certainly no basis to apply the previous reason for refusal to this proposal.
- 3.18 The second consideration is the number of parking bays and the prospect of manoeuvres to and from these bays in close proximity to the host dwellings. As a matter of clarification, the parking bays are set back from the front elevations of the proposed dwellings by 1.1m – the bays do not extend *“right to the front door”* as suggested in the Officer’s Report. The principle of having parking bays in frontages and in close proximity to the host dwellings is not new. It features throughout Winterslow Drive and elsewhere in the Borough. There are four parking bays proposed to the front of Nos. 93a and 93b as shown on the Proposed Site Plan Drawing Ref. 110. This arrangement replicates a number of similar relationships that have been approved in the Borough based on the same Development Plan policies and we have included information at **Appendix 3** to show these approved relationships. This information should be viewed alongside the following summary assessment of each case.
- **Ref. APP/19/00021** – 26 West Haye Road, Hayling Island: The approved parking arrangements shown on Drawing Ref. 19/803/01 (Rev A) include two parking bays wedged between the two proposed dwellings (creating a tunnelling effect for noise from manoeuvring vehicles) and a narrow ‘keep clear’ area for reversing vehicles to turn and leave the site in forward gear. This arrangement works but is certainly more constrained and contrived than the appeal proposal. Further parking bays are located to the north of Plot Two such that this dwelling has manoeuvres occurring alongside two elevations. Again, this is less favourable than the appeal proposal in terms of the amenity of neighbouring properties.



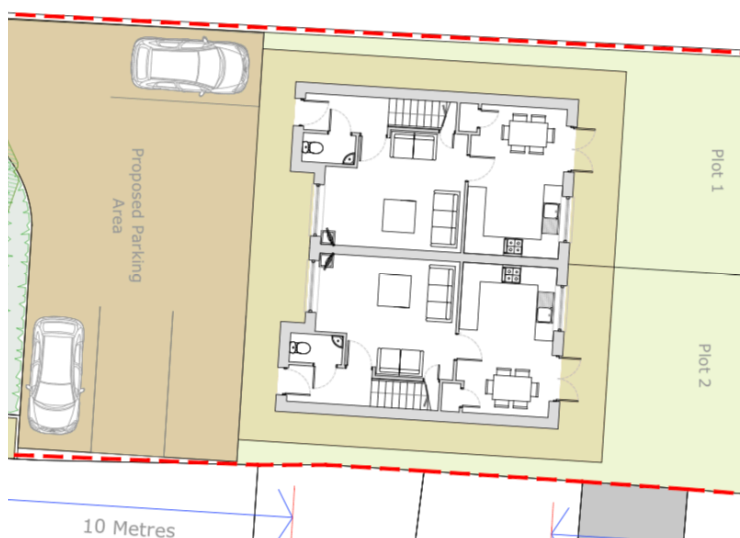
- **Ref. APP/19/00281** – Land adjacent to Woodcroft Primary School, Waterlooville: The arrangement of parking for plots 8 – 16 replicates the arrangement for the proposed development in this appeal. However, the extent of parking, particularly the concentration of parking around Plot 15, results in a far worse level of amenity than would be the case for either proposed dwelling in this case.



- **Ref. APP/16/00774** – Land North of Havant Road and West of Selangor Avenue, Emsworth: As above, the arrangement of parking for plots 129 – 131 broadly replicates the arrangement for the proposed development in this appeal. However, the extent of parking, particularly the concentration of parking around Plot 131, results in a far worse level of amenity than would be the case for either proposed dwelling.



- **APP/16/00713** – 3 Victoria Road, Emsworth: This proposal has parking at a similar distance from front elevations and with the entirety of the frontages made up of hard surfacing. This relationship is equivalent to the appeal scheme in terms of the intensity of use of proximity of vehicle manoeuvres.



3.19 The assessment above demonstrates that the parking arrangements equivalent to the proposed development have consistently been approved by the LPA. In some cases, the approved arrangements would result in a significantly worse relationship than the proposed development in this case. Therefore, the LPA's decision is considered to be unjustified and entirely inconsistent.

Assessment of the Proposal against the Design Guidance SPD

- 3.20 Alongside the character assessment above, we have also undertaken an assessment of the proposal against the various principles identified in the adopted Design Guide SPD, with specific focus on the matters for consideration in assessing character. These principles amplify the criteria contained in the Policy CS16 of the Local Plan - Core Strategy.
- 3.21 Paragraph 5.33 of the SPD deals with ‘infill development’ and states that *“Infill development should look to the immediate site context for reference and respect the layout and character of the surrounding area, looking to immediate neighbouring properties in the first instance. Where perimeter block development predominates, rear garden infill breaks the perimeter block structure and may reduce the security of internal areas and therefore may be unacceptable”*. The proposal is not seeking to infill a rear garden and as such it would not undermine a perimeter block structure. With regard to the underlined text, the preceding sections of this statement confirm that the proposal responds positively to the existing context and character.
- 3.22 Section 4.0 of the SPD contains various principles that should be considered in a robust character assessment. We have undertaken a review of the proposal against these principles as follows:

Issue	SPD Comments	The Proposed Development
Plot width	Similar to that prevailing in the local area	The LPA has not raised any concern in this respect.
Street build up	Respect the rhythm and massing of development in the area	The LPA has not raised any concern in this respect.
Building Line	Respect forward building lines where there is a recognisable pattern	The LPA has not raised any concern in this respect.

Set back and enclosure	Distance between the building line and street	The LPA has not raised any concern in this respect.
Massing	Depth and width of development to reflect existing pattern	The LPA has not raised any concern in this respect.
Height	Building height should reflect existing heights and provide transition where necessary. Boundary treatments – height and position of boundary treatments should reflect the existing pattern	The LPA has not raised any concern in this respect.
Landscape and topography	development should look to retain existing landscape features (e.g. trees) and the balance of hard and soft landscaping should not be at odds with the balance found generally within the area	There are no notable landscape features on the site at present and as referenced in the Officer's Report. As such, the introduction of a high quality hard and soft landscaping scheme will significantly enhance the landscape quality of the site and therefore its contribution to the area.
Topographic nature of the site and surroundings	Ensure that the design approach has regard to changing topography in a site.	The site is flat so this issue is not applicable.
Detail and materials	Form and rhythm of facades should reflect the existing vernacular and so too should the architectural detailing	The LPA has not raised any concern in this respect.
Density and mix	The density of development should respond to the prevailing density in the area	The massing of built form and balance between built and unbuilt space within the site compares favourably with existing development in the area. As such, the density of development is considered to be acceptable and the LPA has not raised any concern regarding density. Mix is not applicable to a development of this scale.

3.23 With regard to other metrics that would indicate an appropriate level of development, the following considerations are relevant:

- The proposed development meets the National Minimum Space Standards for development. The minimum requirement for a two bedroom two storey dwelling is 70sqm. Both proposed dwellings exceed this standard;
- The proposed development maintains sufficient distance to all site boundaries as outlined in the SPD with over 1 metre maintained to the side boundary and over 10 metres to the rear boundary;
- The provision of private amenity space in the form of generous rear gardens that are comparable in size to adjoining properties in the wider residential estate (extent of character area); and
- Parking provision of 2no. spaces per two bedroom dwelling to meet the LPA's adopted parking standards.

3.24 With all of the above considerations in mind, it is clear that the LPA's concerns as cited in Reason 1 are without justification. These concerns focus entirely on the level of use and treatment of the frontage area. However, when you consider the comments of the Highway Authority and the prevailing character of the area as outlined above then there is nothing to substantiate these concerns. In addition, the concerns completely ignore the fact that similar relationships have recently been approved by the LPA – in these other cases the scale of development would result in a more intensive use.

The Benefits of the Proposal

3.25 The site is situated within the Portsmouth Housing Market Area where there is a significant need for housing generally – Objectively Assessed Needs (OAN) of 49,500 dwellings for the period 2011 – 2036 (Partnership for Urban South Hampshire Strategic Housing Market Assessment 2016). The proposal, comprising 2no. dwellings, would make a small but not insignificant contribution to meeting this need in a highly sustainable location.

- 3.26 The LPA has undertaken a Specialist Housing Analysis (2019) to inform a housing mix policy (emerging policy H4) in the emerging Local Plan. This confirms that 34% of the open market element of the total OAN should be provided as two bedroom dwellings. The proposal would provide accommodation suitable for entry level purchasers on the open market (within 'Help to Buy' thresholds) whilst addressing the need where it is most acute according to the evidence.

Figure 1: Estimated Dwelling Requirement by Number of Bedrooms (2011 to 2036) – Market Sector

Sub Area	1 Bedroom	2 Bedrooms	3 Bedrooms	4+Bedrooms
Havant	8.9%	34.2%	45.2%	11.6%

Source: PUSH Strategic Housing Market Assessment 2014²

Overall Assessment and the 'Planning Balance'

- 3.27 In considering the planning balance in this case, the evidence above confirms that there are material benefits in allowing the appeal in terms of housing delivery and type of accommodation being provided, which should weigh in favour of the appeal.
- 3.28 Against this we feel that the LPA's concerns regarding the harm to character and amenity is both unfounded and unsubstantiated. Based on our detailed character assessment, the proposal would 'at worst' replicate the existing character of the area and therefore result in a neutral change. The arrangements would not be harmful to amenity of residents and would simply replicate similar arrangements recently approved by the LPA. In reality, we feel that the proposal would go beyond this neutral position and deliver material benefits by improving the existing appearance and condition of the appeal site as it has been described by the LPA.
- 3.29 Overall, we feel that the material benefits of the proposal site alongside a position of no substantial harm, and as such the development is sustainable in the context of the NPPF.

4.0 CONCLUSIONS

- 4.1 Planning permission is sought for the erection of 2no. two bedroom dwellings at Winterslow Drive, Havant. This proposal has sought to address the previous concerns of Officers by altering the form of development and reducing the overall amount.
- 4.2 Despite these amendments, the LPA has refused planning permission for three reasons. Two of the reasons can be dealt with by an appropriate legal agreement and planning conditions. The principal reason for refusal (Reason 3) raises concerns regarding a perceived impact on the character or the area and the amenity of residents (existing and proposed).
- 4.3 This statement includes a thorough character assessment of the site and the local area, together with an analysis of specific local policies relating to character (Design Guide SPD). This work confirms that the proposal does not have an adverse impact on the character of the site or local area. Taken with site's negative condition and appearance as acknowledged by the LPA, it delivers a material enhancement.
- 4.4 The proposal provides housing to meet the LPA's significant housing need in a highly sustainable and unconstrained location without any objections from statutory consultees. The provision of smaller two bedroom homes would provide accommodation suitable for entry level purchasers on the open market and address where this need is most acute. This is a significant benefit that should weigh in favour of granting planning permission.
- 4.5 In summary, it has been demonstrated that there would be no adverse impacts resulting from the proposed development and conversely it represents an excellent opportunity for windfall development in a sustainable location. The proposal would make efficient use of land to deliver good quality homes with good amenity space. It is in a form that is consistent with the pattern of development found locally and consistent with planning policy. In these respects, the proposal is truly sustainable and consistent with the NPPF.

Appendix 1 – Completed Checklist from HBC Position Statement on Nutrient Neutral Development

Appendix 2 – Consultation Responses from Hampshire County Council (Highways)

Appendix 3 – Information from precedent decisions from HBC