



Land West of Hulbert Road, Havant

Planning Design & Access Statement

Including Affordable Housing Statement &
Statement of Community Involvement



Prepared by the WYG Group on behalf of the
Trustees of the GHM Jackson 1972 Settlement

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1. Introduction

1.1 WYG has been instructed by the Trustees of the GHM Jackson 1972 Settlement (hereafter referred to as “The Jackson Trust” or “the applicant”) to prepare a Planning Design and Access Statement, including Affordable Housing Statement and Statement of Community Involvement, to support the submission of an outline planning application with all matters reserved except access to Havant Borough Council, for the development of up to 120 dwellings and associated improved site access, landscaping, footpaths, SuDS and other associated works on land to the west of Hulbert Road, Havant. In accordance with adopted policy, 30% of the homes will be affordable. The outline planning application comprises the following plans and documents:

- Application Form
- Ownership Certificate
- CIL Forms
- Covering Letter
- Planning Design and Access Statement including Affordable Housing Statement and Statement of Community Involvement
- Concept Masterplan
- Preliminary Tree Survey
- Transport Assessment
- Framework Travel Plan
- Flood Risk Assessment and Preliminary Drainage Strategy
- Noise Assessment
- Air Quality Assessment
- Lighting Assessment
- Ecological Reports
- Utilities Plan
- Habitat Regulations Assessment (to be submitted under separate cover)

1.2 The purpose of this statement is to set out the background to The Jackson Trust’s proposal including the site context, constraints and opportunities and the relevant planning policies. An assessment of the proposal against these policies and relevant technical considerations is provided, together with an explanation of the design concept and access arrangements.

1.3 This application is in outline, with all matters reserved apart from access.



- 1.4 Havant Borough Council is in the process of producing a new local plan to cover the period up to 2036, with a Draft Local Plan published for consultation in January 2018, followed by a Pre-Submission Plan in February 2019. Further work has since taken place and revisions made to the Pre-Submission Plan, which means that subject to Cabinet approval, a further consultation is expected. The site is not allocated for development in either the adopted or emerging local plan.



2. The Site and Surroundings

- 2.1 The site is located in Havant Borough, between Waterloooville, Bedhampton and Leigh Park. To the south are the B&Q and Asda superstores and to the north is the Dunsbury Park employment area. Directly to the west is the A3(M) motorway and to the east is Hulbert Road, which links the towns of Havant and Waterloooville.
- 2.2 The site itself comprises a clear, grassed area together with a strip of roadside verge extending both north and south, to accommodate a footpath. The total site area, including the area for a future footpath, is 7.25 hectares. The main development site excluding the area for the footpath measures approximately 5Ha. There is an existing vehicular access from Hulbert Road to the northern part of the site. Directly to the north and south are areas of woodland, including plantation woodland created in the 1960s. Slightly further afield are large areas of residential development, including Stakes, Bedhampton and Leigh Park.
- 2.3 The proximity of existing residential development, large retail and employment premises and a road network served by public transport, means that the site is sustainably located for access to a wide range of facilities. These are described in more detail at Section 7 of this statement and in the Transport Assessment and Framework Travel Plan which support this application.
- 2.4 Of particular note is the wide range of facilities centred around the recently re-configured Asda roundabout. Works at the roundabout have facilitated the introduction of new crossings, improving access for pedestrians and cyclists between Purbrook Way (leading to Leigh Park), Hulbert Road South (leading to Bedhampton) and the access roads to Asda and B&Q. A footpath along the western side of Hulbert Road is proposed, which will join directly into the existing network at the roundabout, which also includes several bus stops with services linking Leigh Park, Purbrook, Havant and Waterloooville.



3. Planning History

- 3.1 Previous planning applications relate to the construction of a new access in association with hydrocarbon exploration, as follows:

APP/08/53384/002 Temporary permission to construct a hydrocarbon exploration site; mobilization of a drilling rig; setting-up and the drilling of an exploratory well including flow testing; permission to include new highway access, access track and passing places. Planning permission granted 2 December 2008

APP/12/01061 Hampshire County Council Consultation for Variation to Condition No. 2 of Planning Permission 08/53384/002 to alter from 36 months to 60 months from the start of the development. Application withdrawn.

- 3.2 It is accepted that due to the temporary nature and use for mineral extraction of the permitted hydrocarbon exploration site that the permission does not establish the site as being 'previously developed' as defined by the NPPF. It nonetheless does establish that the site is not of high landscape value and can incorporate development successfully in landscape terms.

4. The Proposal

- 4.1 The Jackson Trust is proposing the development of up to 120 new homes, including a policy compliant level of affordable housing, on land to the West of Hulbert Road. The scheme will incorporate an improved vehicular access from Hulbert Road, in the location of the existing access. The proposal includes a new pedestrian footpath along the western side of Hulbert Road, linking to Dunsbury Park to the north and to Asda and B&Q to the south. This new footpath will connect directly to existing pedestrian, cycle, bus and rail networks, providing residents with multiple opportunities for onward, sustainable travel.
- 4.2 The Concept Masterplan (Reference CMP-01 C) which supports this planning application and which is copied below for reference, shows development grouped into six parcels; the western area which features apartment blocks facing onto landscaped courtyards and the eastern area which provides three housing parcels. Communal areas are proposed in the centre of the site in the form of a central green and paved square, which could accommodate small, community events.



Figure 1 - Concept Masterplan

- 4.3 A green corridor is provided along the western boundary, incorporating a wide tree band to provide acoustic and visual benefits and a pedestrian link to provide a circular route around the site. Although the proposal is currently in outline, this area could incorporate a trail with natural play or exercise facilities which will blend with the green buffer on the western part of the site. This area will typically incorporate features made from natural materials such as wood and stone and utilise any changes in level to create opportunities for play. This area will ensure that the green corridor is multi-functional providing ecological, visual and amenity benefits and an attractive area for residents to enjoy. Further details of the masterplan design rational are set out below in section 8.
- 4.4 A full Transport Assessment (TA) is being submitted as part of this planning application. The assessment considers the effect the proposal will have on the surrounding road network and also provides details of the proposed access arrangement onto Hulbert Road. The extract below, taken from the TA, shows how the proposals also include a new right-hand turn lane into the site:

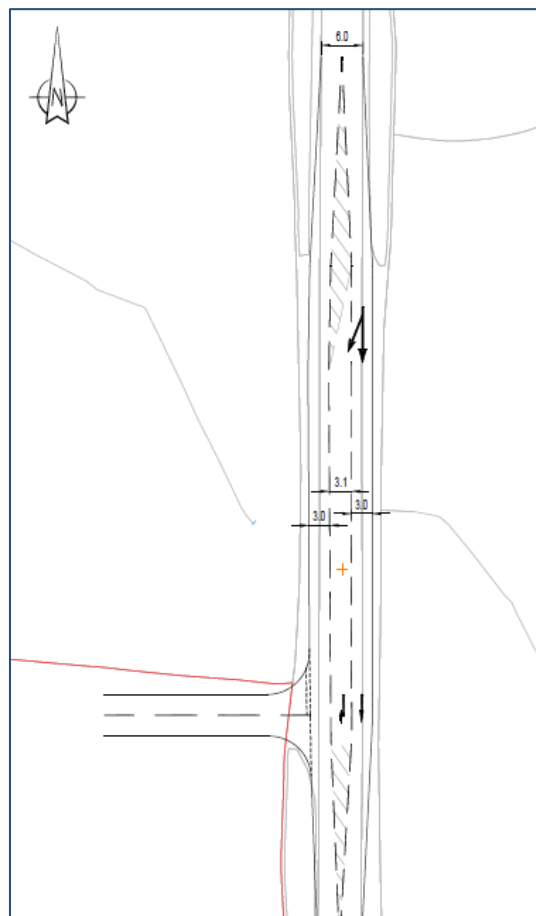


Figure 2 - Proposed Access Arrangements

5. Planning Policy

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 The currently adopted local plan comprises the Core Strategy (2011) and the Site Allocations plan (2014), as well as the Hampshire Mineral and Waste Plan (2013).
- 5.3 HBC have started work on a new local plan to replace the Core Strategy and Allocations Plans. A 'pre-submission' version of the plan was published in early 2019. However, the results of the consultation and new evidence mean changes are required to the draft plan. These are yet to be published and will be subject to a further round of public consultation before being examined by an Inspector appointed by the Secretary of State. Therefore, given the above further changes, consultation and examination required before the plan can be adopted, in accordance with paragraph 48 of the NPPF, the draft Plan is considered to carry minimal weight.
- 5.4 The relevant national and adopted local plan policies are listed below.

National Planning Policy Framework (NPPF)

- 5.5 The most recent version of the National Planning Policy Framework (NPPF) was published in February 2019 and establishes a presumption in favour of sustainable development. Paragraph 2 states that the NPPF is a material consideration in planning decisions.
- 5.6 Paragraph 8 confirms that there are three dimensions to sustainable development – economic (building a strong, competitive economy); social (providing the supply of housing required to meet needs and creating a high quality-built environment); and environmental (protecting and enhancing the natural, built and historic environment). Paragraph 9 confirms that these roles should be delivered through the preparation and implementation of plans and the application of policies, taking into account local circumstances to reflect the need and opportunities in each area.
- 5.7 Paragraph 11 stresses that plans and decisions should apply a presumption in favour of sustainable development. Development plans should positively seek opportunities to meet the development needs of the area, and proposals should accord with an up-to-date development plan. Paragraph 11 is also clear that where there are no relevant development plan policies or

where such policies are out of date, planning permission should be granted unless other policies of the NPPF provide a clear reason for refusing the development or the adverse impacts of doing so would significantly outweigh the benefits.

- 5.8 Footnote 7 clarifies that where a local planning authority cannot demonstrate a five-year supply of housing (including any required buffer) or the Housing Delivery Test indicates that delivery of housing in the previous three years was less than 75% of the housing requirement, then any housing policies should be considered out of date.
- 5.9 In terms of determining applications, paragraph 38 of the NPPF sets out that it is a requirement that Local Planning Authorities should approach decisions in a positive and creative way. This paragraph also states that Planning Authorities should work proactively with applicants to ensure that developments will improve the economic, social and environmental conditions, whilst seeking to approve applications for sustainable development where possible.
- 5.10 Paragraph 47 states that planning law requires applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise. It encourages that decisions on applications should be made as quickly as possible.
- 5.11 Section 5 on housing sets out that the Government is committed to significantly boosting the supply of homes (paragraph 59) in order to meet local needs and help make sure that land with permission is developed without unnecessary delay.
- 5.12 Paragraph 74 confirms that Local Planning Authorities should demonstrate a five-year supply of deliverable housing sites.
- 5.13 Paragraph 73 also confirms that where an Authority has persistently under delivered new housing over the past three years, a buffer of 20% should be applied to provide a realistic prospect of achieving planned supply. The rate of undersupply will be measured against the results of the national Housing Delivery Test introduced alongside the new NPPF. As per footnote 7, if a Local Authority is unable to demonstrate a 5-year supply of housing, their housing policies should be considered out of date.
- 5.14 Design is covered in Section 12, where the Government attaches great importance to the design of the built environment. This policy highlights that good design is a key aspect of sustainable

development, that should be indivisible from good planning, which in turn should contribute positively to making places better for people.

- 5.15 Paragraph 125 stresses that plans should set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Paragraph 126 goes further in stating that maximum clarity about design expectations should be provided at an early stage and plans and supplementary planning documents should use visual tools such as design codes. 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 the area, as long as they fit within the overall form and layout of their surroundings.
- 5.16 Paragraph 177 states 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.

Planning Practice Guidance (PPG)

- 5.17 Planning Practice Guidance (PPG) was published online in March 2014, with periodic updates as national policy is changed or refined. It advises that:

The National Planning Policy Framework represents up-to-date Government planning policy and must be taken into account where it is relevant to a planning application or appeal. If decision takers choose not to follow the National Planning Policy Framework, clear and convincing reasons for doing so are needed. A development that is consistent with the National Planning Policy Framework does not remove the requirement to determine the application in accordance with the development plan unless there are other material considerations that indicate otherwise.

- 5.18 The guidance advises that the statutory development plan is “the plan for the future development of an area”. It consists of:
- Local plans: development plan documents adopted by local planning authorities, including any ‘saved’ policies from plans that are otherwise no longer current, and those development plan documents that deal specifically with minerals and waste.
 - Neighbourhood plans: where these have been supported by the local community at referendum and subsequently made by the local planning authority.

- 5.19 Having regard to the proposed development it is our view that it fully accords with the policies contained within the NPPF.

Housing Delivery Test Measurement Rule Book 2018

- 5.20 The Housing Delivery Test Measurement rule book 2018 (HDT) was published by the government alongside the NPPF to provide a standard way for Local Planning Authorities to measure their delivery rates against their adopted housing requirement or assessed housing need (as relevant).
- 5.21 As set out above, where the HDT reveals that the housing need for the area is not being met, paragraphs 73, 75 and footnote 7 of the NPPF will apply.
- 5.22 Based on the Standard Method of calculating housing need, Havant need to deliver 486 new homes per annum, an increase of at least 171 dwelling per year compared to their existing target.

Local Planning Policy

- 5.23 The adopted Havant Borough Local Plan consists of the Local Plan Core Strategy (March 2011) and the Local Plan Allocations (July 2014). The key policies relevant to this planning application are summarised below.

Local Plan (Core Strategy)

- 5.24 Policy CS1(8) Health and Wellbeing supports development that encourages pedestrian and cycle movements.
- 5.25 Policy CS8 seeks to promote community safety through good design, natural surveillance and well-lit routes.
- 5.26 Policy CS9 sets out the Council's requirements for new housing proposals. Planning permission will be granted for housing proposals that will:
- 1) Contribute to achieving a net total of 6,300 new dwellings between 2006 and 2026.
 - 2) Deliver on average 30-40% affordable housing on sites of 15 dwellings (gross) or more and secure a suitable contribution, or on-site provision, equivalent to on average 30-40% on smaller housing developments between 5 and 14 dwellings (gross), unless a lesser requirement has been transparently justified on viability grounds.

- 3) Ensure mixed communities are created through the planned distribution and avoidance of a concentration of affordable housing.
 - 4) 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.
 - 5) Provide a mix of dwelling types, sizes and tenures which help meet identified local housing need and contribute to the development of mixed and sustainable communities.
 - 6) Provide accommodation for the ageing population in sustainable locations, taking account of the need to provide for a variety of care needs and flexibility to accommodate differing requirements of ageing care.
 - 7) Contribute to achieving 450 extra-care dwellings between 2006 and 2026.
 - 8) Ensure housing development is delivered in a phased manner with an appropriate proportion of previously developed land so as to avoid unnecessary development on greenfield urban extension sites.
- 5.27 Policy CS11 Protecting and Enhancing the Special Environment and Heritage of Havant Borough states that planning permission will be granted for development that recognises the importance of the borough's natural and heritage assets.
- 5.28 Policy CS13 Green Infrastructure seeks to maintain, manage, incorporate and improve existing and new green infrastructure provision.
- 5.29 Policy CS14 promotes the efficient use of resources through the use of renewable energy, efficient building design and sustainable construction.
- 5.30 Policy CS15 Flood and Coastal Erosion Risk states that 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.
- 5.31 Policy CS16 High Quality Design provides detailed criteria to ensure that development is designed to a high standard to help create places where people want to live, work and relax. The policy seeks to ensure proposals reflect local context, produces a positive relationship between buildings, streets and spaces, contributes to the improvement of the public realm, meets the needs of those with disabilities, promotes mixed use developments, mitigates negative environmental impacts

and adapts to the changing needs of users and the changing climate over the lifespan of the building.

- 5.32 Policy CS17 Concentration and Distribution of Development within the Urban Areas states that development in the non-urban areas will only be permitted if it is consistent with the policies for the countryside set out in national policy.
- 5.33 Policy CS20 Transport and Access Strategy promotes development which, amongst other things, improves accessibility to goods, services and employment. Criteria 7 is of particular relevance as it seeks to improve highway, cycling and pedestrian links between the western built up area of the borough (Waterlooville) and the eastern area of the borough (centred on Havant) to create a strong east/west communication axis that passes through Dunsbury Hill Farm/Leigh Park.
- 5.34 Policy CS21 Developer Requirements sets out the on-site, off site and financial contributions which will be sought to support infrastructure provision in the borough.

Local Plan (Allocations)

- 5.35 Policy AL1 Presumption in Favour of Sustainable Development reiterates the approach set out in the NPPF to secure development that improves the economic, social and environmental conditions in the area.
- 5.36 Policy AL2 Urban Area Boundaries (UABs) and Undeveloped Gaps between Settlements defined by the UABs and sets out the type of development which will be permitted within the undeveloped gaps.
- 5.37 DM18 Protecting New Development from Pollution states that planning permission will be granted for development provided that projected levels of air, noise, vibration, light, water or other pollution do not have significant negative affect on the amenity of future occupiers or users of the proposed development.
- 5.38 Policy DM23 Sites for Brent Geese and Waders states that planning permission will be granted for developments that avoid important sites for Brent Geese and/or waders outside of the statutory designated areas, identified on the Policies Map.
- 5.39 Policy DM24 Recreational Disturbance to Special Protected Areas (SPAs) from Residential Development states that planning permission will be granted for residential developments that



avoid or mitigate a likely significant effect on the SPAs, caused by recreational disturbance through the in-combination effect of net additional dwellings.

Summary

5.40 The following sections will demonstrate how the proposals have had regard to and addressed relevant policies.

6. Statement of Community Involvement

Pre-Application Advice and Public Consultation

- 6.1 The site has been actively promoted to the Council since 2016, firstly through the Call for Sites process and more recently, through local plan consultations. Initial discussions with the Council were promising before an apparent “U-Turn” whereby the Council argued that there were a number of technical constraints to development and that the site is “isolated”.
- 6.2 On behalf of the applicants, WYG carried out further technical work and an assessment of the site’s accessibility when compared to nearby facilities and when compared to other sites being promoted favourably by the Council. This exercise demonstrated that a range of services and facilities would be within easy walking distance of the site once the footpath is extended and that this means the site is in a far more sustainable location than others which are being promoted for residential development.
- 6.3 Given these findings, a pre-application advice request was submitted to Havant Borough Council on the 16 November 2018. The submission included details of the relevant technical and planning considerations and a conceptual masterplan to demonstrate how the site could accommodate 120 dwellings. The existing access off Hulbert Road was retained.
- 6.4 Meetings were held with Council Officers on the 12 December 2018 and 4 February 2019. A formal response to the pre-application submission was received from the Council on the 15 February 2019. A summary of the response is provided below:

Summary of HBC Response

- 6.5 The response firstly confirmed that the site lies outside the urban area as defined by policies CS17 and AL2 and as such, an in-principle policy objection is raised. Notwithstanding this, the response also noted a number of technical considerations, summarised as follows:

Housing

- 6.6 The response noted that the proposal should deliver a minimum of 30% affordable housing. Demand for affordable housing in the borough is high, particularly for smaller one and two bedroom properties.
- 6.7 Initial concerns were raised that the site was too remote relative to other residential properties, noting the lack of pedestrian links along Hulbert Road.



- 6.8 It was also confirmed that there are relevant draft policies in the emerging HBLP2036 in terms of housing mix.

Access

- 6.9 The response suggested a full Transport Assessment (TA) and Travel Plan (TP) will be required. Highways England provided details of modelling requirements for the TA.
- 6.10 The Council's Development Engineer indicated that access to the site will need to be made by means of a kerbed radius junction with 4.5m x 120m sightline, and also anticipates that widening of Hulbert Road will be required in order to include a right turn lane and a potential 3m wide cycleway/footway to connect to the Asda roundabout to the south and north to the A3(M) junction.

Ecology

- 6.11 Highlighted that surveys will be required in support of a planning application, particularly in respect of bats, reptiles, badgers and birds.
- 6.12 Noted that the surrounding SINC woodland is of high conservation value and will need to be protected during construction and operational phases via suitable buffering. Public access to woodland will need to be carefully managed in order to prevent deterioration of its biodiversity value. Careful consideration of artificial lighting will be required.
- 6.13 The Council's Landscape Officer also noted the potential for tensions between the requirement for sustainable access and those related to the conservation and enhancement of protected habitats and species.

Noise

- 6.14 The council noted that the site's proximity to the A3(M) and Hulbert Road means that any submission will need to demonstrate that satisfactory living conditions can be achieved for future residents. The Council's Environmental Health team have commented on the submitted D&A Statement as follows:

The current proposed acoustic mitigation measures are insufficient to address the road traffic noise. As I have had no sight of the acoustic report/measurements that provided

the data for the modelling plans, nor any indication as to whether additional mitigation measures could improve site noise levels further, I object to the proposal at this time as I believe the noise levels on the site are still too high for the proposed residential development.

6.15 The Council's Landscape Team noted that:

A soft landscape scheme which retains and enhances the landscape buffer to the west of the site from the A3(M) is required. This will screen the site and retain the character of the A3(M), whilst offering noise mitigation from the busy motorway.

EIA Screening Opinion

6.16 The Council concur that the proposed development does not constitute 'Schedule 2 Development' for the purposes of the EIA Regulations as it does not consist of more than 150 dwellings, nor does the site exceed 5ha.

Open Space Requirements

6.17 The Council highlight that whilst the Development Plan does not currently include any specific policy requirements for open space, the emerging HBLP2036 contains Policy E9 (Provision of Public Open Space in New Development). They conclude therefore that it is likely to be material given the timescale for the submission and determination of any subsequent planning application, and should therefore be given consideration in devising the detailed site layout.

6.18 It goes on to suggest that a strategy for open space provision on the site should distinguish between the buffer zones needed in relation to adjacent trees, the SuDS features, and the buffers to adjacent roads, and which integrates these with the open space requirements - this may mean that some areas are able to have a dual role.

Public Consultation

6.19 In addition to the submission of a pre-application advice request, the proposals were presented to Officers, Councillors and members of the public at a Development Consultation Forum on the 2 April 2019. Details of the site, relevant policies and the proposals were presented, with an opportunity for discussion afterwards.

- 6.20 There was low public attendance at the DCF suggesting minimal concern from the public about the site's development. Councillors at the meeting did not indicate an objection to the principle of developing the site. Debate focused around the footpath links. Firstly, Councillors suggested a footpath link to the north, in addition to the one proposed to the south, would be beneficial. Secondly, there was concern that a route through the trees would be less safe and also cause harm to the woodland. As a result of these concerns, whilst not required for the proposed development, a path to the north has now been incorporated. Furthermore, the proposed route of the paths, both north and south, has been altered to be positioned adjacent to the existing road rather than through the trees.

7. Planning Assessment

Principle of Development

7.1 The Section 38(6) development plan consists of the Havant Borough Local Plan (Core Strategy) and the Havant Borough Local Plan (Allocations).

7.2 Policy CS17 seeks to concentrate development within the urban areas by stating that, Development will be permitted that makes the most effective use of land in the borough by granting planning permission that:

1. Concentrates new housing, employment, retail, leisure and other development within the five urban areas of Havant, Leigh Park, Waterlooville, Emsworth and Hayling Island, as shown on the Proposals Map.
2. Prioritises development on previously developed land, including redundant, derelict or underused land and buildings within the urban area.
3. Broadly distributes the new housing and employment development in the five areas of the borough as indicated on the Spatial Distribution Map (Key Diagram). Development in the non-urban areas will only be permitted if it is consistent with the policies for the countryside set out in national policy.

7.3 Policy AL1 of the Havant Borough Local Plan (Allocations) states 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.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:

- 1) Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or
- 2) Specific policies in the NPPF indicate that development should be restricted.

7.4 Havant Borough Council published details of their 5-year housing land supply position in December 2019, in which it concluded that the Council is able to demonstrate 5.4 years supply of housing, taking into account accumulated shortfall since 2016/17 and the application of a 5% buffer. The calculations are based on the standard methodology as set out in the NPPF. The 5-year housing land supply position means that the Council believe the Local Plan policies to be up to date.

7.5 Policy AL2 of the Local Plan (Allocations) defines the urban area boundaries, as follows:

The urban area boundaries for Emsworth, Havant and Bedhampton, Hayling Island, Leigh Park and Waterlooville are defined on the Policies Map. The Borough's undeveloped gaps are those areas between the urban area boundaries of Waterlooville, Leigh Park, Havant, Emsworth; together with the undeveloped gaps between them and neighbouring boundaries with Portsmouth, Winchester, East Hampshire and Chichester. Planning permissions will be granted for developments within the undeveloped gaps that help to define the separate identity of settlements and prevent their coalescence, and meets any of the following:

- 1) Relates to small scale householder development.
- 2) Meets an overriding public need e.g. For community or recreation use, that cannot be accommodated elsewhere in the Borough.
- 3) Meets the policies for exceptional development in 'rural areas', set out in the NPPF.

7.6 The principle of development is therefore guided by policies CS17, AL1 and AL2. Collectively, these policies seek to direct development to existing built up areas in the borough. However, the Council's 5-year housing land supply update (December 2019) demonstrates that the Council cannot meet its requirements within the existing built up areas. Appendix 2 lists those sites which the Council believes are deliverable up to 2024. At least 14 of the sites which are listed as delivering 50+ dwellings, are outside the built-up areas. This means that the Council accepts that in order to meet its 5-year housing land supply, it will need to rely on urban extension and/or greenfield sites.

- 7.7 On 7 December 2016, the Council adopted the Local Plan Housing Statement as an interim measure to set out which sites it considers could deliver sustainable development to 2036, in advance of the Local Plan 2036 being adopted. The LPHS was the subject of public consultation but not the subject of independent examination and because of this, should carry limited weight in the decision-making process.
- 7.8 Sites included as deliverable in the 5-year supply calculation must be achievable, offering a realistic prospect that housing will be delivered on the site within 5 years. Annex 2 of the NPPF states that to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:
- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
 - b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.
- 7.9 The NPPG reinforces the tests that must be met in assessing the deliverability of sites. It is clear that evidence has to demonstrate 'firm' progress towards delivery and include information and clear evidence to robustly demonstrate when a site will begin providing housing in the 5 year period.
- 7.10 Appendix 2 of the Council's 5-year housing land supply update (December 2019) lists the following as deliverable housing sites, despite the fact that they do not meet the criteria set out at Annex 2 of the NPPF i.e. they do not have outline permission for major development (as of April 2020), they are not allocated in a development plan, have a grant of permission in principle or identified on a brown field register:

Site Reference	Total Delivery	Delivery up to 2023/24
H8 Land North of Long Copse Lane	260	70
H18 Camp Field, Bartons Road	72	72
H15 Land East of Castle Avenue	255	69
H20 Land South of Lower Road	50	50
H29 Land North of Sinah Lane	210	140
H31 Manor Nurseries	15	15
H27 Rook Farm	390	20
H28 Fathoms Reach	55	55
H34 Cabbagefield Row	155	50
H39 Strouden Court	55	55
H44 Padnell Grange	86	86
H40 Campdown	560	90
Total	N/A	772

- 7.11 The above table shows that the Council is relying on at least 772 dwellings to meet its 5-year housing land supply requirement, which do not meet the Government's definition of deliverable. The Council published an identified supply of 2,936 dwellings over the 5-year period 2019/20-2024/25. This means that 26% of the identified supply cannot be defined as deliverable. The consequence of this, if the 772 dwellings erroneously identified as part of the supply are removed, is that Havant are likely to be only able to justifiably demonstrate a supply of circa 4 years of housing – a significant shortfall.
- 7.12 It should be noted that inclusion within the Council's Local Plan Housing Statement does not mean that a site is allocated, as the LPHS is not an adopted Development Plan Document.
- 7.13 The Council also state at paragraph 2.3 of the 5-year housing land supply update, that where there is clear pre-application work and intention to bring the site forward within five years, these sites are included. It is not considered that this approach is justified, either by the requirements of the NPPF or due to the fact that the pre-application process is not public. By including these sites, the Council is effectively pre-determining applications before planning permission is granted or the site is allocated.
- 7.14 On the basis of the rationale set out above, it is not considered that the Council can demonstrate a 5-year housing land supply. As such, paragraph 11(d) of the NPPF applies, which states that



plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means:

- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁷, granting permission unless:
 - i. i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁶; 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.

7.15 Footnotes 6 and 7 apply. Footnote 7 is of significance, which confirms that this includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73).

7.16 It should therefore be concluded that the presumption in favour of sustainable development, as set out in the NPPF, applies. The following sections set out how the proposal meets the economic, social and environmental objectives which help define sustainable development.

Technical Considerations

7.17 Early discussions with officers from the Council's Planning Policy Team, summarised above in section 6, identified specific technical issues which the Council used in its decision to discount Land to the West of Hulbert Road for residential purposes. These are as follows and are considered in more detail below:

- Accessibility
- Ecology and trees
- Stream crossing
- Potential for an emergency services hub

Accessibility

7.18 The site is located in a highly sustainable location, less than one mile from the Asda supercentre (with pharmacy, opticians, paypoint service, cash machine, travel money and café) B&Q, KFC, McDonalds, Co-op, pharmacy, pet shop, several takeaways, Park Lane Medical Centre, Barncroft Primary School, South Downs College, and at least one pub.

- 7.19 During the course of pre-application discussions, the Council has said that the site is “isolated” and is therefore in an unsustainable location. In their pre-application response, dated 15 February 2019, the Council stated that.

“The pre-application site is identified in the Strategic Housing Land Availability Assessment 11th edition (January 2019) under site reference LP127. It is discounted in Appendix 2 for the following reason:

“Site is not suitable for residential development due to its isolated nature. It is better suited for other uses.”

- 7.20 The Council goes on to say that,

“In terms of the matter of isolation, the site is located away from the existing built up area and would not relate to the existing community to the south or west of the site. Furthermore, the site could not accommodate development of a sufficient scale to be considered a community in its own right.

Given that there are clear constraints to development, the site has not been taken forward for housing through the Sustainability Appraisal process in line with the Council's site allocation methodology.”

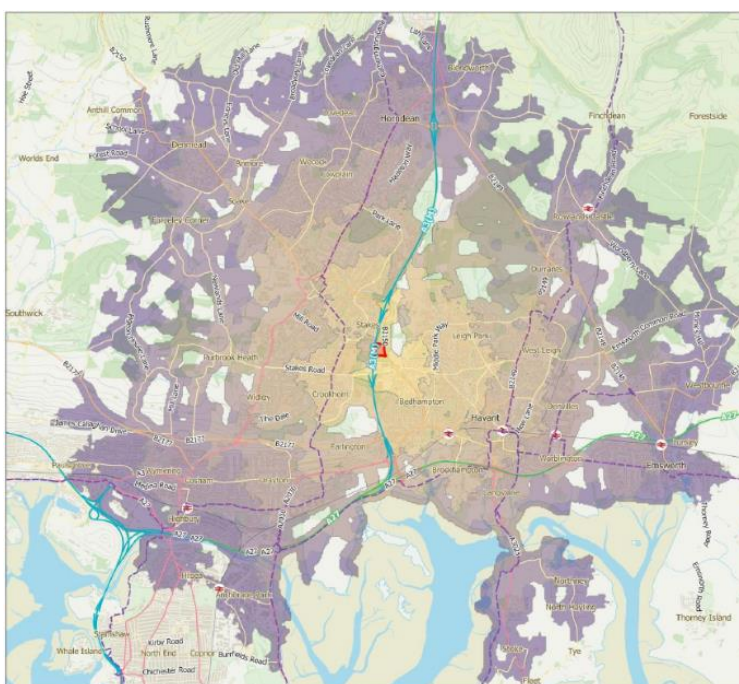
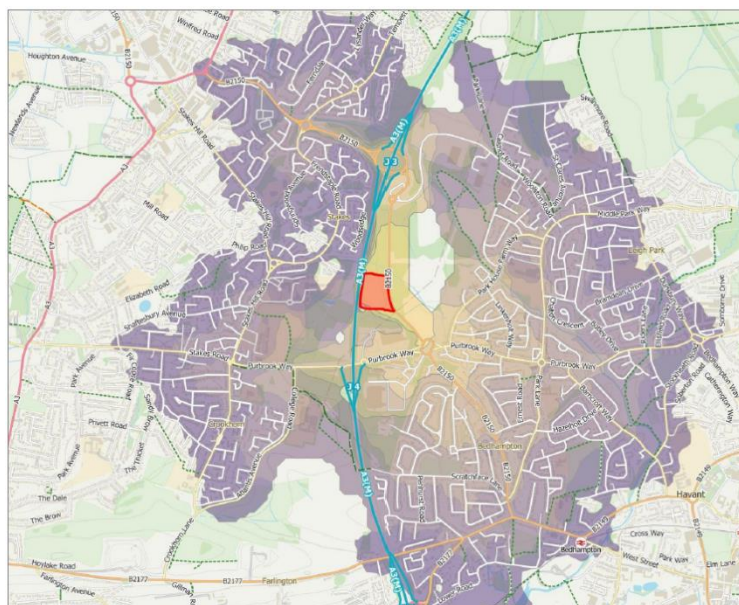
- 7.21 Given the range of services within a mile of the site, and the Council’s decision to support the development of other sites in the Borough which are located further from existing facilities, this statement is contested.

- 7.22 The proposal includes the construction of a new footpath, which will link with the existing footpath at the Asda roundabout, providing pedestrian access to the range of facilities located within the superstore. The footpath will also extend north to the Dunsbury Park roundabout, providing the potential for pedestrian access to this strategic employment site. The footpath will benefit both existing residents in the Bedhampton and Leigh Park area, as well as future residents of the proposed site. Simply because the residential part of the site adjoins woodland, rather than existing, built development, does not mean that it is isolated. Indeed, new green infrastructure, including woodland, is often encouraged as part of residential development, often separating different phases and as such, the proposed relationship between the dwellings and the woodland, is not unusual. Given the wide range of facilities within walking distance, it appears the Council

consider the site isolated simply because it doesn't directly adjoin existing development. This does not make the site isolated when, following the construction of the footpath, residents can access the wide range of facilities at the Asda supermarket, less than 15 minutes' walk away. The Hulbert Road bus stops are only 8 minutes away. The two adjacent Isochrone maps for walking and cycling within 30 minutes of the site clearly demonstrate a wide area can be accessed from the site, encompassing a range of facilities and services.

- 7.23 In addition, the Council has not been consistent with regard to accessibility, when assessing sites through the Sustainability Appraisal process. The Council continues to support sites such as Land North of Longcopse Lane, Emsworth and Littlepark House, Bedhampton, which are no closer to facilities than the application site and are also affected by site specific constraints such as access and

environmental designations. Littlepark House is surrounded by woodland and does not adjoin existing development, providing the same spatial relationship as Hulbert Road. Longcopse Lane is located on the northern edge of Emsworth, approximately 1.25 miles from the shopping facilities in Emsworth Town Centre. Westbourne is closer, although access is currently via a narrow country



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Figure 3 - Walking (top) and Cycling (bottom) Isochrone maps showing 30-minute access distance from the site. More detailed versions can be found at fig 2.2 and 2.3 of the TA.



lane with no footpath. Despite these constraints, both sites are allocated for residential development within the Pre-Submission version of the Local Plan.

- 7.24 The Transport Assessment and Travel Plan which support this application provide further information regarding the site's proximity to local services and how these can be accessed extremely easily, by foot.

Ecology and Trees

- 7.25 The findings of the ecological surveys are described in Section 10 below and demonstrate that the proposal can be delivered without significant harm to protected species or habitats. The Council raised concerns about the impact of the proposal on the surrounding SINC woodland. This has resulted in the proposed footpath being routed along Hulbert Road, rather than through the woodland, to reduce disturbance during construction and the need for artificial lighting once in use.

- 7.26 A full arboricultural survey, impact assessment and method statement will be provided in due course.

Stream Crossing

- 7.27 Although not part of the written pre-application response, Council Officers raised concerns about the impact of the development on the stream crossing the woodland to the south of the site. The development does not impact on this stream, other than it will form part of the wider drainage strategy for surface water.

Potential for an Emergency Services Hub

- 7.28 The applicant has spent a considerable amount of time engaging with the Hampshire Fire and Rescue Service, with a view to incorporating an Emergency Services Hub within the proposals. Indeed, work on this planning application was delayed for approximately 6 months to allow the HFRS to formulate their plans. However, in February 2020, the HFRS advised that,

"At this point in time, we will have to pause our interest in this plot due to the timeline involved and not wanting to pursue a secondary offer that doesn't represent the value of the land."

- 7.29 It is disappointing that the plans for an Emergency Services Hub in this location have not come to fruition, particularly as the applicants have put considerable resource into facilitating the

proposals. It is noted that the site is suggested for an Emergency Services Hub in the emerging local plan, although given the HFRS's current position, deliverability may be in question.

Environmental Impact Assessment

7.30 In their pre-application response, the Council advised that the proposal does not constitute EIA development. However, to comply with the relevant legislation, an EIA Screening Request is being submitted alongside this planning application.

Contributions

7.31 The majority of contributions are covered by HBC's adopted Community Infrastructure Levy (CIL), which will provide a considerable financial contribution towards local infrastructure to support the development.

7.32 A contribution will also be made to mitigate the recreational impacts of the development on the Solent SPA. This contribution will be as per Solent Recreation Mitigation Strategy which sets a defined amount to be paid per property.

7.33 It is expected that the majority of other contributions will be covered by the provisions of CIL. It is expected that this proposal will be subject to a S106 legal agreement, setting out the requirement for either financial contributions or on/off-site measures towards highway and other improvements as appropriate and justified and in accordance with the CIL Regulations.

8. Design Approach

- 8.1 The application is in outline, with only access to be considered. As such, the Concept Masterplan provides only broad parameters, based on the constraints and opportunities identified and in order to comply with adopted planning policies as relevant.
- 8.2 The masterplan is a product of the constraints and opportunities that have been established through the design process. The masterplan Illustrates a scheme of up to 120 dwellings with strong green infrastructure that retains Trees within open spaces around the periphery of the site.
- 8.3 The character of the site is defined by the mature trees and woodland that surround it. The design concept respects and is led by this asset by setting development back from the edges, overlooking peripheral vegetation and open spaces. The green infrastructure offers a network of pathways that provide safe and attractive routes and spaces. The development parcels are designed to allow buildings to face outwards on all sides, ensuring that streets and spaces are well overlooked, welcoming and safe.
- 8.4 A central corridor runs north/south through the centre of the site, providing physical and visual connections to the woodland at either end. This central corridor incorporates a central open space and square, which provide flexible spaces with opportunities for informal recreation that could accommodate small community events. New planting will complement the existing native species and consolidate this important link through the heart of the site.
- 8.5 Development is set back from the western edge of the site to provide distance from the A3 (M). This green corridor incorporates an acoustic bund and fence and buffer planting which provide a pleasant green space. This green corridor forms part of a circular route around the site. Although the proposal is currently in outline, this area could incorporate a trail with natural play or exercise facilities which will blend with the green buffer on the western part of the site. This area will typically incorporate features made from natural materials such as wood and stone and utilise any changes in level to create opportunities for play. This will ensure that the green corridor is multi-functional providing ecological, visual and amenity benefits and an attractive area for residents to enjoy.
- 8.6 Apartment buildings are suggested in the western part of the site to form an additional acoustic buffer to amenity spaces and the rest of the development to the east. Landscaped amenity spaces and courtyards to the east would provide attractive communal areas for residents as well as

accommodating parking. This arrangement would also enable the western green edge to be free from roads.

- 8.7 The following paragraphs of this section set out in more detail how the key features of the masterplan proposals have been devised and incorporated to comply with detailed planning policies:

Retention of the woodland edge around the periphery of the site to provide ecological and Arboricultural benefits, amenity benefits and noise attenuation.

- 8.8 This supports the principles set out in Policies DM8 and CS11, which seeks to protect and enhance the special environment in the Borough, including CS11(2) and (8) which specifically seek to protect natural features and wildlife corridors for their benefits to biodiversity.
- 8.9 This woodland buffer supports the objective of Policy DM8(1) which states that development will be permitted where, amongst other things, it, *"protects natural features of nature conservation and/or amenity importance on the site, for example trees, woodlands, hedgerows, soils, streams, stream corridors, springs, ditches or ponds from damage, destruction and a deterioration in quality"*.
- 8.10 The retention of the woodland will also support the objectives of Policy DM18 which states that planning permission will be granted for development provided that, *"projected levels of air, noise, vibration, light, water or other pollution do not have significant negative affect on the amenity of future occupiers or users of the proposed development"*.

Creation of a circular footpath around the site, linking to the new footpath extending north and south of the site.

- 8.11 The creation of a new footpath, which links to the existing network, will help meet the objectives of Policy CS13, in particular CS13(2) which states that, *"development will be permitted where it incorporates and improves existing green infrastructure through the restoration, enhancement or creation of additional resources"*.
- 8.12 In addition, Policy CS16(1d) supports development which, *"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."* The proposed footpath network will achieve this.

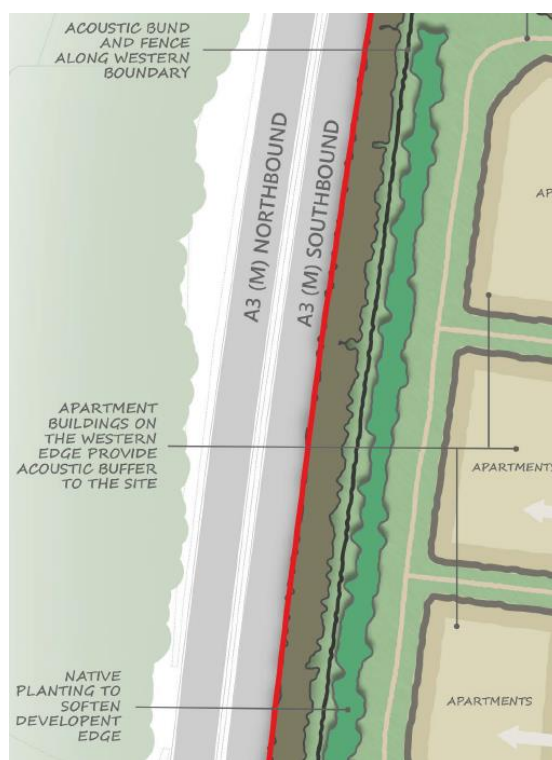
A bund with acoustic fence along the western boundary, with enhanced native planting in-front, to provide an acoustic barrier.

8.13 This will ensure compliance with Policy DM18 which states that planning permission will be granted for development provided that, *"projected levels of air, noise, vibration, light, water or other pollution do not have significant negative affect on the amenity of future occupiers or users of the proposed development"*.

8.14 The bund will also help achieve the objectives of Policy DM10, which provides further criteria for the avoidance of pollution.

Apartments to the west of the site, backing on to the acoustic fence, providing a further "barrier" to noise created by traffic using the A3(M).

8.15 In addition to the planting mentioned above, this will also help ensure compliance with Policy DM18 which states that planning permission will be granted for development provided that, *"projected levels of air, noise, vibration, light, water or other pollution do not have significant negative affect on the amenity of future occupiers or users of the proposed development"*.



8.16 It should be noted that this provides a very similar relationship to that built at the former bowling alley site off Scratchface Lane, further to the south.

A central green corridor extends north-south through the site, providing open space for residents to enjoy and a landscaped link with the woodlands to the north and south of the site.

- 8.17 This corridor helps support the green infrastructure objectives of Policy CS13 and in particular, supports the delivery of Policy CS16(1b) which states that development should, *"integrate with existing local landscape features, promote wildlife and biodiversity and/or apply characteristics of the local area into the design of a scheme wherever possible to create variety and interest"*.

- 8.18 In addition, this corridor will help meet Policy DM8(4) which states that development will be permitted where it, amongst other things, *"ensures sequences of greenspaces are maintained and protects the attractiveness and visual amenity of all green open spaces that contribute to the identity of the borough"*.

A small square is in the centre, which could be used as a community meeting spot or for informal events.

- 8.19 This will help support the delivery of Policies CS8 (Community Safety) and CS16 (High Quality Design) by providing a communal space which benefits from natural surveillance and which will help enhance the public realm.



SUDs are provided in two locations: in the south-east corner of the site and adjacent to the central open space. Further drainage will be provided through the inclusion of permeable paving, particularly under the central square.

- 8.20 The proposed drainage strategy, in which the basins take advantage of the natural fall of the site and the drainage opportunities provided by the natural watercourse running east-west through the southern woodland, will

meet the objectives of Policy CS15, which states that, *"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."*

The eastern part of the site will provide a mix of house types.

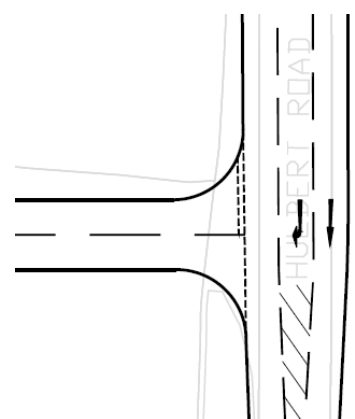
- 8.21 Policy CS9 seeks to ensure mixed communities by providing a mix of dwelling types, sizes and tenures, including 30-40% affordable. Together with the apartments on the western side of the site, the proposal will deliver a range of dwellings to meet varying needs. The exact mix will be determined in consultation with the Council's Housing Officers, having regard to local need.

Where the new footpath between the Asda roundabout and the Dunsbury roundabout passes the site itself, it will be routed along the eastern part of the site, inside the tree line.

- 8.22 The routing of the footpath through the site will help provide a safe and enjoyable route for all users, helping support the objectives of Policies CS11 and CS13, which seek to protect and enhance existing green infrastructure corridors for the benefits of wildlife and sustainable travel.

The access will be in the position of the existing vehicular access and a new right turn lane will be created. By retaining the existing access, appropriate visibility splays can be achieved.

- 8.23 Details of the proposed access, together with an assessment of the impact of the proposal on the local road network, is provided in the Transport Assessment which supports this application. In addition, a Framework Travel Plan is provided. These both help support the objectives of Policy DM12, which seeks to mitigate the impacts of travel.



8.24 As demonstrated above, by working with the existing characteristics of the site, including the strong natural boundaries, and adding new features such as acoustic attenuation and enhanced planting/landscaping, there is an opportunity to provide up to 120 new homes in a scenic and attractive setting, close to existing services and facilities. The creation of a new footpath linking to facilities to the south of the site will also provide significant health and sustainability benefits for residents, who will be able to walk to, from and around the site. Overall, therefore, the key features of the masterplan, informed by pre-app consultation, planning policy and the sites opportunities and constraints, are:

- ✓ A strong green infrastructure network of public open spaces that aid wayfinding and create a high-quality residential environment.
- ✓ Opportunities for formal and informal play within open spaces.
- ✓ A range of linked, multi-functional open spaces and green corridors that provide leisure options and safe pedestrian environments throughout the site.
- ✓ Primary vehicular and non-vehicular access via Hulbert Road, in the location of the existing access point.
- ✓ A new pedestrian footpath along the western side of Hulbert Road (eastern edge of the site), linking south to Asda and B&Q and potentially North to Dunsbury Park. This new footpath will connect directly to existing pedestrian, cycle and bus networks, providing residents with multiple opportunities for onward, sustainable travel.
- ✓ Retain and enhance boundary vegetation to the north, east, south and west.
- ✓ Attractive sustainable drainage features located within green open spaces.
- ✓ An outward looking development that provides a well overlooked and safe public realm.
- ✓ Apartment buildings facing west towards the A3 (M) forming an additional acoustic buffer to amenity spaces and the rest of the development behind.

9. Affordable Housing Statement

- 9.1 This Affordable Housing Statement has been prepared to support an outline planning application for land to the West of Hulbert Road. The purpose of this statement is to set out the proposed approach to affordable housing and how this meets with the relevant national and local planning policy.

Planning Policy Considerations

- 9.2 Details of the adopted development plan, the policies relevant to affordable housing and any other material considerations are described in full at Section 5 of this Planning Design and Access Statement. In summary, these comprise:

Core Strategy Policy CS9: Housing

- 9.3 Policy CS9 sets out the requirement for 30-40% affordable housing on sites of 15 dwellings or more. Policy CS9 states that development proposals will be required to provide a mixture of dwelling types, sizes and tenures which help meet identified local housing need and contribute to the development of mixed and sustainable communities.
- 9.4 Supporting text confirms that schemes providing entirely affordable housing could potentially lead to community cohesion issues with the surrounding area and also fail to contribute to mixed communities. Locally this is a particular issue for the borough which already has some large areas where affordable housing occupation is higher than the national average. The text goes on to say that the location of affordable housing within a development is also important to ensure that it is not concentrated within one area of the development site.
- 9.5 Paragraph 6.20 of the Core Strategy recognises the importance of flexibility when considering housing mix, stating that, "in relation to the tenure split of affordable housing 65-70% of affordable homes should be social rented with the remaining 30-35% for affordable home ownership (often referred to as intermediate housing). However, it is important to allow for flexibility as increasing intermediate housing can slightly improve viability on marginal schemes. However, demand for intermediate housing (such as shared ownership) can vary with market sentiment and as a result there may be occasions where an increased proportion of social rented housing will be acceptable. Flexibility is therefore important to address housing need whilst ensuring mixed communities are created".



Affordable Housing Supplementary Planning Document

- 9.6 The Core Strategy is supported by the Housing SPD (adopted 27 July 2011). Whilst this document is a material consideration, its age means that the requirements are based on data from 2010 or before. As such, while the principles are noted, it is considered that the eventual housing mix and tenure would be better determined through discussions with the Council's Housing Officers, to reflect current demand.

Havant Borough Draft Local Plan 2036

- 9.7 The emerging local plan can be afforded only limited weight due to its early stage of preparation. Notwithstanding this, draft Policy H2: Affordable Housing is based on a more up to date evidence base than Policy CS9 or the Housing SPD and is therefore useful in determining how future proposals are likely to be regarded.
- 9.8 Draft Policy H2 states that planning permission for residential development for a net gain of 11 or more dwellings will be permitted where:
- a. 20% rented and intermediate affordable housing is provided in the town centres of Havant, Waterlooville and Leigh Park (as defined through Policies KS1, KS2 and KS3);
 - b. 30% rented and intermediate affordable housing is provided outside of the town centres of Havant, Waterlooville and Leigh Park;
 - c. The tenure of the affordable housing is split 70% rented and 30% intermediate (shared ownership). The local planning authority will negotiate the appropriate tenure split on a site by site basis based upon the latest evidence of locally identified needs;
 - d. The affordable housing provision is provided on site. In exceptional circumstances, the local planning authority may consider either:
 - i. A financial contribution of a broadly equivalent value in lieu of on-site affordable housing provision; or
 - ii. Off-site provision on another suitably serviced site provided by the developer.
 - e. The development provides mixed and balanced communities with a range, type and size of affordable housing which broadly reflects the market housing element. Affordable housing should be evenly spread across the site and integrated with the rest of the development in line with Policy E6.



The Proposal

- 9.9 The proposal is for up to 120 dwellings on land to the West of Hulbert Road. The scheme will incorporate a mix of building types, sizes and tenures to cater for differing housing needs.
- 9.10 Policy CS9 of the Havant Borough Core Strategy expects that on sites which can accommodate 15 or more dwellings, developers will be expected to provide 30-40% affordable units. The emerging policy from the Draft Local Plan provides a requirement of 30% for areas outside the town centres. This figure is based on more recent viability evidence and more accurately reflects current market conditions. As such, it is proposed that 30% of the dwellings will be affordable, which equates to 36 dwellings. The proposal therefore complies with adopted Policy CS9 and emerging Policy H2.
- 9.11 It is proposed that the tenure split of the affordable housing will be determined in discussion with the Council's Housing Officers, albeit the requirements for a 65-70% social rented and 30-35% affordable home ownership split in the Core Strategy and a 70% rented and 30% intermediate split in the emerging Local Plan are likely to form a basis for these discussions.

Conclusion

- 9.12 The proposed development for up to 120 dwellings will provide a policy-compliant level of affordable housing.
- 9.13 The proposed affordable housing mix and tenure will be informed by the latest evidence base documents for the emerging Local Plan in response to the current housing need, taking into account the Government's new definition for affordable housing.
- 9.14 The affordable housing will be secured through a S.106 which will include the relevant mechanisms to secure its transfer and delivery through an affordable housing provider.
- 9.15 The proposal will make a positive contribution to the affordable housing needs of the local community, providing up to 36 new affordable dwellings.

10. Technical Considerations

- 10.1 There are a series of technical considerations relevant to this proposal, which have been assessed in support of this planning application. The findings of these assessments and details of any recommendations for further assessment or mitigation, are set out below. Overall, the assessments and surveys carried out demonstrate that there are no technical constraints which prevent the development of the site for residential purposes.

Drainage and Flood Risk

- 10.2 The site and surroundings are located entirely within Flood Zone 1 and is therefore assessed as having a lower than 1 in 1000 annual probability of river or sea flooding. Furthermore, there are no historical records of flooding on the site. The topography is largely flat with a gradual fall from south to north.
- 10.3 This planning application is supported by a Flood Risk Assessment (FRA). The FRA concludes that the risk from surface water, ground water, fluvial and coastal flooding is low. As this is an outline application, the drainage strategy, which is based on the concept masterplan, provides a high-level strategy to demonstrate that an appropriate level of attenuation can be provided through SUDs basins to the north of the site. However, as the scheme develops to Reserved Matters stage, the strategy will be reviewed and if necessary, additional measures such as permeable paving, additional detention basins and swales to convey, treat and temporarily store runoff before discharging into the local watercourse network, may be incorporated.
- 10.4 The surface water drainage system will be designed to comply with National Planning Policy Framework and its supporting guidance documents including the Non-Statutory Technical Standards for SuDS. The implementation of a SuDS strategy which will formally connect and attenuate surface water, is proposed. The strategy is based on the creation of SUDs basins in the southern parts of the site which will drain to the existing watercourse in the woodland to the south of the site at greenfield run off rates. Due to the clay rich soil, infiltration as the primary method of drainage is not appropriate, however permeable paving in the centre and periphery of the site will allow some controlled infiltration as part of a comprehensive strategy.
- 10.5 A preliminary foul water drainage strategy has been prepared which flows north, exiting the site at the point of the vehicular access. New pipework will be required along a short stretch of Hulbert Road before connecting to the existing Southern Water manhole. Southern Water has confirmed that there is sufficient capacity.



Air Quality

- 10.6 A site-specific Air Quality Assessment has been carried out in support of this application and will be used to inform the Habitats Regulations Assessment, which will assess the effects of the development upon European Sites including the Solent SPA.
- 10.7 The Air Quality Assessment assesses impacts during both the construction phase and the operational phase. The potential effects during the construction phase include fugitive dust emissions from site activities, such as earthworks, construction and trackout. The impacts during the operational phase take into account exhaust emissions from additional road traffic generated due to the proposed development.
- 10.8 During the construction phase, site specific mitigation measures as detailed within Section 7 of the Air Quality Assessment will be implemented. With these mitigation measures in place, the effects from the construction phase are not predicted to be significant.
- 10.9 The site is located to the east of the A3(M) motorway and to the west of Hulbert Road. However, the site is also surrounded by treed boundaries, which provide a good barrier from the impacts of these two roads.
- 10.10 An operational year assessment for 2021 traffic emissions has been undertaken to assess the effects of Proposed Development. The maximum predicted annual average exposure to NO₂, PM₁₀ and PM_{2.5} at any proposed residential receptor is below the annual average AQO and therefore no additional mitigation is required.
- 10.11 The assessment of the impact description of the effects associated with the proposed development, with respect to NO₂, PM₁₀ and PM_{2.5} exposure, is determined 'negligible' for all identified existing sensitive receptors. The effect on ecological receptors has been assessed and is determined to be 'negligible'.

Noise

- 10.12 Site suitability for residential development is typically first assessed in the context of Professional Practice Guidance on Planning and Noise (May 2017). An initial stage 1 noise risk assessment has been carried out to identify the acoustic challenges affecting the site, which in this instance, relate



to traffic noise from the A3(M) and Hulbert Road. Based upon the highest measured long-term noise levels around the site, in ProPG terms, the development is of high risk at the site boundaries.

10.13 Predicted noise levels have been modelled, based on the following assumptions:

- Buildings fronting on to the A3(M) to the west and Hulbert Road to the East with gardens positioned to the rear (i.e. the dwellings act as a barrier)
- A minimum building height of 8.0 m
- Where feasible external amenity spaces screened from adjacent noise sources through gardens located to the rear

10.14 Based on these assumptions, it is considered that standard double glazing and open windows, as a means of ventilation, may not be acceptable at the extremities of the site adjacent to the A3(M) or Hulbert Road. Alternative passive or mechanical ventilation systems may be required.

10.15 Provided rear gardens are positioned to the rear of buildings fronting the two roads, external noise levels will fall below the target levels (55dB). Notwithstanding this, design measures are proposed to provide further acoustic benefits:

- Positioning of gardens to the rear of properties to provide mitigation for external amenity areas within the site particularly along the western and eastern boundaries.
- Inclusion of the standoff between the A3(M) and nearest residential units along the Western boundary providing provision for leisure walking and cycling routes; and
- A 3m bund with 1.8m fence on top providing substantial screening to the A3(M) representing a good acoustic design measure.

Lighting

10.16 A lighting assessment has been carried out in support of this application. The assessment concludes that provided appropriate mitigation is implemented, the proposal will not result in unacceptable levels of lighting to nearby receptors, including those of ecological value.

Trees

10.17 The site itself is clear of trees. There is woodland to the north and south, which is largely unaffected by the proposals, given that a buffer of approximately 10m is proposed between the woodland edge and built development. This will enable trees to be retained around the periphery of the site, providing ecological, amenity and acoustic benefits.

10.18 At the request of the Council, a footpath is proposed along the western side of Hulbert Road to link the site with the Dunsbury Hill roundabout to the north and the B&Q roundabout to the south. Details regarding the footpath will be provided as part of the future Reserved Matters planning application. This will be based on an Arboricultural survey of the footpath route, identifying any trees which will be removed as part of the proposal.

10.19 A preliminary survey has taken place along the western side of Hulbert Road. This survey has identified trees which pose a risk to safety, with trees or groups of trees being categorised as A (high risk) B (medium risk) and C (low risk). Category A and B trees are recommended for removal or felling to ground or fence level. The trees along the western side of Hulbert Road, most likely to be affected by the proposed footpath, all fall within categories A and B. In addition, the group of trees on the south-east boundary at the edge of the proposed SUDs basin, have been identified as Category B and are recommended for felling to either ground or fence level. This group is subject to a Group TPO (see below) and as such, a second tree survey is scheduled to provide a more in-depth assessment of the trees condition, to support a more detailed design of the footpath route.

10.20 Previous discussions with the Councils' Tree Officer identified the potential for the woodland to hold ancient woodland indicator species in the soil. This has influenced the proposals, with the footpath proposed along the road, rather than through the woodland as initially envisaged. This will lessen the impact on the woodland itself by concentrating tree removal along the periphery of the woodland.

10.21 The closest Tree Preservation Orders (TPOs) to the site are located along the southern boundary (TPO 0955) and to the north: a woodland TPO affecting Neville's Park (TPO 1234). It is expected that the proposals will impact on these designations, but need to be weighed against the public benefits, including a footpath link to nearby facilities and services.

Landscape

6.21 The current proposals are in outline, with Landscaping a Reserved Matter. Notwithstanding this, the Concept Masterplan identifies a broad area of Green Infrastructure along the western boundary to provide. This area is multi-functional, providing acoustic, ecological and amenity benefits and will comprise a footpath as part of a circular route around the site, grassed areas for leisure and recreation and planting to provide ecological and screening benefits.



6.22 The site is well enclosed and is not easily viewed from the wider area. The woodland areas to the north and south prevent views in or out. The treed boundaries to the east and west do allow glimpsed views in and out of the site, the extent of which varies depending on the time of year. Nevertheless, because of these strong boundary features, it is not expected that the development of the site will have a harmful effect on the wider landscape.

Heritage

10.22 The constraints plan which has been prepared as part of this planning application shows that there are no heritage assets on the site or within the immediate vicinity. There are several Grade II Listed Buildings to the west of the A3(M) and a Scheduled Ancient Monument to the south of Purbrook Way. None of these assets will be affected by the proposed development.

Ecology

10.23 A full suite of ecological surveys have been carried out, including a Phase 1 Ecological Survey, a reptile survey, bat survey and dormouse survey. A summary of the findings is provided below:

Phase 1 Ecological Appraisal

10.24 A preliminary ecological appraisal was carried out in the Summer of 2019 to assess the site and surroundings for its potential to support protected notable species and habitat types, as well as potential ecological receptors and any constraints to future development.

10.25 The Ecological Appraisal concludes that the vegetated habitats on site were identified as having suitability for supporting reptiles, dormice, foraging and roosting bats and nesting birds. On this basis, further surveys were recommended.

Reptile Survey

10.26 Although the site contains habitat suitable for reptiles, no reptiles were recorded on site during the surveys.

Bat Activity Survey

10.27 Bat Activity surveys and bat trapping surveys are on-going and have revealed very low numbers of common bats using the site for foraging/commuting. No Bechstein Bats have been recorded. It is considered that these low numbers could be attributed to the proximity of the A3(M) and Hulbert Road. Notwithstanding this, the addition of sensitive planting and bat boxes within buildings and mature trees in the boundaries likely to be highly beneficial.

10.28 On completion of the surveys, full reports will be submitted, setting out the final numbers, together with any proposed mitigation and/or enhancement measures.

Dormouse Survey

10.29 Again, surveys are ongoing, with a full report to be submitted on completion. However, the surveys so far have recorded low numbers. Given the proximity of adjacent woodland, also within the applicant's ownership, enhancements are likely to be recommended by way of compensation.

Designated Sites

10.30 The Ecological Appraisal (2018) for the site identified the following designated sites supporting features with the potential to be affected by the Proposed Development:

- Portsmouth Harbour (RAMSAR, Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI));
- The Wild Grounds (SSSI, Local Nature Reserve (LNR)); and,
- 14 Sites of Importance for Nature Conservation (SINCs).

10.31 There is potential for likely significant effects upon coastal European sites such as the Solent SPA and Portsmouth Harbour SPA. A report to inform the Habitats Regulations Assessment (HRA) will be prepared assessing likely significant effects and avoidance and mitigation measures to demonstrate that there will be no adverse effect on the integrity of these sites. This will include a financial contribution in line with the charging schedule as detailed in the Solent Recreation Mitigation Strategy and an explanation of how the scheme has been designed to achieve Nitrogen neutrality.

Access and Transport

10.32 Access to the site will be via the existing access off Hulbert Road. A new right-hand turn will be created for vehicles accessing the site from the north, to prevent congestion along Hulbert Road. Figure 4 below shows the proposed access arrangements on the left hand image and the extent of the visibility splays on the right hand image. Further details can be found in the Transport Assessment which supports the planning application.

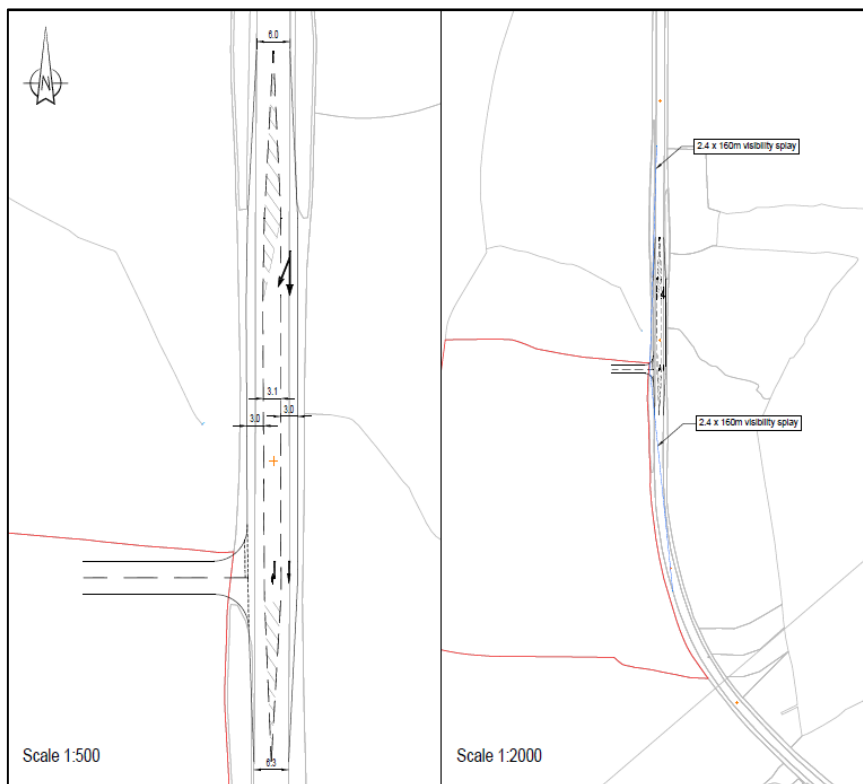


Figure 4 - Proposed Access Arrangements and Visibility Splays

Mineral Safeguarding

10.33 The site is included in a Mineral Safeguarding zone for Oil and Gas according to HCC's online Policy Mapping service. However, the previous operators of the Hydrocarbon exploration exercise on site have not pursued further exploration appraisal or exploitation of the site and no longer have a interest in bringing the site forward. Furthermore, paragraph 6.120 of the Minerals and Waste Plan recognises that Oil and Gas exploration and Processing operations have 'far more flexible locational requirements compared to other minerals developments. Therefore, with minimal prospect of the site coming forward for hydrocarbon exploitation, the site can be developed for housing without sterilising access to important minerals.

Utilities

10.34 A full utilities appraisal has been carried out and the location of all services mapped. The utilities plan shows that there are no services affecting the site itself. A number of services run north-south along Hulbert Road. Foul and surface water sewers are located to the north of the site, running east-west through the woodland. It is proposed to drain the development into this existing infrastructure, subject to approval from Southern Water.



10.35 Overall, it is not considered that the location or availability of existing utility infrastructure presents a constraint to development of the site.



11. Conclusion

- 11.1 WYG has prepared this Planning, Design and Access Statement, incorporating an Affordable Housing Statement and Statement of Community Involvement, on behalf of the applicant, in support of a planning application for the development of up to 120 new homes on land to the West of Hulbert Road, Havant.
- 11.2 This Planning Statement, along with the other documentation submitted in support of the application confirms that the proposed development complies with the relevant national and local planning policies and is acceptable having regard to the key technical and planning considerations.
- 11.3 The proposed development site on land West of Hulbert Road, occupies a sustainable location benefitting from good access to footpaths, public transport links, cycle routes and local shops and primary school.
- 11.4 In conclusion, this Planning, Design and Access Statement demonstrates that there are no policy, technical or development constraints which prevent this proposal from coming forward. The scheme, as described in this statement and illustrated on the Concept Masterplan, complies with the relevant policies of the NPPF and the criteria set out in the adopted Havant Borough Local Plan. As such, it is respectfully requested that favourable consideration is given to this proposal and planning permission is granted.