

Planning Statement

Land at Padnell Grange, Padnell Road,
Cowplain, Hampshire, PO8 8ED

January 2019

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Client

Bellway Homes Ltd (Wessex) & The Borrow Foundation

Our reference

BELW3005

31 Jan 2019

1. Introduction

1.1 This Planning Statement has been prepared by Turley in support of a planning application made to Havant Borough Council ('the Council') as Local Planning Authority (LPA) for the approval of 86 residential dwellings and associated works ('the Proposed Development') on Land at Padnell Grange, Padnell Road, Cowplain, Hampshire, PO8 8ED ('the Site'). A copy of the location plan for the Proposed Development is included in Appendix 1.

1.2 The full description of development for the Proposed Development as set out in the application form is as follows:

"Demolition of existing Padnell Grange and ancillary structures and erection of 86 dwellings with associated parking, landscaping, SUDS and other drainage works."

1.3 The joint applicants for this planning application are Bellway Homes Limited (Wessex) and The Borrow Foundation. Bellway Homes are a leading national housebuilder who hold a development option on the Site and the Borrow Foundation are the landowners of the Site.

1.4 The principle purpose of this Planning Statement is to test the compliance of the Proposed Development against prevailing national and local planning policy guidance.

Bellway Homes

1.5 Bellway Homes is one of the largest housebuilders in the UK developing new homes and communities across the country. In just over 70 years, Bellway Homes has grown from a small, family-owned firm to one of the most successful house builders in the UK. Today they directly employ more than 2,000 people and have earned an enviable reputation, built on the pillars of quality, service and trust.

The Borrow Foundation

1.6 The Borrow Foundation is a UK registered charity who look to promote the improvement of oral health, primarily in children, through the prevention of oral diseases. Since the Foundation was first established in 1971, it has worked in the field of milk fluoridation and in more recent years has expanded its work to look at other wider areas of oral disease prevention.

Structure of Planning Statement

1.7 The sections of this Planning Statement are structured as follows:

- **Section 2 – The Site and Surrounding Area:** describes the location of the Site and its features as well as those of the surrounding area.
- **Section 3 – Planning History:** sets out the planning history of the Site.
- **Section 4 – Planning Policy:** establishes the policies and other material considerations relevant to the proposals.

- **Section 5 – Pre-Application and Community Engagement:** discusses the pre-application work carried out by the project team and how both the Council and the public were engaged in this process.
- **Section 6 – The Proposals:** explains what the Proposed Development consists of.
- **Section 7 – Assessment of the Proposals:** assesses the Proposed Development's compliance with relevant planning policies and guidance.
- **Section 8 – Housing Mix and Affordable Housing:** establishes the housing mix and provision of affordable housing to be provided by the Proposed Development and assesses its compliance with policy.
- **Section 9 – Obligations Statement:** identifies the planning obligations needed to make the Proposed Development acceptable in planning terms.
- **Section 10 – Conclusions:** provides key conclusions and an overview of the planning case for the Proposed Development.

2. The Site and Surrounding Area

Site Description

- 2.1 The Site is an irregular shaped piece of land measuring approximately 2.64 hectares in area and is situated in Cowplain at the eastern end of Padnell Road between Cherry Tree Avenue to the west and south, Waterloooville Golf Course to the east and Padnell Cuts Wood to the north.
- 2.2 The Site is currently occupied by several buildings the most notable of which is Padnell Grange; a large 19th Century residential building. To the south of Padnell Grange is a collection of outbuildings associated with the former agricultural and industrial uses of the site. Although the majority of these outbuildings have fallen out of use, the eastern grouping is used as an office and parts of the northern grouping are used for storage. There are a number of large, mature trees on the Site with a particularly large concentration in the north-west section of the Site. Several of these trees are protected under Tree Preservation Orders (TPOs).

Surrounding Area

- 2.3 The Site is in the ward of Cowplain and is located on the eastern edge of Cowplain.
- 2.4 The surrounding area is predominantly residential in nature with Waterloooville Golf Course to the east and the A3(M) beyond that. Waterloooville Golf Course has been identified as a Site of Importance for Nature Conservation by the Council. Padnell Cuts Wood forms a wooded buffer between the Site and the existing residential development to the north.
- 2.5 There are a number of facilities to the west of the Site, approximately 500m away, including Padnell Infant and Junior Schools and the Cowplain Activity Centre and its associated tennis courts and bowling green, sports pitches and a children's play area. Further west beyond these on London Road are a number of shops, cafes, restaurants and take-away outlets which are associated with Cowplain's district centre (as defined in Havant Borough Core Strategy Policy CS4), and are approximately 750-1,000m away from the Site and The Cowplain School, the nearest local secondary school, is 1,400m away.
- 2.6 The Site is well served by public transport. The nearest bus stops are located approximately 350m from the Site on Padnell Road and provide hourly bus services to Havant and Petersfield. Additional bus services can be accessed from bus stops on London Road which are approximately 800m from the Site and provide frequent services between Clanfield and Southsea, via Portsmouth and Waterloooville, every 15 minutes. Regular trains to London, Portsmouth, Southampton and Brighton can be accessed from stations in neighbouring areas including Havant, Cosham and Bedhampton.

3. Planning History

- 3.1 Based on inspection of the Council's online public access system, the Site has been the subject of a number of planning applications in relation to the existing buildings.
- 3.2 In August 1993, planning permission (ref: 92/53709/002) was granted for alterations to the remaining buildings and the construction of associated car parking to the south and south-east of the existing buildings to facilitate a change of use to offices. Planning permission (ref: 97/53709/003) was then subsequently granted in September 1997 for a variation of Condition 1 so as to extend the time period for the commencement of this development. A further planning permission (ref: 02/53709/006) was the granted in March 2003 to again vary Condition 1 so as to extend the time period for the commencement of this development
- 3.3 In June 1999, planning permission (ref: 99/53709/004) was granted for a change of use to a professional training centre together with associated parking and other external alterations.
- 3.4 Then in December 2009, planning permission (ref: 09/53709/009) was granted for a change of use of the professional training centre to form offices on part of the ground floor and residential accommodation on the remainder of the ground floor as well as the first floor.
- 3.5 Most recently in June 2015, prior approval (ref: APP/15/00452) was granted for a change of use from office use to residential use.
- 3.6 During this time there have also been a number of applications made and permitted for arboricultural works to the various trees on the Site that are protected by Tree Preservation Orders.

4. Planning Policy

- 4.1 Section 38(6) of the Planning & Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 The Development Plan in this case comprises the following:
- Havant Borough Local Plan (Core Strategy), adopted in March 2011;
 - Havant Borough Local Plan (Allocations), adopted in July 2014; and
 - Hampshire Minerals and Waste Plan, adopted in October 2013.
- 4.3 The new National Planning Policy Framework (NPPF), adopted in July 2018, and the Planning Practice Guidance, a living document first created in March 2014, are material considerations and have been carefully taken into account in the Proposed Development.
- 4.4 Other material considerations that are relevant and have been allowed for in the Proposed Development include:
- Borough Design Guide SPD, adopted in December 2011;
 - Housing SPD, adopted in July 2011;
 - Residential Parking and Cycle Provision SPD, adopted in March 2010; and
 - Provision and Improvement of Playing Space for New Housing Development SPG, adopted in November 2004.

National Planning Policy

- 4.5 At the heart of national planning policy is the presumption in favour of sustainable development as set out in paragraph 11 of the NPPF. In terms of decision taking this means development proposals that accord with an up-to-date Development Plan should be approved without delay.
- 4.6 Paragraph 48 of the NPPF establishes that LPAs may give weight to relevant policies in emerging plans according to how progressed the emerging plan is, the extent to which there are unresolved objections to relevant policies and the degree to which the emerging policies are consistent with the NPPF.
- 4.7 Paragraph 59 reiterates that to support the Government's objective of significantly boosting the supply of homes it is important that a sufficient amount and variety of land can come forward where it is needed.
- 4.8 Paragraph 117 promotes the effective use of land in decision making to meet the need for homes and use as much previously developed land as possible.

- 4.9 Paragraph 124 explains that the creation of high quality buildings and places is fundamental to what the planning process should achieve with good design being a key aspect of sustainable development.
- 4.10 Add in para on weight to emerging plans, and where adopted plan in conformity with NPPF.

The Development Plan

- 4.11 The starting point for decision making in planning in the Borough of Havant is the Development Plan which comprises the two constituent parts of the Havant Borough Local Plan – the Core Strategy and Allocations documents, as well as the Hampshire Minerals and Waste Plan.
- 4.12 Policies contained in these documents that are relevant to this application include the following:
- Policy CS1 – Health and Wellbeing;
 - Policy CS9 – Housing;
 - Policy CS11 – Protecting and Enhancing the Special Environment and Heritage of Havant Borough;
 - Policy CS13 – Green Infrastructure;
 - Policy CS14 – Efficient Use of Resources;
 - Policy CS15 – Flood and Erosion Risk;
 - Policy CS16 – High Quality Design;
 - Policy CS17 – Concentration and Distribution of Development within the Urban Areas;
 - Policy CS19 – Effective Provision of Infrastructure;
 - Policy CS20 – Transport and Access Strategy;
 - Policy CS21 – Developer Requirements;
 - Policy AL1 – Presumption in Favour of Sustainable Development;
 - Policy AL2 – Urban Area Boundaries and Undeveloped Gaps between Settlements;
 - Policy WA1 – Waterloooville Housing Allocations;
 - Policy W126 – Padnell Grange
 - Policy DM11 – Planning for More Sustainable Travel;

- Policy DM12 – Mitigating the Impacts of Travel;
- Policy DM13 – Car and Cycle Parking on Residential Development;
- Policy DM17 – Contamination;
- Policy DM18 – Protecting New Development from Pollution;
- Policy DM24 – Recreational Disturbance to Special Protected Areas (SPAs) from Residential Development;
- Policy 10 – Protecting Public Health, Safety and Amenity; and
- Policy 15 – Safeguarding – Mineral Resources.

4.13 Specifically, Policy WA1 allocated Padnell Grange for the residential development of 84 dwellings with planning permission to be granted provided “that detailed proposals are broadly consistent with the indicative provision for the number of dwellings” and “take account of all site specific development requirements.”

4.14 Policy W126 identifies that the Site is subject to a number of known constraints including:

- TPOs on the Site;
- Potential ground quality issues associated with previous and current uses of the Site;
- The Site includes or is close to existing sewerage infrastructure and that the capacity in the sewerage network closest to the Site has limited capacity;
- The Site is adjacent to a Site of Importance for Nature Conservation; and
- Low to moderate potential for previously unidentified archaeological deposits.

The Policy considers that the key opportunity for the Site will be the delivery of new homes including affordable housing.

Site specific requirements for development include:

- Utilising the existing access point onto Padnell Road;
- The inclusion of a Heritage Statement to support a planning application;
- The design and layout should aim to retain and protect TPO trees;
- Investigate ground quality conditions, as part of a planning application, and address any matters that arise;
- Addressing any potential effects upon the Hazleton Common SINIC;
- Connecting to the sewerage system at the nearest point of adequate capacity; and
- Including an appropriate easement from existing sewerage infrastructure.

4.15 All the aforementioned policies of the Development Plan have been carefully considered in preparing this planning application and are considered in further detail in the next section.

Emerging Local Policy

- 4.16 The Council are currently preparing the Havant Borough Local Plan 2036 which will eventually supersede the Havant Borough Local Plan (Core Strategy) and Havant Borough Local Plan (Allocations).
- 4.17 The Havant Borough Local Plan 2036 is currently at the Pre-Submission (Regulation 19) stage and is being consulted on between 4th February and 18th March 2019 following earlier consultation on a draft version (Regulation 18) in January and February 2018. We submitted representations to the consultation on the draft version and these are included at Appendix 2. The Council is anticipating submitting the Havant Borough Local Plan 2036 to the Secretary of State for Housing, Communities and Local Government in Summer 2019 before adopting it in Spring 2020.
- 4.18 The Havant Borough Local Plan 2036 continues to allocate the Site for residential development as set out in emerging Policy H44. However, in accordance with paragraph 48 of the NPPF the weight that can be assigned to this policy in the decision making process is limited. This is because modifications may be required prior to submission to the Secretary of State following the current pre-submission consultation and there are unresolved objections to what are fundamental parts of the policy, namely the retention of existing buildings and features on the Site.

5. Pre-application and Community Engagement

- 5.1 Bellway Homes and its project team have engaged in a substantial consultation programme with the Council and local communities prior to the submission of this planning application.
- 5.2 This started with pre-application discussions with the Council and a request for formal pre-application advice. This advice (LPA ref: GEN/17/01194) which was received on 8th November 2017 identified a number of key issues in relation to the unallocated land in the north-east corner of the Site, the relationship with existing trees, the retention of the existing buildings and footpath link, garden depths and measures to discourage the use of Cherry Tree Avenue. A copy of the pre-application advice received from the Council is included at Appendix 3.
- 5.3 Following this the layout of the Proposed Development was reconsidered with a number of changes being made including removing any built form from the unallocated part of the Site, redistribution of the proposed dwellings to improve relationships with existing trees, increases in garden depths to ensure privacy and amenity for existing dwellings on Cherry Tree Avenue.
- 5.4 To engage local neighbours a leaflet was sent out on 23rd November 2018 to neighbouring residents explaining the history of the Site as an allocation, the development proposals and ways of providing feedback through in writing, via e-mail or over the phone. The end of this neighbourhood consultation was at 17:00 on 3rd December 2018.
- 5.5 In total 14 representations were made to this neighbourhood consultation before it ended. Several key concerns were raised namely:
- Increased traffic congestion on surrounding roads and junctions;
 - Existing parking issues will be exacerbated;
 - Concerns over the form and responsibility of the proposed boundary treatment between existing properties and the Site;
 - Disruption caused during construction including issues around construction traffic; and
 - Retention and design of access to Bridleway and Public Right of Way.
- 5.6 A copy of the leaflet is included for information at Appendix 4.
- 5.7 Following this neighbourhood consultation, the Proposed Development was also put forward for consideration at one of the Council's Development Consultation Forums. This was held at the Council's offices on 11th December 2018 and involved presentations from project team and Council officers to local residents, ward Councillors and local amenity groups, and a related question and answer session

addressed by the project team. The public were also able to provide written feedback after the Forum closed. A copy of the Forum presentation is included at Appendix 5.

5.8 The key issues raised at the Forum were:

- Matters of design and layout including the character and mix of the development, whether existing buildings could be re-used, the suitability of using land on the Site that is currently outside the boundary of the adopted allocation and the proximity of new dwellings to existing neighbouring residential properties and the golf course with the associated landscaping requirements;
- The provision of affordable housing;
- The impact of the Proposed Development on the wider landscape, especially given the Site's proximity to a SINCR and Public Rights of Way;
- The impact of the Proposed Development on protected species, including Bechstein Bats;
- The protection of trees given that there are a number of trees protected by TPO both on and adjacent to the Site; and
- Highways considerations.

Design Response

5.9 Following a review of all of the issues raised key amendments were incorporated into the design and layout of the proposals. These included :

- Repositioning the built extent of the layout to exclude any development in the north-east corner, which is outside of the adopted allocation;
- Retention of all of the better specimen TPO trees;
- Retention of the existing conifer trees along the western boundary and provision of additional low level planting;
- Provision of new fence along western and southern boundary adjacent to the existing fence;
- Re-positioning of properties further distant from the western and southern boundaries;
- Inclusion of hipped roof form on Plot 86 to further reduce massing and impact on adjacent existing dwelling;
- Inclusion of 3m wide upgraded and formal public right of way through development;

- Diverting foul and surface water run-off from development to new connection south along Cherry Tree Gardens and capping-off existing connection to avoid impact on adjacent gardens;
- Inclusion of more significant legacy tree planting in key locations within development; and
- Incorporation of 4 bed affordable property within the proposals.

6. The Proposals

- 6.1 It is proposed that all the existing buildings on the Site will be demolished with the Site then being redeveloped to create 86 residential dwellings, of which 25 will be provided as affordable housing. The layout of these dwellings has been designed to respond to the existing site constraints and to provide a clear structure with ease of access and permeability to the surrounding roads and paths. A copy of the proposed layout plan is included at Appendix 6.
- 6.2 A mix of dwellings will be provided including 1 and 2 bed flats and 1, 2, 3 and 4 bed houses. Details of the proposed housing mix, including affordable housing, and its compliance with policy are addressed further in Section 8.
- 6.3 Access to the Proposed Development will utilise the existing access off Padnell Road. From this access a main spine road will run through the Site with areas of shared surface coming off this. The alignment of this road takes has been considered in relation to the topography of the Site and has been designed to encourage low vehicle speeds in keeping with the residential environment without the need for any vertical traffic calming features.
- 6.4 Several areas of open space will be provided around the trees protected by TPO with one of these open spaces incorporating the grave that exists on the Site. A further area of open space will be provided in the north-east corner of the Site adjacent to Padnell Cutts Wood and will include a pond. These open spaces together with the gardens of proposed dwellings, the retention of existing trees and hedges and the addition of further planting will complement and enhance the existing landscape and lead to a net gain in biodiversity.

7. Assessment of the Proposals

Site Specific Policy and Principle of Development

- 7.1 The majority of the Site is identified as an allocation for residential development in the Havant Borough Local Plan (Allocations) under Policy WA1, site reference W126, for an indicative capacity of 84 dwellings. By allocating this part of the Site for residential development the Council therefore considers this to be an appropriate use for the land and a principle of development is established.
- 7.2 Policy WA1 requires that development proposals are broadly consistent with the indicative number of dwellings suggested and with the Proposed Development comprising 86 dwellings this is a negligible increase on the indicative 84 dwellings the Council identified.
- 7.3 The far north-east corner of the Site lies outside of the allocation area and is currently outside of the urban area boundary identified on the Policies Map. Therefore a principle of development has not yet been established for that part of the Site. We have previously made representations to the emerging Havant Local Plan 2036 to have this part of the Site included within the wider allocation. The basis for this is that the north-east corner forms an obvious part of the wider Site given it is a contiguous part of the grounds and is screened by Padnell Cuts Wood to the north and west and an existing hedge to the east which separates the Site from Waterloooville Golf Course. However, in recognition that the far north-east corner is not within the urban area boundary the Proposed Development does not include any built form within this area. Instead it will provide an attenuation basin that will form part of the Site's wider Sustainable Drainage System (SuDS) and also provide opportunities for biodiversity gain. Such a proposed use is considered appropriate for this part of the Site given its character and designation.

Impact on Neighbours

- 7.4 The amenity of neighbouring properties has been a careful consideration during the design phase. Where new dwellings along the Site's southern and western boundaries back on to the existing properties, including bungalows, on Cherry Tree Avenue the separation between the new and existing dwellings exceeds the 24m required by the Borough Design Guide SPD. Windows in the new dwellings have been positioned so they will not face directly on to the windows of existing properties.
- 7.5 A new fence around the southern and western boundaries along with new under-storey planting combined with differences in levels across the Site will help to further reduce any impact on neighbours and ensure that existing dwellings retain a good level of visual amenity.

Heritage

- 7.6 As part of the Proposed Development the existing Padnell Grange building and its outbuildings will all be demolished. The accompanying Heritage Statement has

considered this approach to be acceptable on the grounds that none of the buildings are of historic merit. None of the buildings have been statutorily or locally listed, neither are they within a Conservation Area or its setting. There is also no requirement in the adopted allocation or the wider Development Plan for the buildings to be retained.

- 7.7 In particular it is noted that the Grange building does not possess any particularly noteworthy features and is generally typical of its type and style whilst the office buildings only retains elements of its original 19th Century fabric and as a whole has little architectural or historic value.
- 7.8 Furthermore the draft Padnell Grange Development Brief which had been prepared for the Site originally as part of the evidence for the Havant Borough Local Plan (Allocations) found that “The Grange Buildings’ architectural value has been comprised by modern extensions”.
- 7.9 As such it is therefore considered there is no statutory or policy obligation to retain the existing buildings on the Site and they are not considered to represent a constraint to the comprehensive redevelopment of the Site.

Urban Design

- 7.10 As set out in the accompanying Design & Access Statement, the design of the Proposed Development has been carefully crafted to take account of the Site’s constraints including the existing trees, the Public Right of Way (Footpath No. 127) and the fact the Site backs onto existing residential dwellings along Cherry Tree Avenue.
- 7.11 Along the southern and western boundaries of the Site the Proposed Development comprises 2 storey dwellings with rear gardens that back onto the existing dwellings of Cherry Tree Avenue with sufficient back to back distance of at least 24m between the dwellings as identified in the Borough Design Guide SPD. New dwellings will also back on to the eastern boundary of the Site so that their rear gardens will form a suitable buffer between built form and the Waterlooville Golf Course meaning the existing hedge will be retained and continue to provide ecological habitat.
- 7.12 The north-west corner of the Site will comprise some larger detached and semi-detached dwellings at a lower density to take account of their setting amongst a collection of existing mature trees. The central part of the Site which is least constrained will have the greatest density of housing in the Proposed Development and comprise a mix of detached, semi-detached and terraced dwellings all of two storeys as well as a single 2.5 storey building incorporating dormer windows.
- 7.13 The density of the Proposed Development as a whole is 30.8 dwellings per hectare which is broadly consistent with the density of the existing dwellings to the west of the Site on Cherry Tree Avenue which have a density of 33.4 dwellings per hectare. The Proposed Development would therefore be a low density development when compared to the thresholds set out in paragraph 6.21 of the Havant Borough Local Plan (Core Strategy) which is appropriate given the character of the area and the edge of settlement location adjacent to the Waterlooville Golf Course.

- 7.14 The extensive use of shared surfaces will ensure that the car is not seen as dominant in the hierarchy of street users and will encourage slow vehicular speeds appropriate for a residential area.
- 7.15 It is therefore considered that the Proposed Development is of a high quality design and is compliant with Policy CS16.

Trees

- 7.16 There are a number of existing trees on the Site and along its boundaries where hedges can also be found. The Site abuts Padnell Cuts Wood to the north where a number of trees overhang the Red Line Boundary of the Proposed Development. Of the trees on the Site, 22 individual trees and four tree groups are protected by Tree Preservation Order (TPO) No. 1980.
- 7.17 As previously discussed the trees on the Site have been a significant guide in determining the layout of the Proposed Development. In order to accommodate the Proposed Development it will be necessary for 16 individual trees, 6 tree groups and 1 hedge to be removed. Of these, 1 individual tree falls within Category B indicating it is of moderate quality albeit it is small in size. The rest of the trees to be removed fall within Category C indicating they are of low quality due to their poor condition or small size with little potential to contribute to local character because of the backdrop of large tree to be retained. Of these Category C trees, 3 are protected by TPO No. 1980 however it is considered these 3 trees are all of low quality for the reasons previously described. The trees that will be lost are all well within the Site and are not individually prominent whilst the significant retained trees will buffer any loss to the extent that there will be no impact on local character. This combined with the potential for sustainable new planting on the Site means there will be no long term detrimental impact on tree health or local character.
- 7.18 There will be some encroachment into the Root Protections Areas (RPAs) of several retained trees in the form of new no-dig surfacing. However, following careful review of the levels in these areas it is feasible to install custom designed no-dig specification surfacing without causing any significant disturbance to the RPAs and without any long-term detrimental impact on tree health.
- 7.19 Adequate precautions will be put in place to protect the retained trees during construction works. These are outlined further in the accompanying Arboricultural Method Statement but will include supervision by a qualified arboricultural consultant during construction works, on-site pre-commencement meeting with all construction parties, the installation of fencing and ground protection and the use of pollution control measures.
- 7.20 New tree planting as part of the comprehensive landscaping plan for the Proposed Development will overall enhance the contribution of the Site to local character and more than compensate for the loss of any existing trees. As such the Proposed Development is considered compliant with Policies CS11 and CS13.

Biodiversity

- 7.21 The Site has been the subject of extensive of ecological investigation. Following an initial desk study further investigations have been carried out including an extended Phase 1 Habitat Survey, a Phase 1 Bat Scoping Survey and subsequent bat surveys, and a Badger Survey.
- 7.22 The Ecological Appraisal which accompanies this application has concluded that part of the south-eastern corner of the Site falls within the 5.6km Impact Risk Zone for the Chichester and Langstone Harbour SPA. Although the Proposed Development is unlikely to impact on the SPA's habitats directly there may be the potential for additional recreational pressure. Any additional recreational pressure arising from the Proposed Development would not be expected to result in a significant effect on the SPA in isolation, albeit to avoid risk of any cumulative effect on the SPA a financial contribution to the Solent Recreation Mitigation Strategy will be required.
- 7.23 There is a SINC adjacent to the Site designated for its areas of ancient semi-natural woodland, unimproved neutral grassland and heathland vegetation. The Proposed Development is expected to have no impact on the integrity of these habitats subject to the implementation of standard measures to avoid the spread of dust during construction and maintaining the quality, quantity and constancy of water leaving the Site along its boundary with the SINC.
- 7.24 The Site itself is dominated by habitats of negligible value in their own right and are considered to be of low local value. With regards to local bat populations, it is considered that through mitigation and enhancement methods such as planting improvements and the careful use of external lighting the Proposed Development the favourable conservation status of local bat populations will be maintained and potentially enhanced. Further information can be found in the accompanying Bat Survey Report.
- 7.25 Although no badgers have been recorded at present on the Site, their mobile nature will necessitate an additional survey prior to the commencement of development to ensure this status has not changed. Construction activities will also need to take into account the potential for occasional foraging.
- 7.26 The Site is considered unlikely to support assemblages of breeding birds. Notwithstanding this the removal of trees and scrub vegetation and the demolition of buildings should avoid the bird breeding season. If this is not possible, a search for nesting birds will need to be undertaken by a suitably qualified ecologist with sufficient habitat retained to ensure birds are not disturbed until nesting activity has ceased. This approach is detailed further in the accompanying Ecological Appraisal.
- 7.27 The Site is also considered likely to only support very low numbers of reptiles and is considered unlikely to be of significant local value to reptiles. However, it will still be necessary to protect any reptiles found during construction which will need to be translocated to a receptor area. The creation of new habitats as part of landscaping proposals will mean enhanced opportunities for the proliferation of reptiles. This is outlined further in the accompanying Reptile Survey Report.

- 7.28 There is a low population of Great Crested Newts within a pond 75m to the east of the Site. From there individual or very low numbers of Great Crested Newts may travel on to the Site during their terrestrial phases. It will therefore be necessary to remove and exclude any Great Crested Newts from the Site prior to and during construction works and subsequently provide replacement habitat within the landscape scheme of the Proposed Development to protect the long-term favourable conservation status of the local population. Such works will be carried out under a Natural England European Protected Species (EPS) licence as set out in the accompanying Great Crested Newt Survey Report.
- 7.29 The measures described to protect particular species in addition to a variety of enhancement measures such as strengthening native species, including habitats of high nature conservation interest in public open spaces, incorporating nectar and pollen rich plant species, removing invasive species, providing bird and bat boxes, log piles and wildlife friendly waterbodies, will mean the Proposed Development provides a net biodiversity gain in accordance with Policy CS11 and protects the SPA in accordance with Policy DM24.

Landscaping

- 7.30 The accompanying landscaping proposals have been prepared to take account of a wide range of factors including the existing trees on the Site and proximity to a SINC so as to provide a landscaping proposal that is in keeping with local context whilst delivering a number of enhancement including opportunities for increasing biodiversity.
- 7.31 In particular, having heard the concerns of local residents through the pre-application engagement process a number of landscaping treatments will be made along the Site's boundaries. The existing conifer trees along the western boundary of the Site will be removed and replaced with more appropriate native replacement planting at lower level to ensure privacy and reduce impact. The residents of existing properties that back on to these trees had mixed views regarding the removal of the conifer trees with a small majority supporting their removal but a significant proportion preferring their retention. However, on balance the removal of the conifers will bring a number of benefits in addition to the opportunity to utilise native planting. These include improving levels of light reaching the gardens of existing neighbouring properties and evidence of poor health during arboricultural surveying with a consequential risk of tree or branch falls in high winds.
- 7.32 To help demarcate new and existing dwellings a new fence will be installed along the Site's western and southern boundaries and this will be incorporated with further lower level planting of shrubs and climbing planters to again reduce massing and enhance privacy. It has been noted that because the Site is adjacent to a golf course; occasionally stray golf balls can come on to the Site. The planting on the Site's eastern boundary has therefore been reinforced with taller shrubbery to prevent this. The addition of new legacy tree planting will supplement the significant number of trees that are being retained on the Site. Amendments

Access and Highways

- 7.33 Following pre-application advice from officers and engagement with local residents, a traffic count was undertaken to assess existing and proposed traffic generation and implications on the extent of rat-running along Cherry Tree Avenue. This was to determine whether it was appropriate to provide a build-out at the junction of Padnell Road and Cherry Tree Gardens to prevent traffic from the development turning right.
- 7.34 Following a review of the traffic count information it was concluded that a build-out was not necessary. The extent of traffic generation traveling south was not considered to be significant enough to have an adverse impact on highway safety such that a build-out was necessary.
- 7.35 More information is provided within the accompanying Transport Assessment.
- 7.36 The Proposed Development will utilise the existing access onto Padnell Road as required in the allocation's specific development requirements. The northern extent of the access will remain in its current alignment to ensure no adverse impact on the existing trees within Padnell Cuts Wood.
- 7.37 The existing access will be widened from 3.5m to 4.8m to reflect the design principles of Manual for Streets before narrowing in residential zones. A 2m wide footway will flank either side of the main roads throughout the Site and shared surfaces in residential cul-de-sacs will adopt 'home zone' principles. Through these the Proposed Development will create a low speed and attractive environment for all road and pedestrian that accords with Policy CS20.

Parking

- 7.38 The Proposed Development will provide 197 parking spaces. This includes 164 allocated resident spaces, 15 unallocated spaces to serve the flats and 18 visitor spaces. It is proposed that the parking for the affordable flats will be shared spaces. Visitor spaces will be provided in convenient locations across the Site.
- 7.39 The accompanying Transport Statement provides more detail on parking and traffic generation with specific parking locations identified on the accompanying Parking Plan. Based on these it is considered that the parking provision included in the Proposed Development is compliant with Policies CS20 and DM13 and the Residential Parking and Cycle Provision SPD.

Public Open Space

- 7.40 The Proposed Development will provide new areas of public open space around the retained trees that are protected by TPOs and in the north-east corner of the Site. These spaces help to diversify the Site by juxtaposing built form with natural, greenspace. They will also help to increase biodiversity across the Site and fulfil the requirements of Policy CS13.
- 7.41 The Site also benefits from the close proximity, circa 500m walking distance, of the playing fields and children's playground that form part of the wider setting to the

Cowplain Activity Centre. This, combined with the on-site open space, will allow future residents to enjoy time outside and its associated health benefits.

Noise

- 7.42 Given the Site's proximity to the A3(M) a Stage 1 Risk Assessment for noise was undertaken. This Assessment found that the ambient noise climate at the Site is predominantly the result of road traffic noise on the A3(M) with cars only passing by occasionally on Cherry Tree Avenue and the existing residential properties providing building mass screening.
- 7.43 Manual measurements taken as part of the Assessment found that noise levels do not vary significantly across the Site. The noise levels in the table below are therefore, deemed to be representative of the Site's existing noise climate as a whole.
- 7.44 Based on these noise levels the Assessment concluded the Site is a negligible to low risk area, tending towards negligible risk, as defined in the Professional Practice Guidance on Planning and Noise published by the Institute of Acoustics. As such the Guidance recommends the Site is acceptable for residential development from a noise perspective and therefore a Stage 2 Acoustic Design Statement is not considered to be necessary. The Proposed Development therefore meets the requirements of Policy DM18.

Surface Water and Drainage

- 7.45 The Site is located in Flood Zone 1 and is therefore considered at low risk from fluvial and tidal flooding. Any risk of flooding on the Site is therefore likely to be the result of surface water and overland flow mainly coming as runoff from surrounding elevated land and highway corridors.
- 7.46 The Proposed Development will use a combination of traditional piped drainage systems and Sustainable Drainage Systems (SuDS). Surface water run-off from the Proposed Development will be discharged to the north of the Site using this combination with the SuDS features ensuring flood water will be safely contained within the Site's boundaries up to and including the 1 in 100 year event plus 40% climate change.
- 7.47 In the event the proposed surface water drainage network is exceeded, the excess water will follow the topography of the ground and flow overland towards the northern boundary and into the ditch at unrestricted rate, leaving properties unaffected.
- 7.48 The foul sewers that will serve the Proposed Development will connect to the existing foul sewer in Cherry Tree Avenue.
- 7.49 It is therefore considered the Proposed Development can be undertaken without increasing the risk of flooding to downstream and surrounding properties and complies with Policy CS15

Minerals Safeguarding

- 7.50 The Site lies within a Mineral Consultation Area for brick-making clay resources meaning that the Council will need to consult the Mineral Planning Authority on the Proposed Development.
- 7.51 As the Site lies within a Minerals Consultation Area, it is appropriate to consider the opportunities for prior extraction, in accordance with Policy 15 of the Hampshire Minerals and Waste Plan. However, it is also pertinent that the Site lies immediately adjacent to a number of residential properties on Padnell Road and Cherry Tree Avenue with further residential properties beyond on Greenfield Rise and Greenfield Crescent.
- 7.52 Within the context of Policy 10 of the Hampshire Minerals and Waste Plan, paragraph 5.15 states *"It is standard practice in Hampshire for operational mineral extraction and inert waste recycling sites to have a minimum buffer zone of 100 metres, where appropriate, from the nearest sensitive human receptors, such as homes and schools"*.
- 7.53 Therefore it can be concluded that while the site lies within a Minerals Consultation Area, prior extraction would not be appropriate in accordance with Policy 10 as it would potentially give rise to unacceptable impacts on health and safety and amenity, given the Site's location immediately adjacent to existing residential properties.

Community Infrastructure Levy (CIL)

- 7.54 The Council adopted its CIL Charging Schedule in 2013. The Charging Schedule included a charge for residential development of £100 per sqm for schemes in Emsworth and Hayling Island and £80 per sqm for schemes in the rest of the Borough. The Site falls within the area covered by the latter of these meaning a CIL charge is due albeit as a result of indexation to 2019 this charge now stands at £111.79 per sqm.
- 7.55 Information regarding the liability of the Proposed Development for CIL is set out in the CIL forms that accompany this application. The Proposed Development includes affordable housing units which can receive relief from CIL.

Vacant Building Credit

- 7.56 The Vacant Building Credit is applicable to the Proposed Development as it will bring a vacant brownfield site back into active use. The existing buildings on the Site have a gross floorspace of 522 sqm and as such this quantum of floorspace can be used as a credit against the provision of affordable housing.
- 7.57 Further information on how the Vacant Building Credit has been applied to the Proposed Development and its affordable housing provision can be found in Section 8.

8. Housing Mix and Affordable Housing

Housing Mix

- 8.1 The Proposed Development will provide 86 new dwellings. The exact mix and tenure of the proposed dwellings is set out in the table below.

House Type	Tenure			Total
	Market	Affordable Rent	Shared Ownership	
1B Flat	0	7	0	7
2B Flat	0	6	0	6
1B House	0	2	0	2
2B House	6	0	7	13
3B House	38	1	1	40
4B House	17	0	1	18
Total	61	16	9	86

- 8.3 This is considered to be an appropriate quantum of housing given the size of the Site, its opportunities and constraints, the context of the surrounding area and its access to local facilities.

Affordable Housing

- 8.4 As part of the Proposed Development, 25 of the 86 new dwellings will be affordable units. This equates to 29.1% affordable provision and would be marginally below the affordable housing requirement of 30-40% set out in Policy CS9. However, as the Proposed Development would be reutilising a brownfield site containing vacant buildings, the Vacant Building Credit is applicable on the affordable housing provision as set out in paragraph 021 of the Planning Practice Guidance on Planning Obligations (Reference ID: 23b-021-20160519). The gross floorspace of the vacant buildings on the Site is 522 sqm and the gross floorspace of the Proposed Development is 7,483 sqm meaning that the Proposed Development would only be required to make provision for 27.9% affordable housing on the Site. This would equate to 24 affordable units and as such it is considered the Proposed Development is providing more affordable units than what is required and therefore it is not necessary for any partial unit payment to be made on the Proposed Development's 29.1% affordable housing provision.

- 8.5 Of the 25 affordable units, 16 will be for affordable rent and 9 for shared ownership providing a tenure split of 64% affordable rent and 36% shared ownership. This is in general conformity with the requirements paragraph 6.20 of the Havant Borough Local Plan (Core Strategy). The affordable units form three small clusters spread out across the Site with no visible differentiation from the surrounding market housing. As such the Proposed Development will ensure the provision of a mixed community and fulfils the requirements of Policy CS9.

9. Obligations Statement

- 9.1 As advised in Paragraph 54 of the NPPF, planning obligations are one means of making development acceptable, but should be used only where it is not possible to address unacceptable impacts through a planning condition.
- 9.2 Paragraph 56 of the NPPF states that planning obligations should only be sought where they meet all of the following tests:
- *“Necessary to make the development acceptable in planning terms;*
 - *Directly related to the development; and*
 - *Fairly and reasonable related in scale and kind to the development”.*
- 9.3 These tests mirror those set out at Regulation 122 of the Community Infrastructure Levy Regulation 2010 (as amended).
- 9.4 In light of the above, the applicants are proposing that S.106 Heads of Terms would relate to the following:
- Affordable Housing;
 - Solent Recreation Mitigation Strategy;
 - Other Financial Contributions.
- 9.5 The approach to each of these is set out below.

Affordable Housing

- 9.6 The Proposed Development will provide 86 dwellings, of which 25 will be affordable. Taking account the Vacant Building Credit that is available from reutilising the Site this represents a policy compliant level of affordable housing.
- 9.7 The mix and tenure of these 25 affordable units will be provided as per the table below.

Tenure	Unit Type						Total
	1B Flat	1B House	2B Flat	2B House	3B House	4B House	
Affordable Rent	7	2	6	0	1	0	16
Shared Ownership	0	0	0	7	1	1	9

Total	7	2	6	7	2	1	25
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Solent Recreation Mitigation Strategy

- 9.8 In preparing the planning application for the Proposed Development due consideration has been given to the potential for likely significant effects on the Chichester and Langstone Harbour SPA as a result of increased recreational pressure since part of the Site lies within the 5.6 km Impact Risk Zone.
- 9.9 Although the Proposed Development is unlikely to impact on the SPA's habitats directly there may be the potential for additional recreational pressure. Any additional recreational pressure arising from the Proposed Development would not be expected to result in a significant effect on the SPA in isolation, albeit to avoid risk of any cumulative effect on the SPA a financial contribution to the Solent Recreation Mitigation Strategy will be required.

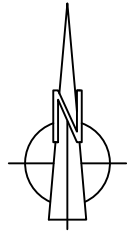
Other Financial Contributions

- 9.10 During the application process should it be found that financial contributions are necessary for identified purposes to make the application acceptable in planning terms in accordance with Policy CS21, these will be negotiated with the Council and the relevant stakeholders on a case by case basis.

10. Conclusion

- 10.1 This Planning Statement supports the submission of a planning application seeking permission for the demolition of the existing buildings and the erection of 86 new dwellings at Padnell Grange in Cowplain. It, along with the wider suite of application documents submitted to the Council for approval, demonstrate that the Proposed Development would deliver significant benefits to the Borough that are in conformity with national policy, the Development Plan and other supplementary guidance. These benefits include:
- The provision of 86 dwellings, including 25 affordable dwellings, for a Borough which currently cannot demonstrate a five year supply of housing land;
 - Future occupiers will bring additional money into the local economy through local spending and the Council will benefit from additional Council Tax revenues and New Homes Bonus receipts;
 - Improvements to the boundary treatments between existing properties and the Site; and
 - Installation of additional tree planting meaning there will be a net increase in the number of trees on the Site.
- 10.2 The Proposed Development will deliver a significant quantity of new homes on a Site that the Council has identified as being appropriate for residential development and allocated it as such in its Local Plan. It will help secure a long-term future for a currently underutilised Site and add to the vitality of the local area.
- 10.3 The Proposed Development has been carefully designed to deliver a high quality scheme that best utilises the Site whilst being sympathetic to its surroundings and taking account of existing constraints.
- 10.4 Overall, it is concluded that this planning application provides a compelling case for the grant of planning permission.

Appendix 1: Location Plan



NOTES

This drawing is the copyright of Thrive Ltd ©. All rights reserved.
Ordnance Survey Data © Crown Copyright. All rights reserved.
Licence No. 100007359. DO NOT scale from this drawing.
Contractors, Sub Contractors and Suppliers are to check all relevant dimensions and levels of the site and building before commencing any shop drawings or building work. Any discrepancies should be recorded to the Architect.
Where applicable this drawing is to be read in conjunction with the Consultants' drawings.

REV	DESCRIPTION	DATE	AUTH	CHK'D
A	Issued for Planning	29.01.19	MK	



KEY:
Application Red Line



PLANNING



architects

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PROJECT

Padnell Grange

Cowplain

For: Bellway Homes Ltd (Wessex) & The Borrow Foundation Ltd.

DRAWING

Location Plan

SCALE	DATE	AUTHOR	CHK'D
1:1250 @ A3	Nov 2018	brd	
JOB NO.	DRAWING NO.	REV	
BELL170217	LP-01	A	

CLIENT REF.

**Appendix 2: Representations Made to
Consultation on Draft Version of
Havant Borough Local Plan 2036
(Regulation 18)**

12 February 2018

Delivered by email and post

Ref: BELW3005

Local Plan Consultation
Planning Services
Havant Borough Council
Civic Centre Way
Havant
PO9 2AX

Dear Sir/Madam

DRAFT HAVANT BOROUGH LOCAL PLAN 2036

Please find set out below representations to the Draft Havant Borough Local Plan submitted on behalf of my client, Bellway Homes Wessex Ltd, and specifically in respect of Policy H46 of the Plan. This policy allocates land at Padnell Grange for residential development of 85 dwellings.

My client supports the principle of the allocation. The site represents a logical and sustainable extension to the settlement Waterlooville. It carries forward the allocation (Policy W126) from the adopted Havant Borough Local Plan Allocations adopted in 2014.

However, my client objects to the inclusion of criteria (b) within Policy H46. This states that :

“Efforts are made to retain and adapt historic buildings on the site, in particular Padnell Grange and the cottage/office in the farmyard group.”

This reference is not included in the existing adopted allocation (Policy W126), and there is no evidence provided to justify this requirement either in the Plan or in any background information.

Policy H46 (a) makes reference to the submission of a Heritage Statement in support of any application. This is considered more than reasonable to ensure appropriate assessment of the existing buildings on site to confirm whether they are of any heritage interest. However, the inclusion of criteria (b) implies that a detailed assessment has already been undertaken by the Council, and concluded that ‘efforts to retain and adapt’ at least two of the buildings should be made.

My client is unaware of any such comprehensive Heritage Assessment being undertaken by the Council. Indeed, what limited analysis has been undertaken through background work to the Draft Plan is contained within the document ‘Summary of Site Screening Work (December 2017)’. This draws together screening work undertaken for the key sites and individual site allocations within the Havant Borough

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Local Plan 2036 (HBLP 2036). It summarises the key points which have informed the developer requirements within the site allocations. It includes an analysis of Padnell Grange and mentions that there are 'no known historic asset issues'.

In addition, the December 2017 Strategic Housing Land Availability Assessment, also assesses the site and the relevant 'constraints, potential Impacts, and other considerations'. This does not include any reference to the heritage value of the existing buildings.

By contrast my client, as part of background work on preparing a future application, has appointed a heritage consultant (Pegasus Group) to undertake a Built Heritage Assessment of the existing buildings on the site. This was informed by a site visit, including an internal inspection of all buildings, and an analysis of key historical sources of information. The Assessment is appended to these representations for information.

The Assessment concludes that :

- None of the buildings within the site are statutory Listed, nor are they classified as 'locally listed' by Havant Borough Council ;
- All but one of the buildings are of little architectural or historic value, and are not considered to be commensurate with the heritage significance of a non-designated heritage asset;
- This includes Padnell Grange and the cottage/office in the farmyard group (Building 1 and 3 respectively in the Assessment), identified specifically in Policy H46 criteria (b); and
- Only Building 5 is considered a non-designated heritage asset of minor local value, and demolition should be considered in a balanced judgement against the public benefits of the proposed scheme in accordance with paragraph 135 of the NPPF.

In addition, even if there were some heritage interest in any of the buildings (which my client considers is limited as per the above Assessment), there is no analysis of the structural soundness of the buildings to accommodate any conversion, nor are the likely costs of converting the buildings taken into account. Both factors may represent insurmountable constraints in retaining and adapting the existing buildings.

Although not contended by the Council, the Assessment also confirms that the grounds of Padnell Grange are not considered to be of any particular historic, evidential or aesthetic value, and not commensurate with the heritage significance of a non-heritage asset. Equally, any below ground remains of the former brick and tile works are also not considered to be of any particular heritage value.

Given the above, my client would urge the Council to delete criteria (b) of Policy H46. The policy is not supported by any assessment of heritage value, is unjustified and unnecessary. The requirement to submit a Heritage Statement in support of any application provides the necessary mechanism for assessing the heritage value of the existing buildings.

In any case, the Heritage Assessment included with these representations concludes that, with the exception of one building, the remainder of the buildings are not commensurate with the heritage significance of a non-designated asset. The demolition of this building should be assessed against the balanced judgement set out within paragraph 135 of the NPPF.

In addition, it is also considered appropriate to extend the policy boundary of the site allocation to include the small triangle of land to the north-east (see attached Plan). This land is currently an extension of the grass parkland area that covers the majority of the grounds. Physically and visually it relates to the rest of the Padnell Grange grounds.

The boundary as shown currently extends east-west across this grassed area. It does not follow any physical or site features. A more logical and defensible boundary can be provided by extending the site allocation to include the additional area as shown. The existing woodland to the north-east (Padnell Cuts Wood) and mature deciduous hedging to the east, provide a high level of physical and visual containment. These features provide a more logical separation of the allocation from the wider countryside and golf course to the east.

It is recognised that the adjacent Padnell Cuts Wood is a Site of Importance of Nature Conservation. However, the extension of the residential allocation into this area does not necessarily mean that housing would be permitted in this location. The relationship with the woodland and need for any mitigation/buffers is a matter that can be determined through any subsequent application and assessed through other relevant policies of the Plan.

I would be grateful if you could take the above into account in further consideration of Policy H46.

In the meantime if you have any queries please do not hesitate to contact me.

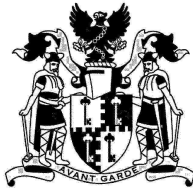
Yours sincerely



Simon Packer
Director

simon.packer@turley.co.uk

Appendix 3: Pre-Application Advice from the Council



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BOROUGH COUNCIL

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David Ramsay
Latimer House
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Southampton
SO15 2BH

Our Ref: GEN/17/01194
Direct Line: (023) 9244 6549
Ask For: Mr D Eaves
Email: planning.development@havant.gov.uk

08 November 2017

Site Location: Padnell Grange, Padnell Road, Waterlooville, PO8 8ED

Re: Redevelopment of Padnell Grange with 84 residential dwellings.

Dear Mr Ramsay

I am writing to you further to your enquiry received on the 3rd October and to our meeting of the 4th October 2017 regarding the above address. I have now received back a number of consultation responses and visited the site with the Councils Conservation Consultant and Arboriculturalist and would provide the following feedback. Copies of some consultation responses received have already been forwarded to you and any further responses will be sent separately.

The Padnell Grange site is allocated for Housing under policy WA1 (Waterlooville Housing Allocations) of the Havant Borough Local Plan (Allocations) 2014. Policy W126 specifically considers the site itself confirming that the allocated site area is 2.55ha and indicating that the site is indicatively suitable for the provision of 84 dwellings, based on known site characteristics and density considerations. Policy WA1 advises that *"Planning permission will be granted provided that detailed proposals:*

- 1. Are broadly consistent with the indicative provision for the number of dwellings.*
- 2. Take account of all the site specific development requirements set out in the relevant site profile."*

I can therefore confirm that the allocated site remains suitable for residential development in principle. However it is noted that the site boundary shown on the Indicative Layout Drawings No. SKL-01 Rev B and SKL-02 includes land outside the allocation and outside the designated built up area boundary (north east corner of the site). Its development would conflict with the development plan and would therefore need to be advertised as a departure. This will be a material consideration in relation to any application and the relationship to the adjacent golf course and woods must be carefully considered, taking into account their SINC status.

Turning to more detailed consideration of your proposals, the submitted details are relatively limited and include no design/elevational details, therefore the response below and consultation responses received are limited to responding to the information available at this stage. I understand that drawing SKL-01 Rev B is the preferred layout and I shall primarily comment on this layout below.

On the basis of this information currently available, the main issues in relation to the proposed development of Padnell Grange are considered to be as follows:

1. Housing Matters
2. Urban Design Issues (including consideration of existing buildings)
3. Impact on Neighbouring uses
4. Trees/landscape/impacts on woodland
5. Highways Matters
6. Affordable Housing
7. Public Open Space
8. Flood Risk/Drainage
9. Nature Conservation
10. Archaeology
11. Efficient Use of Resources
12. Contamination
13. Crime & Disorder/Fire Service comments
14. Minerals
15. Education
16. Developer Contributions/CIL

1. Housing Matters

Housing applications are assessed against policy CS9 of Havant Borough Core Strategy 2011. Under policy CS9, development should (amongst other matters):

- *Deliver 30-40% affordable housing and avoid concentrations of affordable housing (discussed under 6 below);*
- *Achieve a suitable density of development for the location taking into account accessibility;*
- *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*

The current proposal based on your calculation of the larger than allocation site area of 2.79ha and with the provision of 84 dwellings (SKL-01 rev B) would provide a density of approximately 30.1dph.

Using the site allocation area and excluding the part of the site in the north-east corner the site area would be as shown in the allocation 2.55ha with the provision of 84 dwellings this would provide a density of 33.7dph. The indicative allocation would provide a density of 32.9dph.

It is considered that the density of development proposed is sufficiently close to the indicative allocation to be acceptable in principle, however there are a number of issues identified below that mean that to achieve this density with the layout and house types currently proposed will result in an unacceptable urban design quality for the development.

I note that the Indicative Layout Drawing No. SKL-01 Rev B indicates that the development will provide detached, semi-detached, terraced dwellings and flats with 1, 2, 3 and 4 bedrooms. The range of dwelling types appears to meet the requirements of a mixed development and further details in relation to tenures should be included with any planning application.

2. Urban Design Issues on site (including consideration of existing buildings)

In relation to urban design, I have not received elevations of the proposed units and my comments are therefore limited to the layout shown.

The application would be assessed in relation to the Council's Borough Design Guide SPD which can be viewed via the following link:

<http://www.havant.gov.uk/sites/default/files/documents/SPD%20Borough%20Design%20Guide.pdf>

I would recommend that any development uses this document to inform the layout and form of the proposals and that the Design and Access Statement also demonstrates how this document's guidance has been considered.

At this initial stage however I am concerned that there appears to have been insufficient analysis of context in devising your proposals - we would normally expect that developers should analyse the character of the site and its context to identify positive and negative elements which will influence and inform the overall design and orientation of buildings and spaces. In this regard the Council's Conservation Consultant has visited the site and provided a detailed assessment of the existing buildings and this will be forwarded to you (together with other consultation responses not already provided).

Having visited the site with the Conservation Consultant it is considered that Padnell Grange itself in a stripped down form with more modern additions removed is clearly a building of some merit and architectural historic interest. It is set on an elevated part of the site with attractive landscaping around it. This building has a high potential to be converted for residential use and to form the centre focal point of any new development with the landscaped setting providing an attractive area of amenity space - such an approach would improve the legibility of the site and help develop a clear sense of identity for the development. A residential re-use of the building is therefore strongly encouraged. In addition further consideration should be given to the possible re-use of the Cottage/office forming part of the farmyard group. It would appear that drawing No. SKL-02 retains the Padnell Grange Main Building itself, although at our meeting it was clear that this was not the preferred scheme.

Any application should include a detailed Heritage Statement to assess the merits of the historic buildings on the site in detail and archaeological potential (see 10 below).

In terms of specific distance guidance the Design Guide provides the following requirements:

- back to back separation of a minimum of 20m;
- back to back separation of a minimum of 24m required where the relationship is between 2 and 3 storey units;
- Where a dwelling faces a blank gable, 10 metres separation distance is required;
- Garden lengths should normally allow 10 metres.

From an initial assessment of the layout I would raise the following concerns:

Back to back separation distances do not appear to be met between units 52-54 and units 72-74

Units 16-21 are short of standard 10m garden depth.

Unit 54 short of standard 10m garden depth.

I am not clear in relation to the height of the flat units and the relationships between these and neighbouring units which should be assessed against the design guidance.

Some of the properties are set close to the road frontage and directly face other properties for example units 72-73 to 14-15 and flats to unit 16. This can result in an unattractive streetscene and an overbearing relationship between units.

It is also necessary to consider the impact of retained trees on the amenities of residents, including in relation to light, overbearing impact and future resident pressure and these issues are considered further in part 4 below.

These issues suggest that amended layout and a reduction in units or different dwelling types is likely to be required in order to achieve acceptable relationships between dwellings and amenity spaces.

In terms of more general comments it will be necessary to design units 9, 16, 22, 23, 44, 49 and 81 such that they address both roads. These units should be designed to essentially have two frontages.

Car parking should avoid over dominance within street scenes and in this regard I am concerned at the extent of grouped out of curtilage car parking. In particular the areas close to units 26-29, 16-21, 44-48 and to the rear of the flats appear particularly car dominated. The layout should clearly allocate parking to units in a logical way in order to be legible and easily accessible to the related unit. It is considered that wherever possible car parking should be provided in curtilage. Where this is not possible the parking should be broken up with landscaping, changes to materials etc. Further guidance on car parking design is provided in Havant Borough Design Guide SPD 2011 and within Havant Borough Council Parking SPD 2016.

Car and cycle parking will be required to meet the Councils Parking SPD which can be viewed on the Councils website at the following address:

<http://www.havant.gov.uk/sites/default/files/documents/Final%20Parking%20SPD.pdf>

I am also aware that there are significant changes in levels within the site, these will need to be carefully considered and worked with to prevent inappropriate relationships between buildings.

It is also noted that there are apparent spring lines within the site close to the significant line of trees crossing the north-west part of the site, these features need to be accommodated within the open space on the site.

There is a current right of way that crosses the site (Route no. 127). The route has not been clearly defined through the site and the current layout would put users onto the highway which is deemed not acceptable. At present route 127 is an off road path footpath that connects Sheepwash Road (a public bridleway) to the wider landscape to the south. We need to see an off road shared footpath that is 3m wide, hard surfaced and well lit to encourage sustainable transportation. This footpath is well used by dog walkers, cyclists and walkers and this is an excellent opportunity to enhance this important landscape link. Furthermore any alterations to the PROW should be done in accordance with HCC 'landowners guide to public rights of way'. The diversion of PROW can be a complex and time consuming process and the requirements should be addressed as early as possible in the development process in order to seek to avoid delays at a later stage.

Further comments in relation to the PROW routes are provided by HCC Countryside Access Officer who objects to the proposed layouts in their current form. These comments will be forwarded to you for consideration.

There are concerns with the private road which is the access/egress route for properties 44-48 and 78 – 84. The current layout could create a conflict with owners of the properties and the people accessing route 127 and Sheepwash Road.

The current site layout has properties on the west of the site who's rear gardens abut to existing mature native hedgerow/trees. This layout will create a sense of perceived ownership of the hedgerow and trees which will jeopardise this important green corridor that connects habitats from north to south. This is not acceptable and needs to be amended with the hedge forming part of the common parts management area.

The current landscape vernacular of adjoining roads consists of tree lined avenues and any landscape strategy should continue this design.

Proposed tree planting on site should consist of legacy tree species such as Oak, and any properties within in the vicinity of the legacy trees should have foundations to accommodate mature tree roots.

3. Impact on Neighbouring uses

The site backs onto existing residential development on the western and southern sides, and these again form part of the context of the site which needs to be respected and addressed if a high quality urban design is to be achieved. The properties backing onto the site are mainly semi-detached bungalows and to the south semi-detached two storey houses. The relationship between the proposed development and the existing residential development beyond the site will be given detailed consideration at the application stage and in general terms considered against the Council's design guidance in relation to separation distances; however there are issues apparent from the proposed site layout which I would raise at this stage.

As stated in 2 above there are minimum separation distances to be considered, it should also be noted that the site has varying ground levels and changes in levels can result in the need for minimum distances to be increased. A number of the properties in Cherry Tree Avenue have short rear gardens, this coupled with their bungalow design makes these properties particularly vulnerable to overlooking and overbearing impacts from two storey and more bulky development. Particular pinch points are

Unit 34 to No.154 Cherry Tree Avenue (two storey to single storey set approx 22m off 24 required).

Unit 33 to 164 Cherry Tree Avenue (two storey to single storey set approx 23.5m off 24 required).

Unit 26 to 172 Cherry Tree Avenue (two storey to single storey set off approx 16m off suggest hipped roof form to reduce impact)

Unit 1 to 190-192 Cherry Tree Avenue (two storey to single storey retention of boundary screening important)

In relation to the boundary with the golf course, it is considered important to seek to soften the transition between the new development and the non-urban environment beyond as far as possible by setting the development off the boundary and minimising the height and bulk of the western dwellings. Units 79, 80 and 84 are set in close proximity to this boundary at two storey height (there are other concerns in relation to these units highlighted in 4 below).

The position of any SUDS features and pumping stations would need to be carefully considered in relation to trees and dwellings and could impact on the overall layout.

4. Trees/landscape/impacts on woodland

The landscape team have provided the following comment in relation to trees and proposed development in proximity.

The existing landscape is made up of large mature trees a number of which are designated as TPO points and groups. Whilst a tree survey has been carried out the tree protection plan is deemed to have too much construction occurring within the RPA of the protected trees. As such further clarification of construction detail for foundations and hard surfacing is required to understand what the impact the construction process will be on the root systems.

The Councils Arboricultural Officer has visited the site and provided detailed comments which will be forwarded to you. In terms of the site layout the following comments have been made:

Units 76, 77 and 81 in the northern corner of the site would be directly affected by the adjacent trees and the relationship is considered too close.

Units 3, 5, 22 and 23 to the western aspect of the site are adjacent to large oaks and again the relationship between the trees and proposed dwellings is considered too close.

The units identified (if built) are likely to place excessive pressure on the adjacent trees which may result in applications to excessively prune the trees or to remove them.

Any formal application will be required to provide a detailed updated arboricultural impact assessment including arboricultural method statement with appropriate mitigation.

5. Highways Matters / Accessibility

Any application will need to be accompanied by a Transport Assessment making particular reference to the local footpath and rights of way network. The Assessment should look at the highway network leading to and from the site to demonstrate the impacts of the development.

The Councils Development Engineer has provided comments in relation to the potential impact on Cherry Tree Avenue stating:

Future residents of the development wishing to access/egress the A3M for journeys to north or south may chose to use Junction 3 Hulbert Road Roundabout by using Cherry Tree Avenue. The developer should investigate ways of discouraging the use of this difficult route due to its geometry, number of side junctions and parked cars.

Any application will also need to be accompanied by a Travel Plan which sets out strategies for reducing reliance on the private car.

The roads shown in the layout indicate a different hierarchy of roads. It is not clear whether the main routes are intended for formal adoption, however roads will be required to meet adoptable standards in terms of their design, construction and lighting (subject to ecological considerations).

Tracking should be provided to demonstrate that fire service and waste collection vehicles can access the site and serve the residential properties.

Further comments in relation to the PROW and cycle links are also provided and should be assessed with the comments on routes provided above.

Car and cycle parking would need to conform to the Councils adopted standards as set out in Councils Parking SPD.

As set out above I have design concerns in relation to the out of curtilage car parking proposed.

6. Affordable Housing

This proposal would need to comply with Core Strategy policy CS9. 2 and provide 30-40% affordable housing on-site; this would equate to a minimum of 25.2 units (albeit based on the larger-than-allocated site of 84 units). 25 would be expected to be provided on site with the additional 0.2 of a unit calculated as a financial contribution. A tenure split of around 70/30 Affordable Rented/Shared Ownership is expected. The units would be required to be delivered in a variety of types, sizes and tenures to meet local need. The eventual tenure mix can be agreed with the LPA once the application proceeds; however I would expect the application to be supported by an affordable housing statement.

The Councils Housing Officer comments that:

I note that the applicants has provided 2 potential layout options with different affordable housing provision in terms of type and mix. My initial response to these is that Sketch 2 provides a better mix of unit size and will therefore meet the current housing needs of the Borough better. However I would like to see a small number of 4 bedroom units included.

It is important to ensure that the affordable housing provision is tenure blind in terms of its design and layout.

The site has the potential to deliver much needed affordable housing in a good location. The affordable housing requirements would need to be secured through a S106 agreement.

7. Public Open Space

The development should look to secure areas of informal open space around existing features (for example existing mature trees, spring lines and the setting of Padnell Grange). On site provision for a local area of play and its maintenance is encouraged. All areas of open space should be overlooked and provide an attractive setting for the residential properties fronting them whilst being designed to reduce the potential for anti-social behaviour and crime.

8. Flood Risk / Drainage

Surface Water Drainage:

The site lies within Flood Zone 1 which indicates a low probability of flooding from rivers or the sea. It is however noted that the site does appear to incorporate springs and local hydrology would need careful consideration to ensure that impacts on the development and the water environment are properly assessed and mitigated.

The site is located in a Source Protection Zone SPZ1c. Portsmouth Water have made detailed comments in relation to restrictions to deep bore soakaways, piled foundations and Construction Management Plans.

Any application should include an assessment of geology and hydrogeology and solutions in relation to the water environment.

Consultation responses from the Environment Agency and Local Lead Flood Authority (LLFA) are awaited, however, it would appear that detailed work in relation to drainage proposals will need to be provided. You are advised to consult these bodies directly to take up their own pre-application paid service. This would be encouraged to help to reduce the potential for delays in the formal planning process and to ensure that the layout takes account of drainage requirements at an early stage.

As the site is over 1ha a Flood Risk Assessment would be required to be submitted.

The use of SUDs are encouraged wherever possible, however these must be appropriately designed to deal with surface water and designed as attractive features of the development providing potential biodiversity enhancements. The design and maintenance arrangements for SUDs are likely to form requirements for the S106 agreement.

Foul Drainage:

When drawing up wastewater treatment proposals for any development, the first presumption is to provide a system of foul drainage discharging into a public sewer to be treated at a public sewage treatment works (those provided and operated by the water and sewerage companies). This should be done in consultation with the sewerage company of the area prior to the submission of a formal planning application.

Southern Water have provided detailed comments and have confirmed that:

Due to the size of the development capacity assessments will be required to determine if the existing foul sewerage and surface water systems can accommodate the proposed development flows.

9. Nature Conservation

Natural England have provided a limited consultation response in relation to the development, however more detailed advice can be obtained through their charged service and this is strongly encouraged at the pre-application stage by the Local Planning Authority.

Natural England have confirmed that their comments are as submitted in relation to a previous pre-application:

The application site lies within 5.6km of Langstone Harbour Site of Special Scientific Interest (SSSI), which is also notified as Chichester and Langstone Harbours Special Protection Area (SPA) and Ramsar Site.

The proposal will lead to a net increase in residential accommodation. Natural England is aware that Havant Borough Council has recently adopted a Supplementary Planning Document (SPD) or planning policy to mitigate against adverse effects from recreational disturbance on the Solent SPA sites, as agreed by the Solent Recreation Mitigation Partnership (SRMP). Provided that the applicant complies with the SPD or policy, Natural England will be satisfied that the applicant has mitigated against the potential adverse effects of the development on the integrity of the aforementioned European site.

The Council operates a contribution payment in relation to the mitigation of recreational pressure on the SPA as set out in HBC Local Plan (Allocations) policy DM24, the contribution requirement is set out in section 16 of this letter.

A consultation response has been received from the County Ecologist in relation to more site specific considerations. The following comments have been made:

The application is accompanied by an Ecological Appraisal (HDA, August 2017) which provides details of an initial ecological assessment of the application site. The site comprises areas of species-poor grassland, herbage, scrub, scattered trees and buildings and is adjacent to woodland.

The initial assessment concludes that the site could support various protected species and a suite of further surveys have been recommended. The scope of these surveys seems appropriate and includes bats (roosting and flying), hazel dormouse, common reptiles and great crested newt. My only comment would be in relation to the potential presence of the very rare Bechstein's bat, a species known to occur within the surrounding landscape and which could feasibly be recorded on site. Survey methods would need to be suited to this species, in line with current industry best practice guidance.

I will be happy to provide comment on any future detailed survey reports. Any such reports should include specific details on recommended mitigation, compensation and enhancement measures designed to address identified impacts.

The proposals would of course require a contribution towards the Solent Recreation Mitigation partnership (SRMP).

10. Archaeology

The County Archaeologist has provided detailed requirements. Any planning application should be submitted with a Heritage Assessment which considers and scopes the archaeological requirements for the site.

11. Efficient Use of Resources

The Council would encourage the use of sustainable building techniques, water conservation and on site renewable energy. Any such measures should be integrated into the development from a design point of view.

12. Contamination

In relation to potential contamination issues the Councils Environmental Control Officer has commented as follows:

It is noted that the pre-application statement acknowledges the potential presence of interred human remains at the site, and in addition, the relevance of the site history to the consideration of Contamination. I also note that advice is not specifically sought in this regard, other than under the general heading "advice on further surveys required to support the planning application".

In this regard, and at this stage, it is sufficient to say that the presence of a degree of contamination at the property cannot be ruled out, but there are good reasons to conclude that any contamination which may be present is unlikely to be so severe, or so widespread, as to prejudice a scheme of the scale proposed. It is considered however that an intrusive investigation of soil quality will be required for this site, in line with policy DM17. I am comfortable with this being provided either with a detailed application for the site, or subsequent to consent, secured by a comprehensive suite of planning conditions requiring that will require assessment prior to commencement.

13. Crime & Disorder/Fire Service comments

Comments in relation to Crime and Disorder have been provided by the Crime Prevention Design Advisor. These comments have been forwarded and emphasise the need for routes to be overlooked and designed with public safety and security in mind. Recommendations are made in relation to the open spaces. Concerns in relation to the position of plot 79 are made. Recommendations in relation to rear garden access security measures are provided. Lighting requirements are also provided.

Any application should be accompanied by an assessment of the features incorporated to reduce the likelihood of crime and anti-social behavior.

Detailed comments have been provided by Hampshire Fire and Rescue for consideration.

14. Minerals

The site overlies identified minerals resource, and as such is in the Minerals Consultation Area for Hampshire County Council. The Hampshire Minerals & Waste Safeguarding SPD indicates that where sites overlay resource in the MCAS they need only be referred to the County Council if they have a site area of over 3ha.

It is noted however that in relation to a previous pre-application submission that County Minerals stated that they would take this early opportunity to request a mineral safeguarding assessment to be undertaken and submitted alongside submission documents. This would provide the Minerals Planning Authority with the relevant information and exploratory data required in order to establish the extent of the potential for mineral recovery in order to satisfy Policy 15 of the adopted Hampshire Minerals and Waste Plan 2013.

In the circumstances it is recommended that the County Minerals section be approached directly in relation to any requirements.

15. Education

In relation to possible education contribution requirements I shall chase a response to our consultation from County Education and forward any response received.

16. Developer Contributions/CIL

The development would be subject to the Community Infrastructure Levy. The Council's website includes a calculator which can be used for assessing likely contribution requirements (based on the floorspace of the development). The required contribution in this area is £80/sqm + indexation (currently 27.24% increasing from 1st January 2018) .

The development would also be subject to a Solent Recreation Mitigation Partnership contribution requirement - currently £210 per dwelling.

In addition, S106 requirements associated with the development are likely to include:

- Affordable Housing requirements;
- Management Plan;
- Management Company
- Highway design/maintenance plan including street lighting
- SUDS/drainage requirements
- SUDS Bond
- Public access across site
- Provision of cycle/pedestrian route PROW
- Possible Site Specific Transport Improvements
- Possible Traffic Regulation Order requirements
- Possible ecological requirements
- Possible education contribution
- Employment and Skills Plan
- SRMP contribution (currently £210/unit)
- Monitoring fees

17. Conclusion

In conclusion, whilst the general policy position is such that the development of the allocated site for residential purposes is appropriate, this is on the basis that the site area for the residential development is reduced in line with the allocated site. Any additional land inclusion would require a detailed assessment of the appropriateness of this area given the departure from the allocation and that the site is outside the built up area.

From a more detailed perspective it is clear that the proposals require a significant amount of further work to address the detailed issues highlighted above. In my view, this is likely to require a revision of the currently proposed layout and a re-evaluation of the opportunities and constraints of the site and its surroundings - both in terms of the existing buildings on the site which could be re-used to add character and a sense of place to the development, as well as the relationships to existing trees and the adjoining residential development which will be impacted upon by the proposals. Opportunities should also be taken to improve the quality of the public realm by reviewing the car parking and landscaping proposals, and improving the legibility of the site. I accept at this stage that improvements in the urban design of the development may result in a small reduction in the overall number of units achieved.

Further Public Engagement

The Council would strongly recommend that the application be subject to further public engagement at the pre-application stage. In the case of significant proposals (50+ dwellings) we would encourage you to commission and attend a 'Development Consultation Forum'. A Development Consultation Forum aims to improve Councillor, stakeholder and public involvement in the pre application process, and provides developers with a greater understanding of the community's expectations. The cost of a Development Consultation Forum is £2625. Please contact the Council if you wish to obtain further information on this matter.

This has proven to be a valuable exercise in other development proposals for all involved and can act to identify local issues and raise issues for further work/amendment prior to formal submission of a planning application.

Previous examples can be viewed here:

<https://www.havant.gov.uk/planning-and-environment/development-consultation-forums>

We would also encourage further public consultation by the developer via public exhibitions etc.

Any pre-application public engagement should be set out in a Statement of Community Involvement and submitted with the planning application.

I trust that this response will prove of use to you in developing ideas for this site further.

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

This advice also only relates to planning matters, and does not relate to any other application that may be required under the Building Regulations or under any other Act, Regulation, Byelaw or Order where the Council's approval may be needed. For further guidance as to the need for consent under the Building Regulations please phone 023 9244 6571.

Yours sincerely



Mr D Eaves
Principal Planner
Our Ref: GEN/17/01194