

Our ref: 50947/RO
Your ref: APP/21/00678

Planning Services
Havant Borough Council
Public Service Plaza
Civic Centre Road
Havant
PO9 2AX

Sent by email to: david.eaves@havant.gov.uk
planning.development@havant.gov.uk

7 December 2021

Dear David

Application for Reserved Matters Approval pursuant to Outline Planning Permission APP/19/00007 for the layout, scale, appearance and landscaping of 70 dwellings and associated works. Request for approval of details pursuant to Conditions 5 (Arboriculture); 7 (landscaping); 8 (drainage); 10 (boundary treatments); 13 (levels); 15 (highways); 17,18 and 19 (archaeology); 21 and 32 (lighting).

I write regarding the above and further to responses received from statutory consultees which require additional information and/or clarification of various issues. This letter seeks to provide a comprehensive response to these issues.

Additional Information

The additional/amended information can be downloaded here:

https://drive.google.com/drive/folders/1qXAUFZIE_OQcIIeOXOVEYnJfBw07XfD?usp=sharing

The relevant documents are listed on the attached drawing issue sheets prepared by:

- Thrive Architects
- MJA Consulting Engineers
- RPS Landscape

Planning Policy

Comments were received in a response dated 18 August 2021. The Policy Team confirms that the principle of development has been established by the outline planning permission (OPP) (ref.APP/19/00007). The comments note that the OPP relied on emerging policies in the pre-submission Local Plan, and that there is an 'expectation' that the policy requirements within it are met. Nevertheless, the policy comments also

acknowledge that the emerging Local Plan policies carry limited weight prior to adoption of the Local Plan. The recently published Inspector's Interim Findings Report on the emerging Local Plan has found the Plan unsound and consequently asks further questions of the weight to be given to the draft policies. The applicant's response to these comments is set out below:

Emerging Policy H1 Space Standards - the submitted schedule of accommodation was provided with ft² only. A revised schedule including m² is enclosed.

The emerging Local Plan requires new development to meet the enhanced M4(2) accessibility standards (30%) and M4 (3) wheelchair accessible standards (2%).

Importantly, with reference to emerging policy H1, the Local Plan Inspector commented:

"different thresholds for enhanced accessibility and adaptability standards and wheelchair accessibility standards should be considered as reasonable alternatives"

All affordable units submitted as part of the RM have been designed to meet the National Described Space Standard (NDSS) and M4(1) of Part M (Access to and use of buildings) of the Building Regulations. This equates to 30% of all new development. They do not meet the M4(2) requirements or M4(3) requirements.

The revised layout (ref.RED200818_CSL01_rev D) makes provision for sufficient private and communal amenity. Private gardens are provided for all houses. Alternative housetypes are proposed at plots #65-70 to provide maisonettes which now benefit from an area of private amenity proportionate to the accommodation, rather than a communal area.

Emerging Policy H4 Mix – this emerging policy encourages development proposals to provide a range of dwelling types and sizes.

The emerging policy goes on to state that the mix should include approximately 35% of the overall mix as 2 bed. This generates a requirement for 25 no. 2 bedroom homes. As submitted, the RM makes provision for 27%. During our (virtual) meeting, you noted that some of the proposed 2 bedroom provision included homes with a 'study' that could equally perform as an additional bedroom, thus reducing the overall provision further. This is not the case. The 'Letchworth' design includes a study that measures 7m² which does not meet the internal space standards for a bedroom (which is a minimum of 7.5m²) and therefore the housetype remains a 2 bedroom unit.

In any event, the Local Plan Inspector's recommendation to withdraw the Local Plan is a significant material consideration in the assessment of the RM.

Consequently, it is considered that the proposed RM deliver a range of dwelling types including a meaningful contribution to the provision of 2 bed homes in accordance with policy.

Emerging Policy E12 Low Carbon Design – the emerging Local Plan expects new residential development to achieve a 19% reduction in emissions. With reference to emerging policy E12, the Local Plan Inspector repeated that there are likely to be reasonable alternatives associated with the requirement for different standards.

The approved nitrate budget and mitigation commits water consumption to no more than 110L per person per day (pppd). This is secured by the approved s106.

Emerging Policy IN3 EV Charging Infrastructure – the applicant is committed to delivering electric vehicle charging points (EVCP) as required. Details will be provided at the appropriate time to address OPP Condition #22.

Emerging Policy E9 Provision of New Open Space – it is suggested that there is an under-provision of open space against a requirement of 1.5ha per 1000 population.

Policy E9 confirms that the occupancy levels set out in table 5 (modified below) should be applied.

Policy E9 goes on to seek the provision of 15m² of open space per person. Based on 170 persons, this equates to a requirement of approximately 2,550m² or 0.25ha (see below).

Beds per Dwelling	Persons per Dwelling	Total RM dwellings	Total RM persons
1	1	6	6
2	2	19	38
3	2.5	19	47.5
4+	3	26	78
		70	169.5

Emerging Policy E9: Table 5

Notwithstanding the Local Plan Inspector's recent comments relating to emerging policy E9, the RM delivers approximately 0.58ha of open space, comprising amenity grassland, SuDS and a community orchard. This is broadly consistent with the approved provision in the OPP and once again provides 'significantly above' the policy requirement. The OPP officer's report¹ confirms this approach to provision is acceptable.

Parking – a revised schedule of accommodation has been provided. This sets out the parking requirement (including visitor spaces).

Highways (& Traffic)

3m shared use path – the Highways Authority seeks provision of a 3m shared use footway/cycleway through the site, to connect committed improvements along Bartons Road.

The approved OPP access plans clearly show a proposed 3m footway/cycleway along Bartons Road frontage, connecting the entrance of the adjacent housing development to the proposed emergency access. The approved remodelling of the Crematorium access delivers a 3m shared footway/cycleway along the Bartons Road frontage. This changes to a proposed 2m footway within the site. With this plan approved at OPP there is no scope to amend the provision at the reserved matters stage. As such the reserved matters layout, reflects the approved OPP access plan.

Manual for Streets (MfS) states that cyclists should generally be accommodated on the carriageway. Further, it recommends that there should not be any need for a dedicated cycleway where traffic volumes

¹ Paragraphs 7.102 – 7.106

and speeds are low. Junction crossings and regular vehicle crossovers would also discourage cyclists from using the facility as cyclists are more likely to choose routes that enable them to keep moving.

Local Transport Note (LTN) 1/20² provides guidance to local authorities on delivering high quality, cycle infrastructure. It states that segregated cycle provision would not normally be considered for areas with a 20mph design speed and daily vehicle flows of less than 2500 vehicles.

Accordingly, it is considered that it is not reasonable to insist upon delivery of a continuous 3m shared path to connect committed improvements as part of this reserved matters. The requirement was not secured by a condition attached to the OPP, nor is it referred to within the s106.

This is discussed in more detail by a Technical Note prepared by iTransport and which is appended to this letter.

It is possible that provision could be made alongside future planning applications for housing on land to the north of this site, or as part of the emerging strategic housing allocation to the south³ subject to adoption of the emerging local plan.

Internal Road Widths – refuse vehicle tracking drawings have been updated by MJA Consulting Engineers and are submitted with this letter.

Visibility – the layout has been amended to improve the visibility for plot #37.

Attenuation Basin – It is understood that the Highways Authority has acknowledged that the location of the attenuation basin is something that can be reviewed at detailed design stage.

Visitor Parking – the layout has been amended to include 19 visitor spaces in accordance with the relevant parking standards.

Landscape

Additional boundary planting is now proposed along the Bartons Road frontage, to the south of plots #1 and #2 to allow for greater privacy for the residents living in these properties.

Additional soft landscaping is now proposed to break up the area of car parking at plots #60-64.

Some additional planting is now proposed at the Bartons Road site entrance. However, this area is out of the applicant's control and is therefore not deliverable. For the same reason, a formal link from plots #1-5, to the main entrance is not deliverable. In addition, the Crematorium is not supportive of large, legacy native trees.

The planting mix has been amended to include fewer climbing plants on boundaries, and to include plants with a lower toxicity

Housing

² July 2020

³ Emerging policy K5 Southleigh – 2100 homes

Amenity for plots #29-32 – amenity is provided surrounding the Bromsgrove block (plots #29-32). Further amenity is available between the site boundary and the parking spaces which will be looked after by a Management company. This will be available for the almost exclusive use of the residents. Residents also have access to the central open space, in front of plots #41-45 which will include play area provision.

Tenants with mobility issues – The Bromsgrove house (plots #29-32) type is not suitable for residents with mobility issues due to their bedroom and main bathroom being at 1st floor level. However, the 'Leadon' housetype (plots #65 & #69) include a ground Floor (1b2p) maisonette which would be suitable for tenants with mobility issues as facilities are all on one level.

The applicant has engaged with Julie Clark (Housing) directly. Julie has confirmed that she is happy with the details provided⁴.

Southern Water

The revised site layout plan (ref.RED200818_CSL01_rev D) has removed proposed tree planting from the foul sewer easement.

Building Control

All plots will comply with Part B of the Building Regulations.

Nitrate Neutrality

Natural England acknowledges that a nitrate budget has been agreed at the outline stage and raises no further concerns, assuming the LPA are satisfied that the reserved matters do not change the overall budget. It does note that if the design of the scheme changes, a recalculation should be undertaken and a revised Habitat Regulations Assessment (HRA) required.

The layout subject of this application for the remaining reserved matters has not deviated significantly (in nitrate terms) from the OPP. Indeed, with the reduction in the overall dwelling numbers, the nitrate load will be reduced. Nevertheless, the layout has changed and hence an updated budget will be provided in due course.

Summary

The applicant has listened and given consideration to the comments made on the submitted reserved matters. Where possible (and reasonable) additional information has been prepared which seeks to address these comments.

Some comments – including the need for a segregated footway/cycleway, and a prescribed mix of housing – are considered to be unreasonable. Nevertheless, a mix of housing is proposed. Further, opportunities to deliver a dedicated cycle line along Bartons Road corridor do exist in the local area. These can be negotiated through early engagement and secured by legal agreements as part of future planning applications.

⁴ Email from Julie Clark to Hannah Cowley (Redrow) dated 6/9/2021

We hope the above and enclosed is useful. As ever the applicant remains willing to discuss the proposals and to seek to address any reasonable concerns.

If you require further information please do not hesitate to contact me.

Yours sincerely,



RICHARD OSBORN
ASSOCIATE DIRECTOR
richardo@pro-vision.co.uk

encs.