



Our ref: HL11008
Your ref: APP/13/00266

22 October 2013

Mrs S Smith
Senior Planner
Development Control
Havant Borough Council
Public Service Plaza
Havant
PO9 2AX

Dear Sally

**HAVANT RETAIL PARK
PROPOSED RESIDENTIAL DEVELOPMENT**

You asked me to provide a summary of the policy position and traffic impacts in relation to this site. I set these out below along with, as requested, a technical response regarding the stability of the chalk face.

Planning Policy

The site is a sustainably-located brownfield site within the built-up area of Havant, with local facilities (shops and a park) within walking distance, and Havant town centre and train station a bus or cycle ride away. Given its sustainable location and brownfield status, it is the kind of site favoured by the adopted Core Strategy to help provide the new houses which the Borough needs.

Policy CS9 (bullet point 8)

Ensure housing development is delivered in a phased manner with an appropriate proportion of previously developed land so as to avoid unnecessary development on greenfield urban extension sites.

Rightly the Core Strategy prioritises brownfield over greenfield development, to avoid unnecessary development of greenfield sites. For this reason, and because of its sustainable location, the site is preferable to Goldring Close on Hayling Island; yet that site was recently granted permission at appeal because of the Council's borderline housing land supply position.

Any dip in the Council's 5-year housing land supply risks a first-come first-served approach to greenfield sites, and to avoid this the Council should take advantage of all opportunities to recycle brownfield sites. Half the site is proposed to be allocated for housing in the Allocations Plan, a reflection of the site's sustainability credentials.

Noise levels and air quality have been extensively tested as part of the design process, and it has been demonstrated that suitable living conditions can be provided for future residents.

There will be no loss of B-class employment land as a result of the development and no conflict with the Council's employment retention policies. Homebase has already closed and AMF has stated publicly that it will close shortly, independently of this planning application, because it is the wrong location for a bowling facility. Consequently there is no breach of Policy DM2 which seeks to protect community facilities.



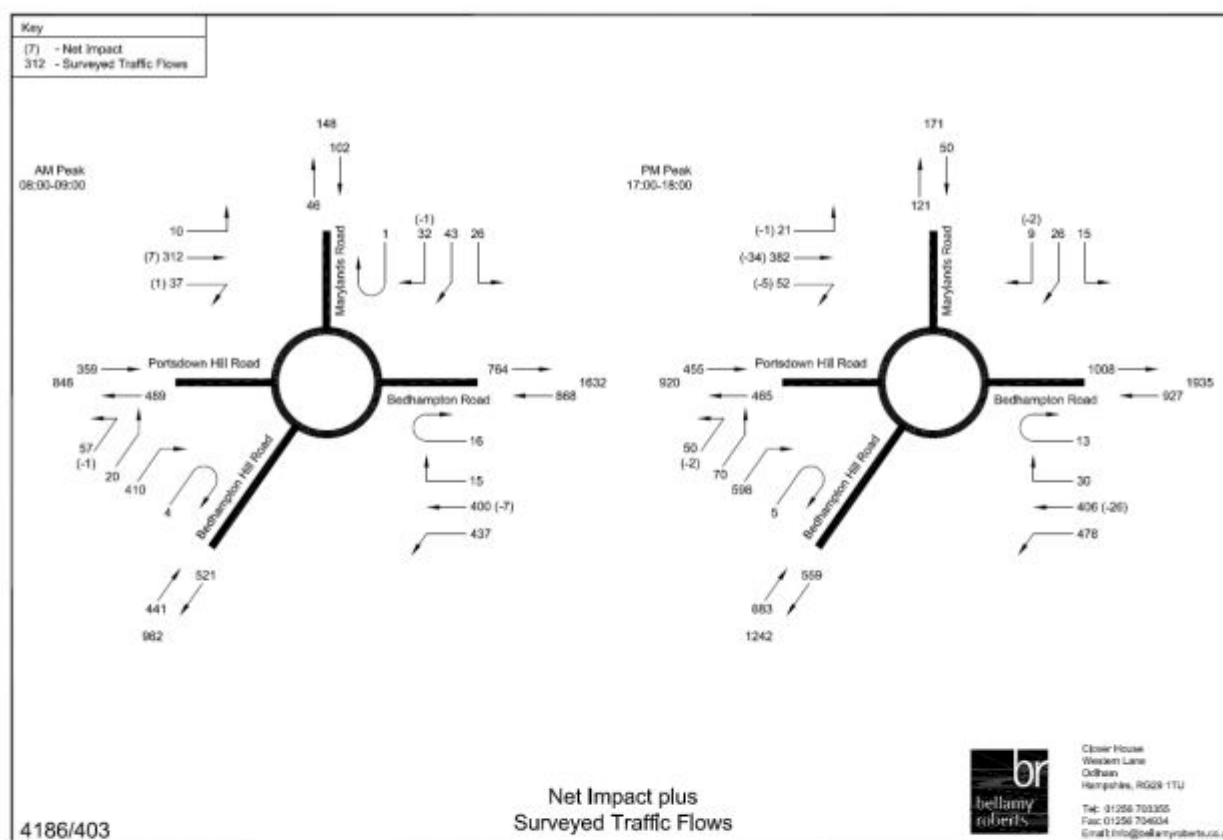
The proposals will contribute financially to local infrastructure, in accordance with Policy CS19, insofar as the viability of the scheme allows.

We believe the proposals to be fully compliant with the Council's adopted policies, and as such capable of full support as part of the Council's long term strategy to sustainably deliver the Borough's identified needs.

Traffic Impacts

The site has a lawful commercial use, and it is recognised within Department for Transport guidance that, when preparing a Transport Assessment, the traffic associated with the lawful use should be compared with the traffic associated with the proposed use. If this were not the case then the site would be treated on the same basis as a greenfield site, which it is not.

As such, when considering this site, it is reasonable to compare the predicted impact of the proposal with the impact of the existing uses, including traffic impacts. Future traffic impacts can be predicted by assessing the average number of traffic movements expected per house, and when these movements will be distributed during the day. There is a wealth of data which allows such predictions to be made with great accuracy.



The existing and proposed traffic flows are shown in the diagram above. The main figure for each arm of the roundabout shows the current morning and afternoon peak traffic flows; the figure in brackets shows the predicted change in traffic flows resulting from the proposed residential development.



Our recent survey of the Belmont Roundabout shows no material delays at present during the morning peak, although some queuing was experienced on the Bedhampton Hill arm during the afternoon peak hour period. Flows associated with the lawful use contributed to these queues. It is evident that the flows associated with the DIY store and bowling alley are greater than the flows predicted to be generated by the residential scheme. As such, even during peak periods, the impacts of the scheme when compared with the current uses are insignificant.

A highway improvement scheme has been proposed for the Belmont Roundabout comprising an enlarged central island and over-run area, to increase deflection and, in so doing, reduce vehicle speeds through the junction. This will allow vehicles to enter the roundabout with less difficulty, representing an improvement over the current situation.

We note local concerns that Glebe Park Avenue could be used as a 'rat run' by residents, but would point out that Glebe Park Avenue does not represent a desire line for drivers, being in the wrong direction for the centre of Havant, and no shorter than the route to the A3(M)/A27 via Portsdown Hill Road and Bedhampton Hill. The likelihood of rat running is no greater than it is currently, and with the improvements to the Belmont Roundabout it would be less attractive to use Glebe Park Avenue than it is currently.

Based upon the current guidance in the National Planning Policy Framework, the scheme will not have a severe impact on the surrounding network and, as such, should be granted planning permission.

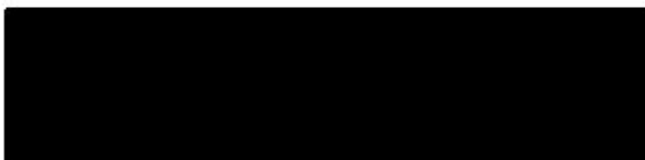
Stability of the Chalk Face

My clients have taken technical advice on this point (see the Ground Investigation Report submitted with the application). The chalk face is generally stable, and in these circumstances the most appropriate means of protecting end users is to leave the exposed faces as they are (including vegetation and roots on/in the faces) and to provide a sterile 'drop zone' and catch fence at the toe of the exposure where scree could collect, so that if any blocks were to fall from the face they would be retained by the fence. Typically catch fences are set back 2-10m from the face, depending on face height, angle and catch fence height. My clients would be willing to accept a condition requiring the provision of catch fences.

Conclusion

We firmly believe that the scheme is policy compliant, and that it will reduce traffic movements compared with the commercial use of the site. We look forward to a positive recommendation when the application is considered at Committee on 21 November.

Yours sincerely



Jeremy Heppell
Associate Director
For and on behalf of WYG

cc Mark Carrington, Linden Homes Southern
Scott Rawlings, Ankers & Rawlings Developments