

Our reference: 784-A096474

Havant Borough Council, Planning Department
Public Service Plaza,
Civic Centre Rd,
Havant
PO9 2AX

16th December 2020

Dear Sir/Madam,

**SITE: LAND WEST OF, HULBERT ROAD, HAVANT, PO9 3TB.
PROPOSAL: OUTLINE PLANNING APPLICATION WITH ALL MATTERS RESERVED EXCEPT
ACCESS FOR THE DEVELOPMENT OF UP TO 120 DWELLINGS AND ASSOCIATED IMPROVED
SITE ACCESS, LANDSCAPING, FOOTPATHS, SUDS AND OTHER ASSOCIATED WORKS.**

This letter summarises the details of WYG's technical and planning response to consultee comments made in relation to the above outline planning application. It identifies the relevant consultee response and lists documents that have been submitted alongside this letter to address each one.

Masterplan

Overall, very few consultee comments were raised explicitly in relation to the masterplan layout. Nonetheless, we have made a few tweaks to the masterplan in light of the technical comments received. These are summarised as follows:

- Having considered the Landscape Officer's comments, the hard central 'square' has been removed and incorporated into the more general 'central open space'. This can still incorporate design elements to facilitate small community events, as well as for general leisure and recreation.
- Following the comments from the EHO, we have clarified that the distance from the A3(M) highways edge to the nearest built form is 35m along the whole western edge.
- The landscape buffer has been tweaked and slightly widened to provide additional opportunities for substantive planting and ecological enhancement to provide a green corridor between the two woodland SINC's bounding the top and bottom of the site.
- Acoustic fence position and block structure has been slightly amended to bring the fence away from the northern and southern woodland edges.

Trees

A full tree survey has been undertaken of the site and route of the indicative route of the proposed footpaths along Hulbert Road.

- Tree Survey Plan 16030-BT3

These confirm that the majority of trees are low quality category 'C' trees. A number of low quality 'u' trees are also recommended for removal. Where the indicative routing of the pathway does cross into the RPA of category B trees, given the minimal encroachment and the existing road, such encroachment is not considered to prejudice the retention of these trees. Suitable construction techniques will be utilised for any part of the pathway within RPAs. Final details of tree protection measures and a construction method statement will be provided when the detailed reserved matters proposals come forward.

The woodland either side of the main development site does not represent a constraint to development in arboricultural terms.

Overall, the tree survey demonstrates that the development can occur without prejudicing the retention of important trees. The detailed design will take full account of the tree survey and resultant constraints.

Highways

Hampshire County Council, as the local highway authority, provided comments dated 1st September 2020 and WYG have comprehensively responded to these with the following documents that accompany this letter:

- Technical Note 01 (response to comments) – WYG, October 2020
- Framework Travel Plan (FTP) – WYG, October 2020
- The following drawings:
 - Proposed Site Access A096474-SK01 RevB
 - Proposed Footway A096474-SK02 RevC
 - Proposed Footway A096474-SK03 RevA

The Technical Note responds to each comment in turn and includes appendices as relevant. The FTP has also been updated to address comments received and a Tracked Change and clean copy are provided to illustrate the changes.

In addition, more detailed plans of the proposed footways north and south of the site are provided demonstrating the feasibility of these routes. The project Arboriculturalist (Barrell Tree Care) have also

confirmed that, with suitable construction methods, the proposed routing would not endanger Category A or B trees. Some removal of low quality trees may be required for existing highways safety reasons, irrespective of the current proposals for the site. The proposed path provides a safe and convenient route for pedestrians and cycles both north and south of the site so they can sustainability access nearby facilities and services.

Drainage

The LLFA response dated 3rd September 2020 required more information in order for them to make an informed decision on the application. The following documents have been supplied in order to address this lack of information and respond to the LLFA comments:

- Letter referenced A096474/LLFA and dated 26th October 2020 to Sarah Reghif of the Flood & Water Management Team
- The following drawings:
 - Site Plan (1:1250) – Southern Water, 26th March 2020
 - 368391_Hulbert Road, Havant, W (1:2500) – Southern Water, 29th January 2020

It is also worth highlighting that this application is in outline and hence does not and cannot include detailed drainage proposals for the site. Suffice to say the submitted FRA and above documents demonstrate that the site is not at high risk of flooding and can be sustainably drained. SuDs features that provide dual drainage and ecological benefits will also be considered where feasible at the detailed design stage.

Our drainage engineer has also not raised any concerns regarding the proposed footpath and existing ditch that cannot be resolved at detailed design stage and can be secured via a future reserved matters application.

Air Quality and Contamination

The Environmental Health response dated 8th September 2020 raised issues of potential contamination and air pollution. The Officer confirmed that planning conditions could control potential risks from contamination. However, they were uncomfortable with accepting that "no air-pollution exposure mitigation is required". The concluding response from the Environmental Health team is a holding objection with more details being required, the following documents have been provided to address this objection:

- Air Quality Comments Response – WYG, 28th October 2020
- Air Quality Assessment – WYG, October 2020 [updated]

Overall, they provide the additional information required and demonstrate that NO₂ levels do not exceed the AQO limit for on site receptors.

It is also worth noting that the EHO concludes in their response that the majority of issues raised ‘...could be deferred to the reserved matters stage.’ We can confirm that the points raised will be considered further during the detailed design process at Reserved Matters stage and it does not appear there are any in-principle problems so this point can be resolved.

Noise

Environmental Health Officer, Mark Moss, commented on the application on 23rd September 2020 and the main noise concern raised was in relation to the A3M motorway and the adjacent Hulbert Road. Queries raised have been addressed and clarification made as necessary in the following document:

- Response to comments received from Regulatory Officer, Environmental Health (Mr Mark Moss) at Havant Borough Council (HBC) received on 23rd September 2020 regarding the submitted Noise Assessment by WYG (ref A096474 dated 20th May 2020) for planning application reference APP/20/00441 – WYG, 26th October 2020

The EHO raised no overriding concerns regarding noise and confirmed that details, such as window specifications, could be provided at Reserved Matters stage and therefore this issue can be resolved satisfactorily. It is also worth noting that sites with a similar relationship to the A3(M) are proposed for allocation in the emerging local plan. For example, site H22, at Scratchface Lane proposed for allocation for 50 houses

Ecology

The ecology response from Tristan Norton summarised that there was not sufficient information to give a detailed response and requested that the Dormouse and Bat Surveys recommended in the Ecological Appraisal (WYG, December 2019) be completed prior to determination. These have now been completed and the subsequent reports are included with this submission as follows:

- Dormouse Report – WYG, January 2020
- Bat Report – WYG, December 2020

Together with the original ecological Appraisal, the reports set out mitigation measures which will be followed to prevent harm to protected species. This will include sensitively designed lighting and new suitable habitats. The applicant, who also controls the immediate woodland to the north and south of the site, is also willing to consider reasonable enhancements within the woodland to improve its biodiversity value.

We note the request for a EMMP. However, we consider the detailed reserved matters stage would be the appropriate time to provide this detailed document so it can be developed in conjunction with the detailed site and landscape design.

Planning

The Planning Policy response dated 10th September 2020 highlighted several concerns with the principle of development, namely the Council's consideration of this site as 'isolated'. WYG's rebuttal to this response is contained within the following document that accompanies this letter:

- Response to Planning Policy Comments Dated 10th September 2020

We trust that the submissions listed above, and provided alongside this letter, are sufficient to deal with the matters raised by consultees. We believe that there are no outstanding technical matters and that all issues, other than the policy point, have been addressed. Please do not hesitate to contact me should you have any queries.

Yours sincerely,



Nick Billington
Associate Director - Planning
For and on behalf of **WYG**