

9 August 2023

Attention: Lesley Wells
Havant Borough Council

By email only

SLR Project No.: 402.064848.00001

RE: APP/22/00669 - Land at Kingscroft Farm, Havant

On behalf of our client, Foreman Homes, we write to respond to the comments raised by the Council's consultees on the outline planning application relating to the above site. We have submitted a pack of additional and amended reports and plans as explained in this letter. The list of information submitted is set out at the end of this letter. We are also pleased to see that no objections have been raised by various consultees, such as Archaeology, Housing and Heritage.

Planning Policy

The Planning Policy team have noted that weight should be given to the contribution the proposed development would make towards the Borough's current undersupply of housing, but that in order to support the departure from the development plan, the matter of flood risk needs to be addressed.

The red line application boundary has therefore been amended and reduced in size so that it now avoids both present day flood risk and the climate change outline, thereby avoiding flood risk and meaning that a sequential test is not required. This is set out in further detail in the revised Flood Risk Assessment and Drainage Strategy. As a result of this, the site area has now reduced to 3.39ha and the proposed number of dwellings is now "up to 120" instead of "up to 140".

This now addresses the comments raised by Planning Policy.

LLFA

The LLFA requested further information relating to the proposed surface water strategy, urban creep within hydraulic calculations and for exceedance flow routes and flood extents to be shown in the drainage layout. The revised Flood Risk Assessment and Drainage Strategy has provided this further information and sufficiently addresses the comments made by the LLFA.

EA

The EA initially objected to this application because whilst they have no objection to the principle of the residential development on this site, they have concerns regarding the proposed access as it involves building an access and egress over the bellmouth culvert which is a strategic main river flood relief channel.

Following this, the drainage consultant met with the EA on site to discuss the proposals. It was suggested that there were two options that could be proposed to address the concern: option A being

that the road could be raised slightly to increase the cover over the culvert, and option B being the provision of a reinforced concrete slab beneath the road, and the design details could be conditioned. The EA agreed that option A would be preferable and the proposals were acceptable in principle subject to the undertaking of further investigation and design work as part of the ongoing design of the scheme through conditions.

Therefore, we understand the EA no longer object and agree to the principle of the proposals, subject to further details coming forward through condition.

Highways & Network Rail

Hampshire County Council (HCC) Highways have provided their comments on the proposals. We are currently in discussions with HCC in order to address their queries and concerns. A Transport Assessment Addendum and revised Travel Plan will therefore be submitted shortly.

The ownership of Ranelagh Road has also been queried, as a 30m stretch at the western end of the Road at the junction with Meyrick Road is proposed to be upgraded to 5.5m, as well as a 2m footway connecting to the existing provision. Submitted with this letter is a declaration by Chris Hardyman of Portsmouth Water. This confirms that Portsmouth Water Limited and their predecessors in title have held the legal title to all the land along the entire frontage of Ranelagh Road from at least 17th September 1898 until 25th July 2006 when the part was sold. Portsmouth Water continues to hold the legal estate in all the remaining land along Ranelagh Road. The details are set out within the declaration.

HCC Countryside / Public Right of Way

HCC Countryside initially issued a holding objection subject to further information and inclusion of the PROW in the outline application. We have since been in discussions with HCC Countryside in collaboration with HCC Highways and have reached an agreed way forward. The details of which will be set out within the Transport Assessment Addendum which will be submitted shortly.

Planning Policy - Nutrients

The Planning Policy Nutrients team requested that evidence of the 'lowland' land use of the site for the past 10 years is submitted. Therefore, we previously submitted aerial images of the site dating back to 2011, as suggested in the Council's Position Statement and Mitigation Plan for Nutrient Neutral Development. However further information has subsequently been requested, such as any deeds of agreement. Submitted with this letter is therefore a grazing licence dated from 2008. This license demonstrates the right of the licensees to keep horses at the site for grazing purposes and has been continued unbroken since 2008.

Also, given the site area and the proposed number of dwellings has changed, a revised nutrient budget calculator and accompanying Land Use Plan has been submitted with this letter. This estimates that



the total annual nitrogen load to mitigate is 124.4 kg TN/year. However the final figure will need to be determined at reserved matters stage once the exact housing mix is known.

In addition, it is understood that the Council's mitigation scheme at Warblington Farm has very limited capacity and so developers are advised to secure mitigation from an alternative scheme. We have therefore been in contact with Cicero Estates regarding the nutrient mitigation scheme at Knowle Village who have available credits.

We have also been in contact with the land agent (Land Consult) for the Warnford Park Estate mitigation scheme, who has confirmed that there is ample capacity to mitigate this scheme and the credits can be formally reserved once contracts have been exchanged between the applicant and Warnford Park Estate. A letter from Land Consult is submitted with this letter confirming this. We understand the scheme is currently in the process of completing the legal agreement with Havant Borough Council, which is anticipated to be completed within the next couple of weeks.

Both schemes have the support of Natural England and confirmation on the chosen scheme will be provided in due course.

Trees

It was raised that the originally submitted Arboricultural Impact Assessment (AIA) did not pick up on two TPO groups within the site. As a result, a revised AIA has therefore been submitted.

The two TPO groups are located on the junction of the Ranelagh Road and Meyrick Road, where it is proposed to introduce a new 2 metre footway to connect to the existing provision. The AIA explains that given the hard surfacing present, impacts on the root protection areas of these TPOs should be minimal as the existing sub base can be kept in situ and augmented to accommodate the new hardstanding. Where the new hardstanding is to be installed, this can be constructed adoption a 'no dig' approach. Such works would be fully detailed and specified within an Arboricultural Method Statement at reserved matters stage.

Ecology

Submitted with this letter is an Addendum letter prepared by Eco Support which responds to the comments raised by the Biodiversity Officer. Also submitted is an updated Preliminary Ecological Appraisal, Dormouse Survey, Bat Activity Survey and Reptile Mitigation Strategy. This should now satisfactorily address the comments from the Biodiversity Officer, including recommendations for ecological enhancements as requested.

Landscape

The Landscape Officer has raised several points relating to landscape intervention to reduce the impact of the adjacent industrial units and A27, celebrating the Hermitage Stream, planting and back to back distances, however all of these comments are beyond the scope of this outline application but can be



taken on board and incorporated into the scheme at reserved matters stage when the layout will be put forwards for approval.

Environmental Health

The Environmental Health Officer has confirmed he has no objection in principle to the proposed access from Meyrick Road. However he has concerns about the close proximity to the A27 and existing industrial units and potential noise impacts. The Noise Impact Assessment prepared by Omnia confirms that subject to incorporated mitigation measures relating to glazing and ventilation, there should not be any adverse impact due to the existing noise sources. The precise mitigation details can be proposed and assessed at reserved matters stage.

Crime Prevention

The Designing Out Crime Officer has commented on the proposals and has suggested various design amendments to improve the prevention of crime and disorder. However as this is an outline application with all matters reserved except for access, the submitted layout is only for illustrative purposes at this stage and will be finalised at reserved matters stage.

Utilities

It was requested by Havant Borough Council that a Utilities Assessment is submitted in support of the application. This is therefore submitted alongside this letter. This sets out the utilities capacity checks and confirms that there is sufficient capacity to accommodate the development.

Minerals and Waste

HCC as mineral planning authority have requested further information in the form of a Mineral Resource Assessment as it is considered the site has significant mineral potential. This is therefore currently being prepared and will be submitted in due course.

We trust this amendments pack has addressed the comments and concerns raised and positively improves the scheme, with the further outstanding details as explained above to follow shortly. Should you have any questions or wish to discuss, please do not hesitate to contact us.

Yours sincerely,

SLR Consulting Limited



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Reports and plans submitted with this letter:

Location Plan (Ref. 18.099.01 Rev F)

Illustrative Site Plan (Ref. 18.099.02 Rev J)

Flood Risk Assessment & Drainage Strategy (July 2023) (Ref. 2200510-R03)

Declaration by Portsmouth Water (30th June 2023)

Grazing License (5th June 2008)

Nutrient Budget Calculator (01 August 2023)

Proposed Land Use Plan (Rev D)

Letter from Land Consult regarding Warnford Park Estate Nitrate Mitigation scheme

Preliminary Arboricultural Impact Assessment (26th July 2023)

Ecology Addendum (October 2022)

Preliminary Ecological Appraisal (18th May 2023)

Dormouse Survey (18th May 2023)

Bat Activity Survey (18th May 2023)

Reptile Survey & Mitigation Strategy (18th May 2023)

Utilities Appraisal (July 2023)

