



Our Ref:- H/69/MK

Your Ref:- APP/16/00774

Havant Borough Council
Development Control
Public Service Plaza
Civic Centre Road
Havant
PO9 2AX

3rd March 2017

Dear Ms Haywood

Land to the north of Havant Road and west of Selangor Avenue, Emsworth

I have been requested to address the comments made to date on the planning application submitted in July 2016 for 192 dwellings but which has now been amended to 161 dwellings. Firstly, I will address the comments made by internal and external consultees and, secondly, the comments made by third parties, including those from Emsworth Residents Association.

Comments from Internal & External Consultees

HCC – Education

A financial contribution will be paid by Barratt Homes towards the provision of additional pupil places at Emsworth Primary School. It is understood that this School is due to be expanded in 2018 to provide 60 school places per year group.

HCC Drainage

The queries raised by Hampshire County Council have been addressed within the revised Flood Risk Assessment accompanying the amended planning application.

HCC Minerals

The applicant has now provided a Minerals Assessment Report with the amended application. This concludes that the site is not suitable for larger scale extraction. Furthermore, it is considered that whilst the near surface potentially brickworks suitable clay

could be considered for medium to smaller Scale extraction, there is no viability for onsite reuse and there is no sustainable economic basis for transportation of any suitable clay to the nearest brick manufacturer approximately 33 miles away.

HCC Ecology

The County Ecologist raised no overall concerns with the original proposal in terms of its ecological impact but considered that some additional information was required to address the off-site areas supporting wintering bird species. WYG's Wintering Bird Survey Report addresses the comments made by the County Ecologist and those of Natural England in respect of the records for Brent Geese on sites to the south of Havant Road.

Natural England

The applicant was requested to refer to records of recent Brent geese activity within fields to the south of Havant Road, and to demonstrate how access to these fields would be robustly prohibited to visitors and dogs. Additional information to mitigate this issue is included within the Wintering Bird Survey Report prepared by WYG.

HCC Highways

County Highways provided a very detailed response to the original planning application and additional information was sought from the applicant relating to the site access arrangements (HCC's preference was for a signalised junction), the A27/Havant Road Roundabout modelling and mitigation, the A27/Emsworth Road Roundabout modelling and mitigation, sustainable transport contribution and Travel Plan. Paul Basham Associates has continued to liaise with Hampshire County Council and Highways England in respect of highways matters at the site and their Transport Statement Addendum and revised Travel Plan addresses the issues raised.

HCC Countryside Service

The Countryside Access Officer queried if the permissive route from Havant Road down to Havant Footpath 56, which is part of the Wayfarers Walk. Solent Way, could be formalised into a public right of way. Whilst this is not without merit, it would require the agreement of the landowner for the scheme to proceed. Unfortunately, the applicant does not own or control land along this route as such cannot assist with this request.



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Chartered Town Planners

Directors: Bryan S. Jezeph BA DipTP MRTPI FRICS FRESA Caroline J. Jezeph BA BTP MRTPI Christopher L. Ward BA LLM MRTPI

Principal Planner: Michael D. Knappett BSc BTP MRTPI Finance Administrator: Nicola L. Gladwell

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HBC Landscape

The applicant met with the Council's Landscape Officer (and others) on 19th September 2016 to discuss her objection to the original scheme, which was in relation to the content of the Landscape & Visual Impact Appraisal, general layout observations and on the submitted planting plans. The Council's Landscape Architect's comments have been addressed by ACD Environmental in their revised Landscape & Visual Impact Appraisal and planting plans, which form part of the package of landscaping information accompanying the revised application. The Landscape Officer has also been consulted on subsequent amended layouts which have been circulated to the Case Officer.

Crime Prevention Design Advisor

Comments were made on the original scheme for 192 dwellings, one of which in relation to the need to reduce permeability (and connectivity about the development) was disputed with Council officers. Designing a scheme which promotes permeability is good design. Other comments have been considered in the redesign of the scheme for the site.

Chichester Harbour Conservancy

This organisation objected to the original application for six reasons. Firstly, in response, the application site includes sufficient open space for recreational activity and dog walking on site. In addition, payment of a financial contribution to the Solent Recreation Mitigation Project will also help to offset the recreational impact of the proposed development. Secondly, the principle of residential development on this site is acceptable as the site has been allocated for residential development in the Havant Local Plan Housing Statement, adopted in December 2016. The application site is also 1.1km distant from the coast and would not harm the setting of the AONB. Thirdly, the scheme will include a 'green wildlife corridor' on its eastern side and other protected species mitigation and enhancement measures. With regard to the fourth issue and development of another site on the southern side of Havant Road, were an application to be submitted for this site, then it should be considered on its merits. The proposed pumping station has been relocated and reoriented within the scheme and would hopefully be adopted by Southern Water (5th Issue). Southern Water will ultimately have to approve the measures proposed to deal with foul sewerage at the site, and as such, they would be best placed to comment on the specific proposals for the site (6th Issue)



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Network Rail

Network Rail provided detailed advice on the measures to follow would any development take place on their land or within their airspace. Specific advice was also provided in relation to planting adjacent to the railway boundary.

Southern Gas Networks

SGN objected to the original scheme on the basis that properties were proposed to be built over the existing pipeline and within its easement, notwithstanding the proposal to relocate the pipeline. Officers were requested to consult Network Rail again and seek a response from them on the specific proposal to relocate the existing gap pipeline and to erect the proposed dwellings. Following further consultation with SGB, the applicant has decided to retain the gas pipeline in-situ and to design the scheme around it with a suitable easement.

HBC Housing

The amended scheme proposes 48 onsite affordable dwellings, with the majority of these to be 2 and 3 bed dwellings. The original scheme focused on providing a majority of 1 bed affordable dwellings that were not considered suitable for families. The 48 affordable dwellings would be split into three different tenures: affordable rent, intermediate and starter homes, and their provision would be secured within a s.106 legal agreement.

HBC Community Infrastructure Officer

The Officer provided advice in relation to the items to be included within a s.106, the requirement for a monitoring fee to be paid and that CLL will be levied on this development.

HCC Archaeology, HBC Environmental Health, Southern Water, HBC's Traffic Management Team, Portsmouth Water & Environment Agency

These consultees all raised no objection to the original application subject to the imposition of suitable planning conditions. In addition, Building Control provided minor technical comments on the original scheme. Hampshire Fire & Rescue also provided informative advice in relation to reducing fire risk as part of the development.



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Comments from Third Parties

The first round of consultation on the planning application resulted in 56 objections to the original application. The issues raised can be summarised as follows:

- Multiple highway objections raised in relation to the following issues: junction capacities, traffic count surveys, congestion on roads, form of access junction, internal road layout, extra traffic onto A259 and A27, additional car and contractor parking in Selangor Avenue and that road not being suitable for an access point, among others
 - Flooding Concerns
 - Doubt that existing drainage infrastructure could cope
 - Loss of green space and merging with Havant
 - Contrary to Local Plan
 - Allocation of the site previously rejected by Inspector
 - HBC has a 5-year housing land supply
 - Draft Local Plan Housing Statement is not part of the statutory development plan at this stage
 - The parcel of land is an undeveloped gap separating Emsworth and Havant
 - Commitment in the Corporate Strategy to maintain the Gap
 - Other possible areas should be considered before developing in a strategic gap
 - Increased pressure on doctors/schools
 - Parents will not walk their children to Emsworth Primary School
 - Density is a concern/inappropriate. Overdevelopment
 - Inappropriate to have 3-storey development when only single-storey bungalows are present bordering the site
 - Privacy should be ensured
 - 31 and 33 Selangor Avenue will have an open view of development
 - Outlook affected
 - Overlooking and possible loss of light issues
 - Area of green space is minimal
 - Increased noise and air pollution from the increased traffic
 - Need to preserve areas of natural habitat to encourage wildlife
 - Relocation of gas main will have a significant effect on existing residents
 - Site would make a good location for a solar farm

Highways Issues

The applicant's highways consultants, Paul Basham Associates, has continued to liaise with Hampshire County Council and Highways England in respect of highways matters at the site. The access to the site has been changed to a signalised junction and additional junction



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modeling has been carried out, to address matters raised by both consultees. Other highways issues are covered within the Addendum Transport Assessment and Revised Travel Plan submitted for this site.

Flooding & Drainage

All sources of flood risk have been assessed including tidal, fluvial, artificial drainage, overland, infrastructure failure and groundwater. The conclusion of the assessment is that all risks are considered as low, providing that necessary mitigation measures for surface water drainage are undertaken. The pre-existing low risk of surface water flooding is mitigated through incorporation of a Sustainable Drainage System which will store the volume of a 100-year return period storm plus allowance for climatic change; the surface water drainage system will ensure no increase in flood risk to adjacent or downstream sites. Proposals include the raising of road levels and finished floor levels in areas of potential high groundwater which mitigates any pre-existing risk to the site.

The principle of Residential Development on the site

Whilst the site was previously promoted as an urban extension site, this site has now been allocated for residential development in the Council's Local Plan Housing Statement, which was adopted in December 2016, despite it lying in the strategic gap. Therefore, the principle of residential development on this site is no longer in question.

Paragraphs 2.7-2.9 of the Council's Local Plan Housing Statement address the issue of the Council's 5-year housing land supply. The Planning Inspectorate allowed an appeal on 25th August 2016 for 42 retirement apartments for older people at 38 London Road, Purbrook on the basis that the Council could not demonstrate a 5-year housing land supply when applying the Borough's Objectively Assessed Needs (OAN), in accordance with paragraph 47 of the NPPF.

The Gas Main

The High-Pressure Gas Main will now remain in-situ and the whole new scheme has been designed around it with a suitable easement.



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Pressure on Doctors/Schools

Barratt Homes will pay a financial contribution towards the expansion of Emsworth Primary School as a result of this development. This will be secured within a signed s.106 legal agreement. The site is located within close proximity of Emsworth Primary School such that local residents would be able to walk safely from the site out onto Selangor Avenue and then Victoria Road before reaching the School.

Emsworth Surgery and other local GP practices are currently accepting new patients and so those living within the proposed development will be able to register with a local GP.

Density of Proposed Development and Other Amenity Issues

The development of 161 dwellings on a site extending to 6.23 hectares would equate to 25.8 dwellings per hectare (dph). By this measure alone, the site cannot possibly be considered to constitute overdevelopment. In addition, the 2.37 of public open space will be provided onsite to serve the development.

The whole scheme has now been redesigned so that the only three-storey development would comprise the five apartment blocks along the rear boundary with the A27. The view through the site from the gap in the bend along Selangor Avenue would be of two-storey housing, which would also back on to properties in Selangor Avenue.

The outlook for properties in Selangor Avenue has been improved by redesigning the scheme, with the closest properties onsite moved further away from the rear boundaries of properties in Selangor Avenue. Existing property owners in Selangor Avenue can always improve their rear boundaries, where they are low lying or incomplete to enclose their properties more fully.

It is not considered there would be any overlooking issues or loss of light concerns arising from the amendments to the scheme.

The Council's Environmental Health Officer is satisfied with the proposed development, in terms of its impact upon local air quality and noise.

Ecology/Solar Farm

The planning application includes a detailed Ecological Mitigation and Management Plan. This plan addresses the following items with a view to maintaining and enhancing the biodiversity value of the site in the long-term: 1. Mitigation for protected and notable



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habitats and species that may be impacted by the proposals; and 2. Management of retained, enhanced and created habitats.

It is not considered that this site would be considered suitable for a solar farm given the proximity of adjoining residential properties. Such developments are often located away from existing settlements in the countryside.

I would be grateful if you could take on board these comments when assessing the amendments made to the original scheme.

Please do not hesitate to contact me should you have any further queries in respect of the amendments to the planning application.

Yours sincerely



Michael Knappett

Enc.

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