



20th November 2018

Dear Sirs,

Your Reference: APP/18/01033

Town and Country Planning Act 1990 (as amended) and Town and Country Planning (Development Management Procedure) (England) Order 2015

Agricultural Land East of Castle and St Georges Avenues, Warblington, Havant

Planning Application for proposed residential development and associated works

I refer to your letter of 2nd November in connection with the above and wish to make representations as an owner of land contiguous with the proposed development site. These are generally intended to be constructive with the purpose of assisting the Local Planning Authority's (LPA's) Development Management Committee in applying the LPA's established policies when considering the application. There is no particular order of importance in the following.

PLEASE - NO MORE HOMIES FOR GNOMIES LMS

Use of Delegated Powers to determine the application:-

It is noted that the application processing section of the LPA's website indicates it is anticipated this application is to be determined under delegated powers. The application is by no means of a minor, or relatively insignificant nature. It challenges several general planning principles together with established policies of the LPA. In such circumstances it is to be expected that the LPA's Development Management Committee would see it as its public duty and responsibility to carefully assess the application in full, rather than leave the matter under delegation.

Loss of viable Agricultural Land and green fields, a limited resource:-

We all know they don't make land anymore. Developing greenfield sites is the easy way out to meet housing demand and resort to it should only be contemplated once all other opportunities to redevelop previously developed land have been exhausted.

Although currently in use for grazing, the land was formerly a productive hayfield. Once lost to development, there is no prospect of the site returning to agricultural use.

In this context it is important that the LPA be satisfied that every industrial, commercial, retail, leisure, military, statutory authority and residential brownfield opportunity has been exhausted.

Concentration of Development in Urban Areas:-

LPA Policy CS 17 seeks to:

1. Concentrate new housing within urban areas and
2. Prioritise development on previously developed land.

The Policy also states that "Development in non-urban areas will only be permitted if this is consistent with the policies for the countryside set out in national policy".

As currently undeveloped land, the proposed development site is strictly a non-urban area.

Loss of Countryside, Encroachment, diminution (and prospectively eventual elimination), of the long respected and until now, jealously protected undeveloped gap separating and defining the settlements of Havant/Warblington and Emsworth:-

The LPA's Policy CS11 paragraph 9, states that planning permission will be granted for development that..."Maintains undeveloped gaps between the settlements of Emsworth/Havant..."

It is noted that, in addition to the proposed development itself, at the southern end of the land an area is set aside for future access for possible future development of adjoining land to the east. Similar provision is made for an extended St Georges Avenue to provide access to adjoining land to the east.

One of the purposes for introduction of the Planning and associated Acts was to protect the countryside, restrict and prevent undesirable ribbon development, urban sprawl and the gradual merging of distinct settlements. The proposed development if consented will not serve to uphold these aims and to grant consent will clearly be a contravention of the general intention of the LPA's own Policy CS11. Any reduction in the settlements gap and/or reservation of access for future development directly undermines proper and effective implementation of the LPA's Policy.

Underlying Minerals:-

It has not been possible to download from the LPA's website the minerals/geology documents associated with this application. It is noted from Hampshire County Council's (HCC's) Minerals and Waste Plan and Policies map that the underlying deposits to the application site are superficial soft sand and gravel, with additionally, brick clay to the southern part of the site. Presumably as the relevant mineral authority, HCC's express consent is required if the development is to be allowed to proceed without prior extraction of workable deposits.



Density of dwellings per unit of land area and plot size:- Not "appropriate to its location".

The LPA's Policy CS9, in explanatory paragraph 6.21, states that density of new housing will depend on, inter alia, "appropriateness to its location".

Paragraph 4 requires respect for "the surrounding character and built form" and explanatory paragraph 6.23 reiterates the need for parties in the development process to reflect "surrounding built character and the amenity of neighbouring residents"

A brief tour, or consideration of Google satellite photos, to evaluate built density in the immediately locality through which it is proposed the scheme will have to be accessed (St Georges, Castle and Warblington Avenues) will confirm that the proposed density is significantly greater than is appropriate to its location and that it is excessive.

The east-west width of the development site approximates the east-west plot depth of the existing dwellings on the eastern side only of Castle Avenue, yet the proposal is to include dwellings on both sides of a new north-south spine road which itself will diminish the residual new plot depths to less than half of those of the nearest existing dwellings.

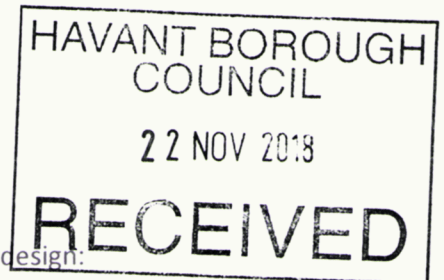
The north side of St Georges Avenue, both sides of Castle Avenue and the east side of Warblington Avenue, the lengths of each of which are not greatly dissimilar to the north-south length of the development site, are each fronted by of the order of a maximum of 24 or so dwellings, including later additional back land infilling. This figure includes an adjustment of +4 in assuming that Castle and Warblington Avenues extended northwards up to the railway fence.

NB. Because of the presence of the lawn tennis club grounds and the interruption of the south side of St Georges Avenue by intersecting roads, the existing numbers of dwellings on the west side of Warblington Avenue and the south side of St Georges Avenue are distorted/less typical, so have been disregarded in this comparison.

To equate to existing local density and plot size would indicate that not more than 24-25 dwellings would be "appropriate to its location" for the development site. 48-50 dwellings would already be double the existing local density. That cannot be "appropriate", 69 dwellings even less so.

There are approximately 120 dwellings within the block enclosed by Southleigh Road, Emsworth Road, the easternmost garden boundary of houses fronting the east side of Castle Avenue and the Southern Railway. The proposed development site represents approximately 1/5th of the area of that block. An additional 69 dwellings represents a 57.5% increase in the number of dwellings on the enlarged block which would increase in area by only 20%.





The Policy requires that ".....All development should demonstrate that its design:

1. Responds to, draws inspiration from and respects local context and:

....c) Uses the characteristics of the locality to help inform the design of the new development including.....existing buildings lines, plot widths and depths..."

The proposed development fails to respect the existing building lines of St Georges Avenue by extending them into and eastwards across the development site. This is inconsistent with the Design Policy.

Additionally the existing St Georges Avenue back of pavement lines are not respected and extended into and eastwards across the development site, leading to narrower pavement widths on the development site. This cannot be appropriate if a proportion of the residents of 69 dwellings and their visitors are to be pedestrians travelling to and from local public transport facilities, schools etc.

Furthermore, if there were to be future development on land to the east of the development site, there will be even greater numbers of pedestrians using the extended St Georges Avenue.

The proposed development fails to respect the plot widths and depths of the locality. Most existing plots have a frontage of at least 50 feet (15.24m), some considerably greater. It is known one plot has a frontage of 40 feet (12.19m). Except corner sites, existing plot depths are generally of the order of 200 feet (60.96m).

The local character of the immediate and nearby areas is of well separated dwellings set behind front garden hedges and fences in a generally calm and quiet environment with very low vehicular traffic flow at nearly all times of the day, night and over weekends and public holidays. The low volume of traffic at the eastern end of St Georges Avenue, close to its intersection with Castle Avenue, has for the past half century made it a regular, safe and desirable location for driving instructors and their pupils to practice the requisite manoeuvres of the driving test several times a day. This facility will be lost if the proposed development is implemented as additional traffic movements generated from 69 dwellings will render it unsafe and impractical.

Generally there is limited street parking by residents, increasing when contractors' and service vehicles are in attendance.

Most dwellings have at least one garage and any on-site parking is generally some distance from the back of pavement line, concealed to some extent within the partial enclosure of the front hedge or fence, in many cases visible only through gateways.

Site infill and piecemeal plot redevelopments subsequent to the original development of the immediate area, which it is believed commenced in the Edwardian era, have in most cases

sensitively respected, preserved, enhanced and sustained this character. Ryecroft, off Warblington Avenue, on the former grounds of Mr Pink's house, being an excellent example.

The LPA's influence, at least until now, in ensuring the retention of the area's character should not go unrecognised.

It is most doubtful that the proposed development in its present concentrated form will contribute in the same positive way to the character of the immediately adjoining built area, principally because of its excessive density, which will be detrimental to the amenity of neighbouring residents, especially through additional traffic flows generated from the development site.

There is also the potential that increasing vehicle ownership levels per dwelling will lead to uncontrolled parking overspill from the development site onto the existing residential roads, with loss of amenity for neighbouring residents and a greater risk of traffic accidents due to parked vehicles restricting the width of the carriageway available for movement. The narrowness of the roads within the site, combined with the very limited extent of front garden areas, almost entirely consumed by residents' parking bays, will also lead to parking congestion within the site. The proposed street scene, already materially compromised by the presence of numerous front area parking bays and absence of front hedges or fences, will be rendered even more unattractive. To alleviate this it is recommended that, as is the case with the majority of nearby existing dwellings, each dwelling should be provided with a garage set no further forward than the building line and subject to a planning condition that it cannot be converted into habitable accommodation, or office. The inclusion of front hedges or fences would also serve to conceal the clutter of on-site parking which visually detracts from the street scene.

It is perhaps pertinent to note that the applicant's depiction of street elevations displays not one vehicle.

It has been said that a nearby housing development which created a private estate on the east side of Denvilles has brought about parking overspill onto nearby adopted approach roads, partly as a result of those managing the private estate apparently imposing a requirement that no commercial vehicles are to be parked on the estate land and roads. This has resulted in loss of amenity for residents of the established dwellings which front adopted roads as residents of the private estate who own or drive commercial vehicles have been obliged to remove such vehicles from the estate, only to park on roads nearby. This is a set of circumstances which should not be repeated elsewhere and can be controlled with appropriate planning conditions.

Existing Surface and Foul Water drainage infrastructures:-

It is noted that neither the existing 175mm diameter foul water, nor the 225mm diameter surface water sewers are considered by the relevant authorities to have adequate capacity to accommodate the anticipated additional discharges from the proposed development site and that soakaway drainage of surface water may not be feasible.



It is not clear what proposals there are to overcome these issues, nor how long it will take before adequate capacity becomes available. It is important that existing connections downstream are not compromised by precipitate connection of the development site in advance of the implementation of a sustainable solution.

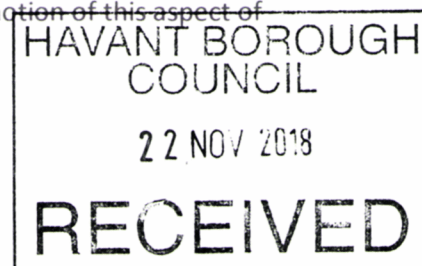
Social integration:-

Policy CS16 paragraph 4 states that "...All development should demonstrate that its design:

Is inclusive by considering the needs of those with disabilities ensuring safe and convenient access for all "-:-

There appear to be no proposed single floor dwellings to accommodate the needs of the elderly and infirm impaired by reduced mobility, but otherwise independent. The promotion of this aspect of social integration appears to have been overlooked.

Noise Pollution:-



At the southern end of the development site, day and night traffic and tyre noise from the elevated A27 dual carriageway will cause discomfort for occupants, particularly when out of doors.

In this context it should be remembered that following construction of the elevated A27, even residents at the northern extremity of existing development, with properties in St Georges Avenue backing onto the railway, received statutory compensation for injurious affection.

Although some measures have subsequently been implemented to attenuate traffic noise pollution, the problem remains and the development site is not entirely suitable for residential use, especially close to the A27.

Hedgehog Holes:-

One of the application drawings depicts the proposed positions of holes in fences and boundaries enabling hedgehogs to move between plots. However for the thirsty, there does not appear to be any such provision which would facilitate access to the pond from the adjoining plots.

Larch Lap Fencing:-

Drawing No. A-02-012-BT, Rev B, dated 11/09/18 depicts the use of 1.8m Larch Lap Panel fencing. What is not indicated is the material of the supporting posts. Assuming these are also to be of larch, or similar, the experience of many has shown the combination has a limited life. In strong winds panels transfer the full wind loading to the posts, which have a tendency to rot and break at ground

level. Damage to the panels results and both have to be replaced. If the posts are set in concrete it is difficult to remove in order to renew a fence section. A more durable and sustainable fencing solution with wind permeable panels should be considered.

Yours faithfully,



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

