

Mrs Daphney Haywood
Havant Borough Council,
Public Service Plaza,
Civic Centre Road,
Havant
PO9 2AX

April 04 2018

Dear Mrs Haywood,

APP/17/00320 Rear of 70 Havant Road, Hayling Island, PO11 0LH

We write in connection with application 18/00300 at 70 Havant Road, Hayling Island. We wish to OBJECT to the proposed scheme in the strongest possible terms, which we will outline below. Whilst the feedback from the previous applications and appeal have been acknowledged, we feel that many of the issues in relation to the prior applications remain.

We suspect that the LPA will be under pressure to allow some form of development, however, we consider that almost every aspect of the scheme is contrary to the Local Plan. It is still ill-considered, over poor design quality and has a significant detrimental effect on the listed building and its neighbours.

Summary of key points

1. Gardens are not brownfield or previously developed land, so there is no presumption in favour of development (CS17)
2. The revised scheme degrades the soft edge between the urban and non-urban landscape (AL2)
3. The green gap in the urban landscape provides valued amenity and contributes to the character of the area (CS17, AL2).
4. The intensification of development is detrimental to the rural setting of the Listed Building (CS11, CS16).
5. The quality of the housing design is extremely poor and detrimental to the setting of the Listed Building (CS11, CS16).
6. The development still has an overbearing on the Listed Building when viewed by its neighbours (SPG)
7. The pattern of development is not in keeping with prevailing mixture of historic buildings and 20c bungalows / character of Stoke (ribbon development) (CS17, CS11, CS16)
8. This location is not considered sustainable with enough primary facilities within safe walking distance (CS17, AL2).
9. The access driveway is inconsiderate and has a detrimental effect on Clarence Terrace and the setting of the listed building (DM11)
10. The access road cannot fulfil the traffic design criteria for safe access (DM11).
11. The rear garden of 72 was until recently part of the rural landscape and should not be considered suitable for extension of the urban boundary (CS17, AL2)
12. The proposals risk the loss or damage to trees (CS11)

13. The proposals do not quantify the potential harm to the local biodiversity or the potential for nesting sites (CS11)

Policy Contraventions

CS17 Concentration and Distribution of Development within the Urban Areas Development will be permitted that makes the most effective use of land in the borough by granting planning permission that:

1. Concentrates new housing, employment, retail, leisure and other development within the five urban areas of Havant, Leigh Park, Waterloo, Emsworth and Hayling Island, as shown on the Proposals Map.

Whilst the site falls within the development boundary or “Urban” area of Stoke by virtue of adjacency, the site is on the very edge of the policy boundary and comprises previously “non-urban” (rural) land to the rear of No. 72. The single proposed house now sits incongruously beyond the rear building line of any of its neighbours almost at sea in the field. Where the previous scheme swamped the farm buildings, this single unit stands out as the building now most connected with the rural setting, still alienating the farmhouse from its origins. Its very essence as a farm house and converted barn is rural and should be preserved in its rural form and context.

The garden setting of No. 70 and No. 72. makes a positive contribution to the rural character of Stoke by creating a soft transition between the urban and rural edges. It is also a key part of the setting of the listed building with the mature gardens providing much required separation from the character of the adjacent 20th Century development.

The Planning Inspector reinforced this point stating that the gap to No. 78 “helps to give No 70 some ‘breathing space’ and something of a standalone appearance from built development that is not historically related to the position of the former farmstead. Consequently, it makes an important contribution to the setting of the listed building and the way it is perceived from the public realm. Currently therefore, the appeal site makes a positive contribution to the significance of the heritage asset.

2. Prioritises development on previously developed land, including redundant, derelict or underused land and buildings within the urban area.

The NPPF clearly states that gardens associated to residential properties are not “brownfield” or previously developed land. Whilst the garden grabbing moniker has fallen away from common parlance we understand that development in gardens may only gain approval if it is not detrimental to the character of the area or the residential amenity of the existing properties – this scheme fails to make any positive contribution.

3. Broadly distributes the new housing and employment development in the five areas of the borough as indicated on the Spatial Distribution Map (Key Diagram). Development in the non-urban areas will only be permitted if it is consistent with the policies for the countryside set out in national policy

If the LPA agree with our position that the site should be considered quasi-rural or only urban by proximity then any potential development should be consistent with the very stringent national countryside policies.

AL2 2.05 The principle of concentrating development within the urban areas was established in Policy CS17 of the Core Strategy. This assists in urban regeneration by encouraging the recycling of derelict and other previously-developed (‘brownfield’) land. It also allows new residents and businesses to

access existing facilities within the urban area while protecting the undeveloped gaps between settlements.

There is no other evidence of any other previous development on these two plots and it should be acknowledged that up until the conversion of the barn in 1993, the gardens proposed for development was formally part of the farmland outside of the current development boundary. It is this sort of urban creep and land grabbing that much of the rural protection policies are designed to limit.

This small area of Stoke is not laden with a large number of existing facilities. Stoke Farm Shop, Stoke Post Office and The Yew Tree Inn offer basic provisions at best but are besieged by the tortuous act of trying to find a safe point to cross the very busy Havant Road. This small handful of facilities does not sustain the current community let alone form ongoing sustainable development. Shopping, school runs, commuting, family activities and so on will all rely on a car journey which places reliance on additional car movements onto Havant Road (see below).

It could be argued that this site is well served by the local bus route, however, this also involves finding a safe place to cross Havant Road. We can testify this is treacherous at busy times as an adult, however we do this regularly with our baby buggy or with the dog on a lead and it relies heavily on the good will of the traffic rather than effective and sustainable highway planning.

2.08 The gaps are an integral part of land use patterns in the Borough. They are an important part of settlement identity and help prevent urban areas of Havant Borough and neighbouring districts merging together and losing their separate identities. They need to be valued, not merely as passive landscape features retaining open land adjacent to urban areas, but also as having potential for new or enhanced recreation opportunities. Unplanned degradation or development on or into such gaps can potentially have a detrimental impact on sense of place and the ability to feel part of a defined community.

It is appreciated that the extent of this site is within the development boundary by virtue of being a large garden, however, the character of No. 70 and No. 72 is that they are unique amongst their neighbours and separated from the ribbon development of houses to the north. This breaks down the intensity of the urban grain before opening on to farmland. To perpetually infill urban areas and create a black and white divide between urban and rural boundaries is a poor approach to place making.

The gaps within the urban boundary should be valued where they offer character and amenity value to the local environs, enhance the connection to the rural landscape and, in this instance, protect the character and setting of the listed property and its associated barn conversion.

2.09 Applications to develop land located within an undeveloped gap between settlements will need to demonstrate clearly that the proposal will maintain the separate identity of the relevant urban areas and not diminish it. The only exception to this is an overriding public need or interest that cannot be accommodated elsewhere in the Borough. Small scale householder development will be permitted subject to all other Local Plan policies

The housing identity in Stoke is varied. The handful of beautiful listed buildings offer an informal "promenade architecturale" for those driving along the S bends of Havant Road. These are interspersed with low level bungalows and a few 1930s properties which all sit back a long way back from the kerb and remain subservient to these key, high quality buildings.

The variation in building style from the previous scheme is a step in the right direction, but the execution of a pastiche brick barn is very poor. It does little to complement the identity of the farm buildings.

AL3 2.10 Land outside the urban area on Hayling Island is defined as 'non-urban' and is not undeveloped gap for the purpose of this policy. All development proposals for this non-urban land will need to comply with Government policy on rural areas, as set out in the NPPF.

Our consideration here is that this site immediately bounds the non-urban area, which is of significant importance. Any development immediately bordering the non-urban area should bear similar scrutiny of that within a non-urban area to ensure that adverse impact are avoided. These Government policies on Rural areas focus on exemplary design, which again this scheme is not.

Havant Borough Council's own inclusion of this paragraph in the Local Plan serves to demonstrate that there is desire to protect and enhance the special character with high quality development – which this scheme falls significantly short of.

Policy CS11 Protecting and Enhancing the Special Environment and Heritage of Havant Borough states that statutory and non statutory designations should be used to manage development in or adjacent to listed buildings.

Policy CS16 High Quality Design provides design criteria for new development, including that which affects a listed building.

As outlined in the previous paragraph and the appeal decision, the setting of this listed building is vitally important. We questioned whether any development should take place in the grounds of a listed building in our response to the previous applications. This was echoed by the Conservation Officer who acknowledged that *"It is important that the sense of isolation from the surrounding urban expansion is retained. It should not be consumed by the expanding back land development and needs to retain its agricultural setting and changes and respect the key aspects of the unaltered plan form"*. We feel that the only way to maintain this isolation is to prevent any development of the backland at all.

There is an attempt here to draw upon the quality of the Barn property at No. 72 however the execution is of poor quality.

- The scheme appears devoid of embellishment, flare or attention to detail potentially due to the method of 3D drafting.
- The house has been based around a double height entrance space at the expense of practical space in other rooms. Around 30% of the floor area is attributed to the entrance and void.
- 3 of the four bedrooms are served only by small rooflights
- There is no natural light serving the family bathroom or en-suite
- The openings in the rear of the building serving the open garden and aspect on to the field are generally small, casement openings that have been potato stamped around the perimeter. The French doors are a positive but not reflective of current design trends.
- The clunky deep eaves are more typical of developer houses.
- Utility room takes up position on one of the prime garden elevations, whilst the lounge addresses the large driveway through narrow slot windows.
- The room in the roof arrangements severely restrict the 3 secondary bedrooms.

- The swathes of brick may reflect No. 70 and 72, however new brickwork rarely exudes the character of historic brickwork, especially in this quantity. The historic buildings plus their outbuildings may be better served by a complimentary but contrasting timber barn-like building rather than swathes of new brick.
- There is no front door.
- The gardens are to be enclosed with Close boarded timber fences the lowest common denominator in garden separation and does nothing to enhance the setting of the Listed Building or the adjacent barn.

DM11 - The council will seek to ensure that every opportunity is taken to increase integration of sustainable travel modes and availability of non-motorised modes by appropriate measures including:

1. Securing on-site and/or off-site interventions that promote integrated travel and access by non-motorised modes.

As outlined previously, the location of these houses relies on motorised transport for most domestic journeys due to the lack of sustainable infrastructure nearby. This site is inherently unsustainable.

3. Securing appropriate improvements to public and community transport (including infrastructure requirements) in accordance with the Hampshire Local Transport Plan and (where applicable) the relevant sub-regional transport strategy.

If an approval is forthcoming, we suggest that CIL contributions should directly fund continuation of the footpath to the west of Havant Road, south of the site and a suitable crossing to promote safe pedestrian movement near the Yew Tree Inn / Daw Lane by means of a Section 278 agreement, with these works complete PRIOR to the proposed development being commenced. The CIL payments have been outlined in the application and it is questionable whether a single house development would generate a significant contribution to the local infrastructure.

4. Proposals for reducing opportunities for informal parking in the area surrounding the development where this would impact on the capacity, operation and safety of the local highway network and/or the amenity of the locality.

Parking is self-contained within the scheme, although the applicant fails to demonstrate how. It has not been demonstrated as to whether the large parking area is sufficient to provide turning for delivery vehicles to enter and leave in a forward gear. The Building Control Officer has noted that access for fire tenders is too restricted, which puts pressure on the applicant to increase the hardstanding area and further impact the setting of the listed buildings.

5. Ensuring that new developments are located and designed at the outset to encourage lower vehicle speeds and safe, permeable, inclusive layouts that integrate with existing pedestrian, cycle and public transport routes. This will facilitate and encourage short distance trips by cycle and walking, including to public transport interchanges.

Safety here is questionable; these bends are an accident blackspot. I previously stated that the short time we had lived here we have known several cars to have accidents in this stretch of road. Since the last application we have witnessed 7 further accidents on these bends. The most notable was the one pictured below which occurred at the entrance to the proposed scheme and finished a few meters down the road.



Most accidents have occurred in poor weather and introducing a new entrance on to Havant Road which may promote hard braking events on the bend is irresponsible at best.

It is unfortunate that the recently imposed 30mph speed limit on Havant Road is not observed or enforced. Vehicle speeds through the S bends are often in excess of 30mph as drivers frequently test the performance of their cars or motorbikes through these corners or accelerate away from the West Lane junction. In addition, as this is the only road into Hayling Island it carries all of the HGV traffic, busses and emergency vehicles which either travel a greater speeds or have longer stopping distances (as discussed under trunk roads in MfS2).

The quoted northwards sightline has been measured incorrectly – it is clearly stated in the Manual for Streets that the sightlines should be measured to the near kerb and for a Major Road at with a 50kph (30mph) speed limit, the upper percentile measurement of 37mph should be used (see Manual for Streets 2). The resulting Stopping Sight Distance (SSD) is 56m which cannot be achieved on highways land - it is obscured by the next listed property along and the immediate neighbours fence (see attached sketch).

The southward visibility splay has also been incorrectly measured (again, this should go to the nearside kerb as there is no central reservation) and cannot be achieved without removing the hedge to No. 70, a position which cannot be guaranteed in perpetuity should ownership of No. 70 change.

The applicant has focused on the visibility from the site, yet no mention has been made of cars travelling northwards wishing to turn across the carriageway into the site. If travelling northwards and waiting, forward visibility is limited due to the S bend and the high boundary treatments to the west of the carriageway. Travelling southwards, it is likely that waiting cars about to cross the carriageway would be obscured by other vehicles travelling north. To reiterate, our opinion is that introducing vehicles wishing to cross the flow of traffic at an accident blackspot is ridiculous.

No junction design has been provided. A 6m radius would ensure that vehicles leaving the site and travelling south do not need to cross the opposite carriageway, but would further impact on the listed property.

No proposal have been provided for the existing street furniture, etc. It is clear in this application that the "bend approaching" safety signage will need to be relocated into a position that still remains in a prominent location whilst not limiting visibility from the scheme. Telegraph poles and street lighting all contribute to blocking the sightlines north and south. The hedge bounding No.70 is only cut outside of the bird nesting season, consummate with environmental protection measures in the non-urban area and causes a visual obstruction during the summer months.

Finally, all cars leaving the site directly face the principle living rooms of No. 103 and 105 Havant Road. With long waiting times to cross Havant Road this amounts to a significant loss of privacy and loss of amenity with car headlights aimed straight at the houses.

The applicant states that the access arrangements have been approved by virtue of the feedback previously, which is incorrect and disingenuous.

Housing SPD.

Development of backland and infill sites should not have an adverse effect on neighbouring properties, should maintain and enhance the existing character and quality of an existing area and should create pleasant and attractive places to live.

Design

I've noted concerns relating to the quality of design above. The designer does not annotate the height at which the cut is taken through the roof plane. If this is at 1.2m above FFL then the quoted useable floor areas should be expected to be reduced by up to 25%, which would be a significant problem in the bathrooms and end bedrooms.

While the overall floor area meets the requirement of a 4 bedroom house (>100m²) the three secondary bedrooms will all individually fall below the floor area standards and quality requirements of the HA HQI standards, as required by the Havant SPG for Housing, once the reduced head height is considered.

The SPG also states a minimum area for a double garage at 6x6 m (36m²), which this scheme does not achieve. The garage is shown with a cavity wall which might suggest future conversion is being considered to add accommodation.

Permeable paving has been proposed, however is widely understood to have reduced effectiveness in downpours and is proven to become blocked in the course of time, putting a burden back onto the existing surface water system. It is already the case that the existing surface water drainage on Havant Road is laden with silt from adjacent fields (which does little to aids SUDS) and we have witnessed standing water rainwater collecting at the kerb and overlapping the footpath and into our front garden during intense rainfall.

The council engineer suggests that the site should discharge into the adjacent ditch. At this time of year that ditch is full and is simply discharging onto Castlemans Lane (this is currently evident) and onwards into the highways surface drainage. The introduction of new hardstanding and roofscape will only exacerbate this issue during peak rainfall.

Ecology and Environmental

This still seems to be completely ignored by the applicant, save for their statement that no trees are affected – not even the one that needs to make way for the access.

The north and east boundaries are tree lined and House is still proposed to be built in close proximity. If the LPA consider any form of development likely then a full tree survey must be submitted with associated RPZ enforced.

The adjacent field is identified as "uncertain sites Brent Geese and / or Waders" and this has not been acknowledged. We would expect maintaining the garden of 72 as a green belt would avoid harm to potential nesting sites.

The proximity of the field and drainage ditch should give some concern that there are newts, frogs, voles, field mice as well as nesting birds and hedgerow species that will be affected by the scheme. The site is in a rural setting after all!

Little is made of the fact that they are removing a section of the front hedge but the applicant also fails to mention this includes the removal of a tree to facilitate access. Whilst a tree survey may prove this to be a low category tree, it contributes to the character of the area.

Planning Inspectors Comments

The Planning Inspectors comments on the previous scheme offer commentary on the site that has done little suggest that any form of development would be worthy of approval. They have stated that new development would *"would erode the existing relatively open character of the site by the introduction of significant new built form. In my view, this would harm the setting of the nearby listed buildings, particularly No 70, and detract from their significance and the character and appearance of the local area generally"*

It would also conflict with Policy CS11 of the CS, which seeks to ensure that development would protect and enhance the special environment and heritage of the borough, including statutory heritage designations such as listed buildings".

The Inspector all but denounces any development by stating that *"The proposal would also be generally inconsistent with the adopted Havant Borough Design Guide Supplementary Planning Document (SPD) 2011, which among other things advises that backland and infill sites should maintain and enhance the existing character and quality of the area, and that such development should be subservient to the frontage property."* Prior to which they emphasis that the character *"is a modest, mainly residential linear settlement set along both sides of Havant Road. Houses are mixed in size, type and age, but are principally traditional in character and appearance and face onto the road."* Arguably, you cannot maintain the frontage nature of the settlement by locating a subservient house in a back land location in order to minimise the effect on the frontage development.

Housekeeping Items.

- There are limited survey drawings, no finish floor levels, street elevations or site sections submitted with the application. Building Heights are not given.
- The garden of no. 72 also appears to contribute significantly to the site development area. This is inadequately referenced in the application title (it should refer to both properties) and may need to evidence the notices and / or blue site boundary line.
- There is no Blue Site Boundary line
- The red line should include the highway section required for access and a junction design should be proposed.

- The application form states it is not within 20m of a water course. There is a land drain running along from this site to Castlemans Lane. This already overflows in winter and floods the lane.
- Biodiversity and Geological Conservation should be ticked yes to the first two boxes.
- Trees and Hedges should be ticked yes in box 2

I trust that you will take our concerns into consideration. Should you wish to view the proposed site from our property, we would be more than happy to facilitate this.

Yours sincerely,

Andy Young + Nicola Crowson.