55562/005 - Development Land East of Horndean, Rowlands Castle Road, Horndean, Waterlooville
SECTION 1 – SCHEDULE OF APPLICATION RECOMMENDATIONS

Item No.: 01

The information, recommendations, and advice contained in this report are correct as at the date of preparation, which is more than one week in advance of the Committee meeting. Because of the time constraints some reports may have been prepared in advance of the final date given for consultee responses or neighbour comments. Any changes or necessary updates to the report will be made orally at the Committee meeting.
PROPOSAL
Outline planning application with all matters reserved, except the means of access to the highway network (junction arrangements) and associated highway improvements, for the demolition of existing buildings and the residential-led (C3) mixed-use development of the site with up to 800 dwellings, up to 2ha of employment land (uses B1 and B2), a Local Centre (including: local retail (food and non-food A1); financial and professional services (A2); restaurants, cafés, and drinking establishments (A3 and A4), hot food takeaways (A5), together with a primary school (D1) and community facilities (D2)), informal and formal open space, allotments, and acoustic bunds, together with associated drainage, utilities and all other associated and necessary infrastructure (additional information and amended plans received 31/07/19, 06/09/19, 26/09/19, 21/10/19, 04/03/20, and 04/05/20)

LOCATION: Development Land East of Horndean, Rowlands Castle Road, Horndean, Waterlooville

REFERENCE 55562/005 PARISH: Horndean
APPLICANT: Bloor Homes Limited
CONSULTATION EXPIRY: 26 March 2020
APPLICATION EXPIRY: 14 March 2019
COUNCILLOR(S): Councillor D E Evans, Councillor C D J Hatter
SUMMARY RECOMMENDATION: Outline Permission

This application is included on the agenda at the discretion of the Director of Regeneration and Place.

Site and Development

Site

The application site consists of two of three parcels of land located between the A3 (M) and the South Downs National Park, which together form site allocation HN1 of the adopted EHDC Local Plan: Housing and Employment Land Allocations (2016).

The third, northern parcel is immediately to the north of Rowlands Castle Road. It is open arable land and shares a boundary with the settlement of Horndean to the south-west. There are two belts of trees running parallel to each other on the eastern side of the site. This parcel does not form part of this application and is subject of current applications 55562/006, 55562/007, and 55562/008, which are still under consideration.
The central parcel, which is subject of this application, lies between Rowlands Castle Road to the north and the B2149 Havant Road to the south and is open arable land, with a belt of trees running east to west at the southern end of the parcel. It shares a boundary with the settlement of Horndean on its western side and Pyle Lane on its eastern side.

The southern parcel, also subject of this application, lies between the A3 (M) and B2149. The northern boundary abuts the settlement of Horndean. There is an area of woodland between the application site and the A3 (M) with two other areas of woodland within the site. The land consists predominantly of open arable/pasture land.

The total area of the application site is approximately 55ha.

The South Downs National Park (SDNP) is located to the north-east of the application site, on the opposite side of Pyle Lane.

**Proposal**

This application seeks outline consent for the following works, with access being the only matter for detailed consideration. Should this application be approved, detailed matters of appearance, scale, layout, and landscaping would be considered as part any subsequent ‘reserved matters’ applications.

- Residential development for a maximum of 800 dwellings.
- Employment land (B1 and B2 uses) totalling up to 2ha located on the northern edge of land south-east of Havant Road.
- Land for a mixed use local centre which would include retail (A1), financial and professional services (A2), restaurants, cafés and drinking establishments (A3 and A4), hot food takeaway (A5) units, and a community building (D1 and D2).
- 1.2ha of land for a new 1 form (210 pupil) entry primary school with potential for expansion to 1.5FE
- Early years provision

Open space totalling approximately 23ha to include:

- Sports pitch
- Allotments
- Childrens’ play spaces
- Informal open spaces such as parkland, woodland (which will be accessible subject to ecological constraints) and grassland areas
- Network of green infrastructure, including footpaths and cycleways
- Land for skate park
- Trim trail
Additional woodland planting

Highway works consisting of:

- Junction 2 A3(M) signalised crossings and cycle scheme which connects to existing provision at the Lakesmere Road/B2149 junction, as shown on drawing VD18678/100-02 Rev G

- Improvements to the Havant Road/Dell Piece Roundabout as shown on drawing VD18678/100-03 Rev F and associated footway/cycleway works

- Three new accesses onto B2149 as shown on drawing VD18678/100-04 Rev G, VD18678/100-05 Rev G, VD18678/100-06 Rev G and associated footway/cycleway works

- New access onto Pyle Lane as shown on drawing VD18678/100-05 Rev G

- New bus only access onto Rowlands Castle Road, as shown on drawing VD18678/100-07 Rev C and associated footway works

- A new shared use footway/cycleway on the southern/western side of the B2149 Dell Piece East/Havant Road along the length of the site frontage. This is proposed in the form of a 3m wide facility with a 1m landscape strip

- Toucan crossing facilities where the footway/cycleway meets Junction 2 of the A2 (M) as shown on drawing VD18678/100-02 Rev G

- Footway provision on the north/eastern side of Havant Road across the site frontage from the new site access roundabout to the roundabout with Dell Piece East as shown on drawing VD18678/100-01 Rev J

- Two new signal controlled crossing facilities on Havant Road (250m north of the proposed new access roundabout and immediately south of the proposed access roundabout) as shown on drawing VD18678/100-01 Rev J

The proposed development was screened and found to fall within Schedule 2 Development of the Environmental Impact Assessment regulations and required an Environmental Statement to be submitted with the application due to the size of the development and its proximity to the protected landscape of the SDNP.

The application is supported by the following documents:

RG- M_01 rev F - Site location plan
RG -M- 22 rev G - Land use and access parameter plan
RG-M-23 rev F - Trees and buildings parameter plan
VD18678-100- 01J - General Arrangement sheet 1 of 7
Application Form
CIL Form Assumption of Liability
Ground Condition Assessment and Ground Investigation Report
Agricultural Land Classification and Soil Resources
Review of Minerals Safeguarding
Information for Habitats Regulations Assessment
Sustainability Statement
Arboricultural Impact Assessment & Tree Report
Utilities Assessment
Planning Supporting Statement
Statement of Community Involvement
Design and Access Statement
Environmental Statement Volume 1 of 4
Environmental Statement Volume 2 of 4
Environmental Statement Volume 3 of 4
Environmental Statement Volume 4 of 4
Factual Report
01HX01 sheet 1 of 9 - Site Survey
01HX01 sheet 2 of 9 - Site Survey
01HX01 sheet 3 of 9 - Site Survey
01HX01 sheet 4 of 9 - Site Survey
01HX01 sheet 5 of 9 - Site Survey
01HX01 sheet 6 of 9 - Site Survey
01HX01 sheet 7 of 9 - Site Survey
01HX01 sheet 8 of 9 - Site Survey
01HX01 sheet 9 of 9 - Site Survey
01HX02 - Site Survey
BL021984-01 Sheet 1 of 15 - Tree Reference Plan
BL021984-01 Sheet 2 of 15 - Tree Reference Plan
BL021984-01 Sheet 3 of 15 - Tree Reference Plan
BL021984-01 Sheet 4 of 15 - Tree Reference Plan
BL021984-01 Sheet 5 of 15 - Tree Reference Plan
BL021984-01 Sheet 6 of 15 - Tree Reference Plan
BL021984-01 Sheet 7 of 15 - Tree Reference Plan
BL021984-01 Sheet 8 of 15 - Tree Reference Plan
BL021984-01 Sheet 9 of 15 - Tree Reference Plan
BL021984-01 Sheet 10 of 15 - Tree Reference Plan
BL021984-01 Sheet 11 of 15 - Tree Reference Plan
BL021984-01 Sheet 12 of 15 - Tree Reference Plan
BL021984-01 Sheet 13 of 15 - Tree Reference Plan
Technical Response to Ecology Consultees (July 2019) by Ecological Planning and Research Ltd
Post-Application Technical Submission by White Peak Planning Ltd (July 2019)
Further Post-Application Response to Issues Raised by Consultees by Terence O’Rourke Ltd (February 2020)

Some of these documents have been amended or up-dated since submission to clarify matters raised by officers and consultees.

Designations/constraints

The site is outside of, but directly adjacent to, the Settlement Policy Boundary (SPB) for Horndean, as identified in the East Hampshire District Local Plan: Second Review (Local Plan).

The application site comprises two of the three parcels of land forming the allocated ‘HN1’ ‘Land East of Horndean’ (LEoH) site within the adopted EHDC Local Plan: Housing and Employment Land Allocations (2016). The complete LEoH site has been allocated for the following development:

- About 700 new dwellings
- Care Village including independent living units
- 2ha industrial (B2) and business use (B1)
- New school and land for expansion

The above would be provided with the associated parking, landscaping, and infrastructure.

This application proposes up to 800 new dwellings, 2ha of B1 and B2 use employment land, and land for a new school, with the potential to expand. The remaining, northern most parcel of the site allocation, is subject of three current applications (55562/006, 007, and 008) which propose 85 age restricted dwellings and open space, a 60-bed care home and up to 69 no. extra care bungalows, and a 60 bed Care Home with village care centre (VCC) incorporating up to 60 no. care-assisted living apartments and up to 60 no. extra care units, respectively.

The site is not subject to any national landscape designations and is located outside of the South Downs National Park. The park boundary does, however, lie directly adjacent to the eastern boundary of the site. This is a Category V Protected Landscape by the World Conservation Union. Hazelton Common lies to the west of the A3(M), this is a designated local nature reserve and SINC.

The site comprises agricultural land which has been categorised as falling within DEFRA Grade 3b (moderate quality).
Blendworth and Horndean Conservation Areas lie outside of, but to the north of, the application site some distance away. In addition, there are the following listed buildings close to the site:

- Pyle Farm (Grade II)
- Hook Cottage (Grade II)

There is also a historic hedgerow on the north-west of the site, together with some archaeological interest in and around the site. Land north of Rowlands Castle Road includes part of the parkland associated with Blendworth Lodge and Cadlington House. The Registered Parks and Gardens of Stanstead Park and Leigh Park are located to the south and east of the application site, but again are some distance away.

There are no designated ecological areas within the site. However, the application site has ecological interest in that there is a significant population of Bechstein’s Bats, dormice within the hedgerows and woodland in the area to the south-west of Havant Road, a small population of reptiles on the land to the south-west and north-east of Havant Road and notable breeding birds and invertebrate species across the site. Bechstein bats are a Habitats Directive Annex II species. Dormice are a European protected Species.

There are four tree preservation orders (TPO) that affect the site.

There are several public rights of way on site and in the locality. They include Broad Walk, a public footpath running from Rowlands Castle, through the National Park and woodland known as ‘The Holt’ across Soakfield Row and into the built-up part of Horndean. There is a bridleway along the western edge of the site, parallel with the A3(M). This crosses over the motorway via the footbridge in the southwest corner of the site, before running down Sheepwash Lane and northwards through Hazleton Common Nature Reserve.

The site lies within Flood Risk Zone 1. It also lies within a Groundwater Source Protection Zone 1.

A high pressure gas pipeline runs approximately south west – north east across the entire site. On the land north of Havant Road there is a second gas pipeline which runs approximately east – west to connect with the north-south pipeline at the pressure reduction station. A gas distribution station adjoins the site, within Soakfield Row. In addition, there is a mixture of grounded and overhead 11kV electricity cables that cross the site. An underground oil-filled 132kV cable run crosses the site in the south west corner.

The application is located close to the A3(M), which is managed and maintained by Highways England.
The Proposal

The application seeks outline permission for a residential development of up to 800 dwellings, together with employment uses, community facilities, open space, landscaping and highway works. Access and the associated off-site highway improvements are the only matters for detailed consideration at this stage, with appearance, layout, scale and landscaping to be fixed through the submission of reserved matters applications.

This application follows the now elapsed outline consent, granted in 2016, for a residential development of up to 700 dwellings, together with employment uses, community facilities, open space, landscaping, access and associated off-site highway improvements.

Members are asked to note that this current scheme is broadly similar to the elapsed scheme aside from the following:

- Increase in number of dwellings proposed by 100
- Additional 0.3ha of employment space proposed
- One additional access to the southern parcel off Havant Road
- Relocation of the community building, sports pitch, school, and local centre, to the centre of the site as opposed to their previous outline scheme location adjacent to the employment land in the north west part of the southern parcel
- Relocation of the allotments from the southern to the northern parcel

An Illustrative Masterplan and other supporting information have been submitted in support of the application, which shows provision for up to 800 dwellings.

The application is for up to 800 dwellings assuming a residential area of 20.77 hectares, would result in an average density of approximately 39 dwellings per hectare (dph) compared the maximum 35 dph of the previous outline consent. The development would include different densities across the site, reflecting the characteristics of adjoining land. It is proposed that there would be a lower density and appropriate built form along the northeast boundary next to the South Downs National Park. This would create a more gradual transition with the adjoining landscape. Densities would be higher within and around the local centre, and along the main spine road. A variation in densities across a site is good practice and aids with site legibility and place making.

The majority of the development would be 2 - 2.5 storeys. The exceptions would around the local centre and along the main spine which would be up to 3 storey in height where appropriate. The heights of the school, community building, and employment buildings would be up to 2-3 storeys.
Access would be from Havant Road, with an access to the north from Rowlands Castle Road being restricted to bus, cyclists and pedestrians only.

As per the lapsed outline consent, the employment would be adjacent to Dell Piece East and would be served by a dedicated, newly installed, fifth arm to the Dell Piece East roundabout.

The community building, retail uses, school, and sports pitch would now be located centrally within the site, creating a ‘hub’ equally accessible to residents in both the northern and southern parcels. The access to the northern and southern parcels would be off a proposed roundabout within Havant Road. The southern parcel would include two additional accesses off Havant Road (one to north and one to the south of the roundabout) with ‘ghost islands’ and the northern parcel would include a minor access off Pyle Lane, that would serve a small cul-de-sac of dwellings only.

Associated cycle and pedestrian walkways, crossings, and traffic calming measures are proposed along the length of the site along Havant Road.

The main areas of open space would be along the boundary with the A3(M), the centre and south-western area of the southern block. An area along the centre of the site, north of Havant Road, would be retained as landscaping.

Allotments would be provided in the northern part of the site adjoining the properties at Idsworth Close.

Over 23ha of open space would be provided within the site and which would comprise a mixture of natural and semi-natural areas, park, formal and informal open space, woodland areas (which would accessible subject to ecological constraints), trees, watercourses, attenuation basins and other designed sustainable drainage features. Equipped childrens’ play areas, and a trim trail, would be provided at various parts of the development in a number and manner to be agreed at the reserved matters stage.

The scheme proposes 40% affordable housing. The mix has not been finalised yet but would be expected to comprise 70% affordable/social rent and 30% intermediate tenure.

**Relevant Planning History**

55562/001 - Outline planning application with all matters reserved (except for access to the highway network and associated off-site highway improvements) for the demolition of existing buildings and the development of a maximum of 700 dwellings, approximately 1.7 Ha of employment land, a Local Centre (including local retail, a primary school and community facilities), a Care Village, playing pitches, a cricket pavilion (including associated access and parking), allotments (including associated building and car parking), acoustic bunds and ecological buffers together with internal access network (including footpaths and cycleways), drainage works, associated landscaping and open space (including play areas) – Outline Consent (05/02/16)
Other applications within the allocated site but outside of the planning application site

**Land north of Rowlands Castle Road**

55562/006 - Outline Application - Development for up to 85 age restricted dwellings (aged 55 years and above) with associated infrastructure, formal and informal open space and access from Rowlands Castle Road following the demolition of all buildings and removal of hardstanding (Access to be considered in detail) (Amended plans and additional information received 30/10/19, 03/12/19 &17/01/20) – Pending consideration

55562/007 - Outline application - Development of a care village comprising a 60-bed care home, a village care centre (VCC) incorporating up to 60 no. care-assisted living apartments and up to 60 no. extra care units comprising bungalows and apartments, with associated parking, landscaping and sustainable drainage (with all matters reserved) – Pending consideration

55562/008 - Outline planning application for the development of a 60-bed care home and up to 69 no. extra care bungalows and apartments with associated parking, landscaping and sustainable drainage (with all matters reserved) – Pending consideration

Note: Planning applications 55562/007 and 008 are alternative proposals for the same planning application site.

**Development Plan Policies and Proposals**

East Hampshire District Local Plan: Joint Core Strategy (2014)

<table>
<thead>
<tr>
<th>CP1</th>
<th>Presumption in favour of sustainable development</th>
</tr>
</thead>
<tbody>
<tr>
<td>CP2</td>
<td>Spatial Strategy</td>
</tr>
<tr>
<td>CP3</td>
<td>New employment provision</td>
</tr>
<tr>
<td>CP5</td>
<td>Employment and workforce skills</td>
</tr>
<tr>
<td>CP10</td>
<td>Spatial strategy for housing</td>
</tr>
<tr>
<td>CP11</td>
<td>Housing tenure, type and mix</td>
</tr>
<tr>
<td>CP13</td>
<td>Affordable housing on residential development sites</td>
</tr>
<tr>
<td>CP16</td>
<td>Protection and provision of social infrastructure</td>
</tr>
<tr>
<td>CP18</td>
<td>Provision of open space, sport and recreation and built facilities</td>
</tr>
<tr>
<td>CP19</td>
<td>Development in the countryside</td>
</tr>
<tr>
<td>CP20</td>
<td>Landscape</td>
</tr>
<tr>
<td>CP21</td>
<td>Biodiversity</td>
</tr>
<tr>
<td>CP24</td>
<td>Sustainable construction</td>
</tr>
<tr>
<td>CP25</td>
<td>Flood Risk</td>
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<tr>
<td>CP26</td>
<td>Water resources/ water quality</td>
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<td>CP27</td>
<td>Pollution</td>
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<tr>
<td>CP28</td>
<td>Green Infrastructure</td>
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<tr>
<td>CP29</td>
<td>Design</td>
</tr>
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<td>CP31</td>
<td>Transport</td>
</tr>
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**Save East Hampshire Local Plan: Second Review (2006)**

- T2 – Public transport provision and improvement
- T3 - Pedestrians and Cyclists
- T4 - Protection of Public Footpaths
- HE12 – Development affecting the setting of a Listed Building
- HE17 - Archaeological & Ancient Monuments
- P7 - Contaminated Land
- C6 - Tree Preservation
- HC2 – Provision of facilities and services with new development
- HC3 – Public services, community, cultural, leisure and sport facilities

**East Hampshire District Local Plan: Housing and Employment Allocations (2016)**

The Local Plan (Part 2): Housing and Employment Allocations (Site Allocations Plan) was formally adopted on the 8th April 2016. Its primary purpose is to identify specific sites to meet the individual housing and employment targets set out in policies CP2, CP3, and CP10 of the Joint Core Strategy (JCS), and to set out guidance for the development of these sites.

The Site Allocations Plan forms part of the Development Plan, in addition to the Joint Core Strategy (2014), saved policies of the Local Plan: Second Review (2006), and adopted Neighbourhood Plans.

The site forms an allocation ‘HN1’ within the Site Allocations Plan for the following:

- About 700 dwellings
- Extra care provision for the elderly
- Land for about 2ha industrial (B2) and business (B1)
- New school and land for expansion.

The proposals provide the key requirements set out in HN1 with the exception of the care village, which is proposed to be provided on land north of this application. A range of criteria are set out under Policy HN1. These are considered below but it is considered that the planning application broadly complies with relevant criteria subject to the imposition of appropriate conditions, the agreement of details to be set out in the Section 106 and the provision of appropriate details at reserved matters.
East Hampshire Five Year Housing Land Supply Position Statement, July 2019 (For the period 2019/20 to 2023/24)

This report updates the Council's five year supply position in light of more recent housing commitments and completion data. As of 1st April 2019, East Hampshire District Council (outside of the SDNP) has 5.87 year supply and a surplus of 469 dwellings once an additional 5% buffer has been taken into account to ensure choice and competition in the market for land.

EHDC Planning Contributions and Community Infrastructure Levy - SPD (2016)

This document sets the council’s approach to delivering infrastructure associated with new development following the introduction of CIL charging on the 8th April 2016 in the part of East Hampshire District that is located outside of the South Downs National Park.

Horndean Parish Village Design Statement

Horndean Parish Village Design Statement is non-statutory planning guidance that has been the subject of public consultation and therefore is a material planning consideration.

Planning Policy Constraints and Guidance

National Planning Policy Framework (NPPF)

The NPPF states that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The following sections of the NPPF are considered to be particularly relevant to the consideration of this application;
2. Achieving sustainable development
4. Decision-making
5. Delivering a sufficient supply of homes
6. Building a strong, competitive economy
8. Promoting healthy and safe communities
9. Promoting sustainable transport
11. Making effective use of land
12. Achieving well-designed places
14. Meeting the challenge of climate change, flooding and coastal change
15. Conserving and enhancing the natural environment
16. Conserving and enhancing the historic environment

National Planning Practice Guidance

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)

Consultations and Town/Parish Council comments

A full transcript of these comments can be seen at Appendix 1.

Highways England – No objection subject to a condition being attached to any approval requiring that prior to first occupation of development hereby permitted, the proposed northern route around the A3(M) Junction 2 roundabout (as per drawing VD18678-100-02D) should be constructed and open to the public to ensure there is a sustainable route to Horndean at all times from the development.

Environment Agency – No objection subject to conditions in respect of the following being attached any approval:

- Submission to the LPA for approval of a scheme for surface water disposal,
- Submission to the LPA for approval of a scheme for the disposal of foul water,
- Submission to the LPA of a Remediation Strategy, verification report,
- Submission to the LPA of a remediation strategy for unidentified contamination found during development,
- That no piling or deep foundations are used,
- Submission to the LPA for approval of proposed below ground engineering,
- Submission to the LPA for approval of details of any facilities for the storage of oils, fuels or chemicals associated with this development.
• That no underground storage facilities and/or distribution infrastructure for hazardous substances (such as hydrocarbons) shall be constructed at the site.

• That no underground storage facilities, pumping and/or distribution infrastructure for non-hazardous polluting substances (such as sewage) shall only be constructed at the site without prior approval from the LPA

• Submission to the LPA for approval of details of the disposal of foul water for that phase

• That no building or structure, including drainage infrastructure and utility trenches shall be located within a 10m stand-off zone surrounding any solution feature, unless appropriate mitigation measures are undertaken and approve

**Portsmouth Water** – No objection subject to conditions requiring following being attached to any approval:

• Submission to the LPA for approval of details of a Construction Environmental Management Plan (CEMP) prior to development commencing

• Submission to the LPA for approval of details of surface water drainage systems prior to development commencing

• Submission to the LPA of details of any contamination not previously identified found to be present within the site and methods of remediation

• There will be no building or structure, including drainage infrastructure and utility trenches located within a 10m stand-off zone surrounding any solution feature.

• That there will be no piling or any other foundation construction without written consent of the LPA

• Submission to the LPA of any proposed below ground engineering works

• Submission to the LPA for approval of details of scheme to dispose of foul water

• There will be no underground storage tank used for the storage of hazardous substances

• Submission of details of how roads and parking areas are to be carefully constructed to ensure that all drainage discharges through appropriately sized interceptors

• Submission to the LPA of details within the relevant reserved matters applications of a scheme relating to all areas of employment land that could be used to store potentially polluting material, or vehicles.

• Submission to the LPA for approval of details of measures which will be undertaken to protect public sewers
• Submission to the LPA of details of offsite foul water drainage

South Eastern Hampshire CCG – No objection subject to a S106 legal agreement to secure a financial contribution of £128,000 from the developer to be used to increase existing GP capacity within the catchment of the development.

Natural England – No objection. Comments have been made in respect of Bechstein bats, impacts on Soakfield Row and nitrogen neutrality with reference made to the need for suitable mitigation and compensation to be secured, as appropriate. No objection is raised to the proposal subject to a maximum water usage level of 110L per day per dwelling being secured, that suitable mitigation and compensation is secured in respect of impacts on Soakfield Row, that mitigation in respect of Bechstein Bats is also secured, and that all open spaces remain so in perpetuity.

Forestry Commission – Comments. If it is intended for substantial quantity of bat boxes to be installed within the Holt and Havant Thicket, such an undertaking would be subject to landowner agreement and undertaken as a strategic conservation initiative in co-ordination with other stakeholders including the Forestry Commission and Portsmouth Water and this requirement should be reflected in any S106 agreement.

Sport England – Holding objection subject to a finalised S106 legal agreement.

The site is not considered to form part of, or constitute a playing field as defined The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595), therefore Sport England has considered this a non-statutory consultation.

Football pitch

The proposed football pitch will be of a ‘3rd Generation’ (‘3G’) rubber crumb surface and complying with Sport England standards, and able to accommodate an adult sized football pitch with two junior sized pitches within it, however there is no detail at this stage regarding the design; specification and layout of the proposed pitch and ancillary facilities; as well as their ongoing management and maintenance. For example, in order for the facility to be fully available to the community for formal sport it will need to comply with relevant national governing body (FA) and Sport England technical design guidance. For competitive football use, the pitch would need to be registered on the FA’s register of Artificial Grass Pitches and subsequently tested. Similarly, the AGP will require ongoing maintenance and it is important that business plans are put in place to ensure that the pitch is maintained to a good quality and the artificial surface is replaced after a period of approximately 8-10 years.

Without having these details at this stage, it is difficult for Sport England to formally withdraw their objection however Sport England are supportive of the overall approach subject to agreeing the detailed wording in any Section 106 agreement relating to the provision of any sports facilities, and which Sport England would request to be consulted on.
Community Building

Sport England does not object to dual use ancillary facilities which serve both sports users as well as wider community needs. In fact the approach can have benefits in terms of viability and sustainability. However, it will be important that such a facility supports the sporting use of the facilities/site. We would expect compliance with our and relevant national governing body for sport technical design guidance for clubhouses and pavilions. Such that key components of ancillary provision, as well as changing provision, are considered eg storage; catering; toilets etc.

Cricket pitch

Sport England acknowledges the approach to cricket in the area.

*Officer note: Bloor Homes has submitted a separate planning application for land north of Rowlands Castle Road (current application ref. 55562/006/Out), which includes provision of formal open space for community use, on which a cricket pitch and pavilion can be provided. It has been agreed with Officers that a proportionate financial contribution would be made towards the provision of a cricket pitch (which could be on land to the north). This would be secured through the Section 106 accompanying the planning permission.

Active design

Sport England, in conjunction with Public Health England, has produced ‘Active Design’ (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government’s desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link:

http://www.sportengland.org/activedesign

Conclusion

In order for Sport England to consider it capable of meeting their planning objective 3 – to provide new facilities to meet demand, a suitable Section 106 agreement would need to be drawn up detailing the sports provision to be delivered. Sport England therefore wishes to maintain its objection until they are satisfied with the wording of a draft section 106 or similar legal agreement detailing the sports provision to be delivered within a reasonable timescale.

Health & Safety Executive – No objection subject to the detailed scheme not breaching relevant no-build distances from the high-pressure gas main crossing the site.
South Downs National Park Authority – Objection.

8th January 2019

The SDNPA currently raise concerns over the proposed development as it is not clear whether suitable mitigation landscaping/screening will be delivered in order to minimise the impact of the development on the setting of the South Downs National Park and on the setting of the Grade II Listed Buildings at Pyle Farm.

23rd August 2019

The comments raised in the SDNPA’s consultation response dated 8th January 2019 remain unchanged. The further information submitted does not appear to address the landscape impacts of the proposal and the SDNPA's concerns raised in terms of the impact of the development on the setting of the National Park, especially the intended treatment of the development along Havant Road and Pyle Lane.

Policy HN1 (h) requires that the development "provide landscaping and screening to minimise the impact of development on the setting of the South Downs National Park and on the setting of the Grade II Listed Buildings at Pyle Farm". As outlined in our previous comments, the application as currently submitted does not clearly demonstrate/confirm that this criteria will be met.

2nd April 2020

We maintain the objection as set out in our previous responses of 8th January 2019 and 23rd August 2019, with the following additional comments.

Whilst we note the applicant’s explanation of why they feel a southern access might be required, the extent of works to create such an access remains a key point of objection for the SDNPA.

The widening of the B2149 to create ghost island junction, along with loss of further hedgerow, road markings, and opening up of views into the development will unnecessarily bring the urban character further south east. Having had sight of Plan VD18678/100-06, We would also like confirmation that the red-line boundary and any widening of the B2149 do not extend into the SDNP, which is understood to run to the edge of the metalled carriageway rather than the field boundary.

We continue to support the principle of a shared footpath/cycleway towards Havant Thicket (insofar as is within the applicant's control), but we would maintain that this could be achieved west side of the roadside hedge to avoid further unnecessary loss of hedgerow.
The creation of a link from FP54 across Pyle Lane to FP25 (which is within the National Park) is welcomed. Both these footpaths form part of the long-distance Monarch’s Way. Although the details would be the subject of a reserved matters application, we would suggest that the crossing point on Pyle Lane could utilise an existing gap in the hedgerow (field access) opposite the entrance to FP25.

*Officer note: the red line site boundary has been amended such that none of the proposed highways works will fall within the SDNP.

Chichester District Council – No objection

Havant Borough Council – No objection.

EHDC Forward Planning – No objection. Subject to the case officer and external statutory consultees being satisfied that the proposed development satisfies all the criteria detailed within Policy HN1, it is considered that the principle of the proposed development accords with the relevant local and national planning policies. The application should also not prejudice the separate delivery of the care village element of the policy, which was part of the original outline application. Therefore, there is no policy objection subject to the application being acceptable in all other respects.

EHDC Economic Development – No objection subject to the following being secured by S106 legal agreement as part of any approval:

- An agreement to assist in the placement of apprentices and unemployed from the local area into jobs during the construction phase of the development including; direct labour agreements, training, work experience/ placements and apprenticeships to be implemented during the construction phase of the project and also following completion date (if required).

- New access to the employment area to be delivered as part of the proposed works to the Havant Road/ Dell Piece East roundabout. This new access forms the fifth arm of the Havant Road/ Dell Piece East roundabout (see drawing reference: VD18678/100-05 General Arrangement) and the proposed works to this roundabout (including the fifth arm for the employment area) remains the same as previously approved (see Planning reference 55562/001 and the S106 Agreement dated 4th February 2016 – Schedule 3: Highways Part 2 and drawings A081737_023 and A081737_52).

- Delivering the fifth arm of the Havant Road/ Dell Piece East roundabout to service the employment area is not unlike providing the third arm for Land parcel A, both of which are additions to the existing roundabout (see drawing reference: VD18678/100-05 General Arrangement). Also, carrying out the works to the whole roundabout at the same time will minimise impact on road users and the area as a whole. The applicant does not seem to have considered the likely significant impact on road users and disruption to the area resulting from having to deliver the fifth arm at a later date.
B1 and B2 employment floorspace (employment area) to be delivered in Phase 2 and tied into the delivery of the dwellings by way of occupational triggers through a S1O6 Agreement. We do recognise that this is a departure from what was previously agreed on the site i.e. delivery of the employment area in the Phase 1 of the mixed use development (planning reference 55562/001). The change from Phase 1 delivery to Phase 2 delivery, whilst not preferable and despite the absence of viability assessments, represents a reasonable compromise which allows for the planning process to progress.

In certain circumstances where the developer is unable to deliver local job opportunities through the Local Employment and Training Agreement, the developer can negotiate a financial contribution to enable the Council to generate alternative employment opportunities. The funds would be retained specifically for employment, skills, training and enterprise support through the Get East Hants Working Initiative.

**EHDC Communities Team** – No objection subject to the following being secured as part of the development:

- An artificial ‘3G’ football Pitch and ancillary changing facilities. The Playing Pitch Strategy clearly states that there is a shortage of football pitches in the Southern Parishes. The provision of youth, junior and mini football are all priorities in the South of the District.

- That any Community Building is a multi-functional building with adaptable, flexible space that would attract high yielding activities to ensure financial sustainability of the building into the future

- That any allotment have a communal building for storage, fenced off plots, adequate access and parking

- Formal and informal open space (including play equipment) provided as part of the development site, as this would provide amenity and recreational benefits and opportunities to improve health & wellbeing.

- Provision of a travel plan for the school, employment and retail

- Cycle route provision and safer routes to schools, including Horndean Technology College
EHDC Conservation – Objection/comments.

On the basis of the information submitted, the application in its current form would impact negatively on the strong visual and spatial relationship between Pyle Farm/Hook Cottage and the surrounding landscape. Introducing a development, particularly one of this scale in such landscape and in such proximity to Grade II listed buildings is fundamentally at odds with its rural environment. For these reasons, the proposal in its current form will be harmful to the significance of these designated and locally prominent Grade II listed buildings through the impact on their setting.

In accordance with the NPPF - it is believed the degree of harm to this listed building would be significant, but on balance, less than substantial. In this context, the NPPF requires such harm to be weighed against the public benefits of the proposal.

EHDC Arboricultural Officer – No objection subject to a condition being attached to any approval requiring details of a finalised Arboricultural Impact Assessment and scaled Tree Removal/Retention Plan linked to a proposed layout and a detailed Arboricultural Method Statement being submitted to, and approved in writing, by the LPA prior to development commencing.

EHDC Landscape Officer – No objection subject to detailed landscape information for the residential, commercial and community areas, open spaces and proposed acoustic bunds being submitted at reserved matters stage. Advance structure planting should be carried out wherever possible to address the loss of existing hedgerows and trees (e.g. along Havant Road) and to soften the edges of the site adjacent to the SDNP boundary to the east of the site.

EHDC Housing Officer - no objection to this new outline application, which proposes an additional 100 dwellings as the affordable housing numbers have been adjusted accordingly.

Whilst this is a fresh application, a detailed affordable housing scheme broadly in line with the provisions of the elapsed s106 agreement, which includes a 5% provision for fully accessible wheelchair (affordable) housing should still be provided.

EHDC Environmental Health (Contamination) – No objection subject to conditions being attached to any approval requiring details of any remedial works carried out and validation of the remedial works, and a condition be attached to any approval requiring that development stop if any unsuspected contamination is found on site until details of this and remediation are submitted to the LPA.
EHDC Environmental Health (Pollution) – No objection subject to a condition being attached to any approval requiring a detailed assessment of site suitability to be submitted to the LPA at the detailed design stage, to determine the exact acoustic specifications of any mitigation measures required for the proposed development, a detailed construction noise assessment to be submitted to the LPA for approval once a detailed construction method statement and construction programme are available, and an assessment following the guidance contained in BS 4142:2014 ‘methods for rating and assessing industrial and commercial sound’ to be submitted to the LPA for approval at the detailed design stage, to determine and minimise noise Impacts to sensitive receptors nearby from these noise sources.

EHDC Drainage Consultant - No objections in principle subject to details of satisfactory drainage systems for both foul and surface water being submitted to, and approved in writing, by the LPA prior to development commencing, together with agreement from EA and Portsmouth Water of these details.

EHDC Traffic Management Team – No objection.

EHDC Refuse and Recycling – No objection however the developer is made aware that the detailed scheme will need to comply with the relevant standards in terms of refuse vehicle access and collection.

HCC Highways Authority - No objection application subject to the securing the mitigation package and conditions as outlined:

Section 278 works

- Junction 2 A3(M) signalised crossings and cycle scheme which connects to existing provision at the Lakesmere Road/B2149 junction, as shown indicatively on drawing VD18678/100-02 Rev D
- Improvements to the Havant Road/Dell Piece Roundabout as shown indicatively on drawing VD18678/100-03 Rev E and associated footway/cycleway works
- Three new access onto B2149 as shown indicatively on drawing VD18678/100-04 Rev E, VD18678/100-05 Rev E, VD18678/100-06 Rev E and associated footway/cycleway works
- New access onto Pyle Lane as shown indicatively on drawing VD18678/100-05 Rev E
- New bus only access onto Rowlands Castle Road, as shown indicatively on drawing VD18678/100-07 Rev B and associated footway works

Section 106 obligations

- £482,000 towards Rowlands Castle Double Mini roundabout improvement scheme
- £201,000 towards multi-modal access to Rowlands Castle Rail Station
- £6,000 Traffic Regulation Order contribution
- Provision of up to three controlled crossing points
- Provision of bus infrastructure
- Full Travel Plan, including approval fees, monitoring fees and Travel Plan Bond

Conditions should also be attached to any approval requiring details of a Construction Traffic Management Plan and Bus Service Agreement to be submitted to, and approved in writing, by the LPA prior to development commencing.

**HCC Ecologist** – No objection subject to conditions being attached to any approval requiring details of ecological mitigation, compensation and enhancement measures and a Construction Environmental Management Plan to be submitted to, and approved in writing, by the Local Planning Authority (LPA) prior to development commencing.

**HCC - School Organisation** – No objection subject to the applicant entering into a section 106 agreement to secure a contribution of £5,229,096 towards the cost of the new primary school in order to mitigate the impact of the development on educational infrastructure and ensure that sufficient school places are provided to accommodate the additional children expected to be generated by the development.

**HCC Lead Local Flood Authority (HCC LLFA)** – No objection subject to conditions being attached to any approval in requiring the following:

- Submission to the LPA for approval of details of detailed surface water drainage scheme
- Submission to the LPA for approval of details of details for the long term maintenance arrangements for the surface water drainage system

**HCC Archaeologist** – No objections subject to conditions being attached to any approval requiring details of a programme of archaeological work in accordance with a written brief, specification and timetable for a scheme of investigation and a programme of archaeological assessment in accordance with a written scheme of investigation to be submitted to, and approved in writing, by the LPA prior to development commencing.

**HCC - Rights of Way Officer** – Objection. In the absence of any adequate assessment of impact on Rights of Way and users, including equestrians, and without proposals for any improvements for countryside access or enhancement to Rights of Way to mitigate adverse impacts, an objection must be maintained. As impact on the natural environment and Right of Way have not been assessed as part of the Environmental Statement or information to support the planning application, it is suggested that access details should currently be approved by the LPA.

**HCC Minerals and Waste Planning** – No objection.
**South East Water** – No objection.

**Southern Water** – No objection subject to a condition being attached to any approval requiring details of a scheme for foul and surface water drainage be submitted to, and approved in writing, by the LPA prior to development commencing.

**Southern Gas Network** – No objection subject to the detailed development not impacting on the high pressure gas main crossing the site.

**Crime Prevention Design Advisor** – No objection however advises that the detailed development should be designed in accordance with the advice provided on crime prevention.

**Hampshire Fire and Rescue Service** - No objection however advises that the detailed development should be designed in accordance with the advice provided.

**Horndean Parish Council** – Objection.

The increase in housing density, height of proposed buildings and the urbanisation of the section of Havant Road which overlooks the SDNPA is contrary to CP29 Design. This is also contrary to the Horndean Village Design Statement.

Further, the layout of the retail (serviced from the front), education and community facilities is contrary to CP29 Design.

The following comments raise concerns which should be addressed before the Application is determined. Consultation with both Parishes and residents would be welcomed.

**Design and Access Statement:**

Pg 2. The community facilities are classed only as D2. This is restrictive and D1 classification should be added. The HPC Design Brief V7.5 applies

Pg 10. There is no mention of the Horndean Conservation Area in the commentary on Horndean.

Pg 16. The Traffic Assessment is considered to be inadequate. It is important to note that many people will travel to Havant via the B2149 rather than the A3(M), therefore the TA and road improvements must take account of this to avoid major disruption in the area.

Pg 20. As raised under "Access" the hedgerow along the western side of the B2149 is missing from the Constraints plan, as is the hedgerow along the southern edge of the road - Dell Piece West. It is not desirable to urbanise this area any more than is essential.

Pg 24 and Pg 25 It is important to note that none of the Design Development included input from HPC or residents which is contrary to best practice for public engagement.
Pg 28. A two-form entry primary school is listed. That is what is required with the increase in housing numbers. Please confirm that this will be provided.

The hedging along the Havant Road should be retained to maintain the character of the area. No houses should front on to Havant Road.

The Community building, retail provision and school are situated near the main entrance to the site so that each facility faces a busy road and they are separated by that road which will carry a lot of traffic. This is likely to reduce the co-operative use of car parking and introduces the need for safe crossing points to be constructed.

The next section is entitled "Character"

Pg 33. It is difficult to identify the area described as "south-facing public space.......... Why is the Retail provision to be serviced from the front? Service access should be from the rear or it will interfere with the enjoyment and safety of that frontage.

The small drop-off zone for the school appears to be entirely inadequate and will lead to street parking and congestion. The trip estimate in the Transport Assessment associated with the schools is, in our experience, far too low and unrealistic.

The public realm vision is unrealistic - it will be dominated by vehicles - parents taking children to and from school, delivery lorries, visitors to the community centre and "passing trade" which by its very nature will be via a vehicle.

Pg 34. The Linear Park (following the line of the gas pipe) on Plot C is crossed by two roads - what provision is made for users of the Park to cross these in order to ensure it is "a vibrant area for pedestrian movement" and not a series of disconnected spaces? The B2149 separates the two parts of the Linear Park i.e. area C from area B but a crossing is to be provided in a suitable location.

A NEAP is mentioned. The play and leisure facilities detailed in the extant S106 are not mentioned.

Pg 35/36/37 The three neighbourhoods raise concerns:

a) Horndean Park and Havant Road - the urbanisation of Havant Road is not welcome, nor is it appropriate opposite the SDNPA. The rural street-scene should be preserved. Horndean is considered to be a semi-rural settlement and loss of this should be avoided. It is difficult to see how "building fronting onto it will make it more attractive"

b) Rowlands Castle - why has this name been applied to area B? The village two miles along the B2149 might find it confusing - as will the residents of Horndean! It is suggested that this neighbourhood will benefit from "Soft landscaping and integrated street planting". Perhaps this could be applied to the other two neighbourhoods rather than an urban landscape.
Pg 38. The allotments have been moved and there does not appear to be any road access to them or any car parking for allotment holders. Further, the area allocated is only .36ha - previously 0.75ha. The extant permission is for 60 1/2size allotments which cannot be provided in 0.36ha.

Further there is no mention of the Allotment buildings which were to be provided. Is this due to them being situated in a no-build zone?

The football pitch appears to be squeezed into the land allocated with little provision for spectators. There must be sufficient area for spectators. There must be provision for use of the school pitch by the Community outside School hours.

Trees covered by TPO's and which are significant and important to the character of area should be retained. No building should take place within the tree canopy or root area. The tree assessment covers all of these aspects and should be utilised and enforced.

Pg 40/41 The GI is welcomed

Pg 45. Phasing - the Commercial element is now in Phase 3 raising concerns that occupiers will not be employed in the commercial area but work outside of Horndean. The Commercial element should be provided much earlier in the development.

The Framework Travel Plan is over optimistic in terms of travel times and out of date in terms of the facilities quoted and missed out.

Comment Date: Tue 13 Aug 2019

OBJECTION and the following points are made:-

1. HPC has not changed its original objection to the application and the Applicant should respond to the points that have been raised.

2. That HPC request an urgent meeting with the Applicant to discuss concerns.

3. That HPC and EHDC query with Hampshire County Council the change in requirements put forward by Children’s Services particularly in view of the fact that one of the suggested uses for part of the new Community Building is that of Early Years Provision.

4. The Applicant is aware that one of the cornerstones of the development of this site is that the character of the Havant Rd should not be changed. The urbanisation of the Havant Rd as set out in paragraph 2.8.9 of Appendix A. Of the Technical Note Response to HCC comments part 1 produced by Vectos for the Applicant is unacceptable.

Comment Date: Tue 17 Mar 2020
OBJECTION. Notwithstanding what is set out in the Technical Design Response by Terence O'Rourke dated February 2020 and uploaded to the website on 3rd March 2020. Our previous comments and objections still apply.

Rowlands Castle Parish Council – Objection. Full comments are contained within Appendix 1.

Comment Date: Thu 24 Jan 2019

RCPC has focused its research and subsequent objections on the (unreserved) matters of the means of access to the highway network (junction arrangements) and associated highway improvements aspects of this Application.

A. RCPC found the TA to be inaccurate and inadequate. It does not consider the cumulative impact of this site along with other dwellings under construction, committed developments and allocated sites using the highway network in the area

B. Inaccurate Information about traffic generated by LEOH Development

C. No recognition of impact of travelling to local facilities in Rowlands Castle

D. Road layout

E. Other issues

RCPC would normally expect an Application of this scale and nature to include substantial transport-related documentation in the form of a named Transport Assessment or Statement to justify the proposals therein. In RCPC's opinion, neither The Environmental Statement - Traffic and Transport nor Environmental Statement Appendix J Part 1 (TA), constitute an appropriate level of examination and evidence to support this Application.

It is important that the proposed highways improvements should accurately consider and accommodate the total cumulative volume of traffic that will be using Havant Road and other parts of the highway network in 2030 which is when it is anticipated that the development of the site would be complete. This would be to the benefit of both the residents of the proposed development and neighbouring areas such as Rowlands Castle, and of all users of the highway network.

Comment Date: Fri 06 Sep 2019

Rowlands Castle Parish Council (RCPC) considered this Pre-Decision Amendment at its Meeting on 2 September 2019, occasioned by the further technical information received including the Applicant's response to RCPC's original objections raised in January 2019. RCPC unanimously agreed to continue to OBJECT to this Application on the grounds that RCPC does not feel the Applicant's responses to RCPC's original objections adequately address the issues raised by RCPC. RCPC's further comments are detailed in the accompanying 'Further Comments' Report, and related documents attached as follows:
Annex B (from comments on original document); Residential work-related trips to the SE and London regions by residents of RC Ward and Horndean Hazelton & Blendworth Ward on 2011 Census Day; Supplementary Details on Increase in Traffic on Rowlands Castle Road.

Comment Date: Wed 01 Apr 2020

As is sadly the case for most, if not all, planning applications, there is little or no indication of how these plans and reports have or have not changed since the previous versions submitted in either or both of the original application or the pre-decision amendment in September 2019. From what I can determine by visually comparing the above with previous versions, there have been no changes to plans for areas within our parish.

Another document submitted is the 'Land east of Horndean - Further post-application technical and design response to issues raised by consultees - Bloor Homes February 2020' prepared by Terence O'Rourke.

The following 'Further Comments' submitted by RCPC in September 2019 have not yet been fully addressed in the plans and documents submitted for this amendment:

RCPC 2. No assessment of growth in traffic from further 80 dwellings now developed in Rowlands Castle, none of which were occupied when the traffic survey was undertaken. There is also another site allocated for 10 dwellings.

'Paragraph 6 of the 'B2149 Rowlands Castle, Double Mini-Roundabout Junction Capacity Assessment', the only the committed developments considered are those that were specified in the Transport Assessment dated December 2018 (Appendix G and H), and that did not include these 80.

RCPC 3. No assessment of the impact of traffic from dwellings under construction and allocated sites in nearby areas of Havant Borough which will use Havant Road to connect with the A3(M)

RCPC 8. No assessment of the impact of increased traffic on the junction of Havant Road and Castle Road.

The Traffic Flow Diagram (Development PM) Appendix A of the 'B2149 Rowlands Castle, Double Mini-Roundabout Junction Capacity Assessment', shows that 9 vehicles per 15 minutes would travel south from the development and turn eastwards into Redhill Road, and the 'Development AM' diagrams shows 15 vehicles per 15 minutes would take this route.

Because there is mainly only residential accommodation along the stretch of Redhill Road from the mini-roundabouts to its junction with Castle Road, it seems very probable that these vehicles would be travelling through the Rowlands Castle village to other destinations such as Chichester. In this case, it is more likely that they would use Castle Road which is a shorter route.
RCPC 9. No assessment of the impact of increased traffic on the junction of Manor Lodge Road (a continuation of Havant Road) and Mallard Road that already experiences delays and queuing at peak times. It is the only exit for the 160 dwellings in the Kings Meadow Estate.

RCPC 11. No recognition that the entire application site is within the catchment area of the Rowlands Castle GP Surgery that will probably require residents of the application site to drive into the centre of the Rowlands Castle village, which has very limited parking facilities.

RCPC 15. Non-compliance with EHDC Local Plan (2014) policy CP31 because no proposals are made to improve access to and parking at, or adjacent to, Rowlands Castle railway station.

There is no assessment of the cumulative impact of traffic arising from this proposed development and the other proposed Land East of Horndean developments, viz. EHDC Planning applications 55562/006, 55562/007 and 5562/008.

The 'Parameters Plan & Trees and Buildings' does not show that the large woodland area in the southernmost part of the site to the west of Havant Road, as depicted in the 'Illustrative Master Plan', would be retained. Instead that area is designated as 'Development Footprint'. It should be clarified whether or not that woodland area is to be retained.

**Representations**

53 letters of representation have been received of which 4 are supportive of the proposals, 44 broadly object and 5 are considered to be neutral in their response. The comments are as follows:

- Would rather see this one development and all that it provides than the myriad of smaller sites that have been developed over the last couple of years urbanising our smaller villages and providing no infrastructure improvements

- There is no easy solution to this demand for housing placed by Government, but EHDC have their local plan. So many councils have not had their local plan in place and this has rendered them helpless in preventing development on sites deemed 'sustainable'

- EHDC, along with all other LAs, have been set a difficult task to find suitable and sufficient development space in their districts and boroughs. This is particularly so for EHDC, for the Parishes south of Butser, as a significant part of this area is taken up by the SDNP

- EHDC have done a sterling job in identifying LEOH and generating the necessary interest for development

- Being located so close to the main arterial route of the A3(M) means that traffic effects and management, whilst a recognisable challenge, will be mitigated
• this is a good solution for the requirement, where a structured and integrated outcome can be achieved as opposed to trying to spread this quantum of housing through sporadic pockets of development, the affected areas benefiting from little or no evident infrastructure improvements

• This proposal does not conflict with the EHDC JCS at all, but supports its strategic aims and therefore support this proposal

• This plan protects garden grabs and inappropriate use of open space

• The Planning team should take on board all the comments made in the earlier iterations of this development and not just stick to the comments in this application reference (005). Many people have taken the time to comment on the previous designs and those comments are still, for the most part, applicable to this planning application.

• As a local business owner, the development is welcomed

• Local businesses should be given first refusal on any commercial premises provided

• If there must be all this additional housing then LEOH is the least worse place for it

• There is no vehicle access from the public highway close to the allotments, cars will have to enter on the Havant Road and pass through all the housing on the Pyle Farm site

• No allotment parking is shown on the plans

• Houses on Idsworth Close adjacent to the field will suffer loss of privacy and noise pollution especially at weekends

• No rationale for the removal of trees within the proposed development

• No considerations for aesthetics for the development or integration of trees, grass or open areas or hedging within the residential areas

• No consideration for sympathetic landscaping around the perimeters of the proposed development, whether viewed externally in, or vice versa, given the proposed development borders the South Downs National Park,

• Not clear why this application has increased from 700 to 800 houses and what justifies this proposed increase

• The development will add directly to congestion on Rowlands Castle Road
• Impacts of other development in the vicinity on the local infrastructure (traffic and cyclists) and other factors such as noise, air quality, landscape (excessive overdevelopment), loss of habitat, light pollution, nitrates, flood risks etc.

• The existing roundabout and junction 2 of the A3(M) will not support the significant increase in traffic

• Opportunities should be taken to improve cycleways and access to/from the site to the wider area

• Rowlands Castle Road is a small village road that would cause significant disruption to the existing properties

• There is no pavement, cycle or bus lanes on the B2149 and therefore everyone moving into the development will be forced to drive their children to the local secondary schools and activities and drive to work, increasing pollution further.

• Addition of traffic lights to the main roundabout over the highway will add to traffic congestion

• Impacts from constructors’ traffic and heavy equipment considering this will be ongoing probably for at least 5 years

• What process and monitoring has been put in place to ensure minimum disruption to residents and the use of smaller roads leading to or around the site

• Impact of projected Havant Thicket reservoir

• Flood risk issues

• Impact on ecology within the site

• No recognition of Climate Change Emergency

**Determining Issues**

1. Development plan and material considerations
2. Principle of development
3. Deliverability
4. Balance and mix of housing types
5. Design and layout of the proposed development and its impact upon visual amenity and landscape character
6. Access, movement and highway safety
7. Impact on the amenity of neighbouring occupiers
8. Drainage and flood risk
9. Impact upon bio-diversity
Planning Considerations

1. Development plan and material considerations

As required by section 38(6) of the Planning and Compulsory Purchase Act (2004), applications must be determined in accordance with the development plan, unless material considerations indicate otherwise. The development plan for East Hampshire District comprises the 'saved' policies of the East Hampshire District Local Plan: Second Review (2006), the policies set out in the adopted East Hampshire District Local Plan: Joint Core Strategy (JCS) (2014), and the EHDC Housing and Employment Allocations (2016).

The application site is located outside the Settlement Policy Boundaries (SPB) of Horndean and Rowlands Castle, with policies in the JCS supporting appropriate residential development within settlement policy boundaries and only supporting 'exception' schemes outside of SPBs. This site is, however, an allocated site therefore the proposed development does not constitute a departure from the local plan.

Government advice contained within the National Planning Policy Framework (NPPF) advocates a 'genuinely plan-led' system as one of the core planning principles for the planning system. Paragraph 10 of the NPPF advises that at the heart of the Framework is a presumption in favour of sustainable development, and which means:

‘c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.’

Five Year Housing Land Supply
Paragraph 73 of the NPPF states that Local Planning Authorities (LPA ‘should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies’.

The Council’s latest housing land supply figures show that as of 1st April 2019, East Hampshire District Council (outside of the SDNP) has 5.87 year supply and a surplus of 469 dwellings once an additional 5% buffer has been taken into account to ensure choice and competition in the market for land.

**Housing land supply considerations**

There is, as detailed above, a 5 year housing supply within the district. The requirement for maintaining a 5 year supply (plus 5% buffer) is a rolling target which is imposed on Councils through Government policy. The spatial strategy set out by the JCS, is to distribute new housing throughout the key settlements within the district outside of the SDNP. The amount of housing is based on the identified settlement hierarchy as follows:

- **Alton** – a minimum of 700 new homes
- **Horndean** – a minimum of 700 new homes
- **Clanfield** – a minimum of 200 new homes
- **Liphook** – a minimum of 175 new homes
- **Four Marks/South Medstead** – a minimum of 175 new homes
- **Rowlands Castle** – a minimum of 150 new homes
- **Other villages outside the South Downs National Park** – a minimum of 150 new homes

This strategy focuses the majority of new housing development to the towns of Alton, Horndean and Clanfield, which are classified as market town, large local service centre and small local service centre respectively.

If granted planning permission, this proposal of up to 800 dwellings would help to satisfy the total housing requirement of the settlement. This fact should be given significant weight in the decision making process especially given the need to maintain the 5 year housing land supply. Given the need to maintain the 5 year land supply, this development will make an important contribution to housing delivery.

It should be noted that there is a recently elapsed outline approval for the similar development proposing up to 700 dwellings.

There are significant benefits in securing affordable housing provision to meet identified local needs. In this respect the Housing Officer is supportive in principle and points to present levels of need. This scheme proposes 40% affordable housing, which is policy compliant, and this fact should be given significant weight.
As with the previous scheme, there is a direct allocation of employment land within the Development in accordance with Policy CP3 of the Core Strategy and there are also employment opportunities throughout the local centre. The scheme would provide a number of employment opportunities from construction through to the operation and the development is again supported by the EHDC Economic Development Officer. An Employment and Training Plan would be secured through a S106 legal agreement which would seek to ensure that training opportunities are also provided during construction. This is in accordance with Policy CP5 of the Core Strategy.

As with the previous outline approval, it is also considered important to maintain flexibility in terms of the final commercial land uses to ensure the development can respond to changing market conditions. The marketing strategy, to be secured by S106 agreement, and which will be undertaken prior to Reserved Matters stage will inform the type of employment uses to be delivered on the application site. It is considered sensible to define employment land uses as close to the point of delivery as possible when they can respond to market demand quickly. This is accepted as being a sensible and suitably flexible approach.

Delivery of the employment land needs to be suitably early within the development and is anticipated to be no later than within Phase 2 of development. This can also be secured by S106 legal agreement.

Overall the scheme would make an important contribution to housing supply requirements, including the 5 year housing land supply position, continuing to boost significantly the provision of housing within the district and also within Horndean, where there is still a significant residual requirement for housing. The scheme would provide a policy compliant level of affordable housing and provide employment and training opportunities through the construction period, and employment opportunities once in operation. These are significant benefits of the scheme.

2. Principle of development

Locational suitability

The site is allocated in the EHDC Housing and Employment Allocations (2016) and is subject of a recently elapsed outline consent for the same development as allocated. This current application also proposed the same development with the exception of an increase in dwellings from up to 700 to up to 800.

The western boundary of the application site is located directly adjacent to the settlement policy boundary (SPB) for Horndean as well as part of the A3(M). It should be noted that the western parts of the application site are generally proposed as open space. This will allow for joint use between residents of the existing and new settlements and is considered to be desirable.
The previous approval had a very low density of dwellings as at that time, the ground conditions on the site had not been fully explored and it was anticipated that some land could not be developed due to the presence of solution features (sink holes) within the developable areas. The site has since been subject to a full ground condition survey and no solution features were found within the developable area. This certainty has, therefore, allowed the number of dwellings to increase within the same area of land, making more efficient use of the developable area.

In terms of the location of the site relative to services and facilities offered by Horndean, the nearest and furthest parts of the site are situated between 1.34km – 2.15km from the town centre by either foot or cycle.

Bus stops are currently 18 – 26 minutes’ walk away at The Precinct and 14-31 minutes’ walk away at Hazelton Way. There are regular buses services to Portsmouth and Alton. There is the ability for future bus provision through the site, if it is considered necessary, by provision of bus stops within the site and a bus gate into Rowlands Castle Road. This would facilitate the diversion of the existing Service 8 through the site. The County Council are satisfied with this position.

Rowlands Castle rail station is 3km to the east and provides an hourly service to Portsmouth and London Waterloo.

It is noted that the application proposes footpaths through the development, which would link into the existing network and are considered to improve accessibility to the surrounding countryside.

The nearest cycle route is National Cycle Number 222 which runs along the A3 and through the village centre. There are several public rights of way in the locality. They include Broad Walk, a public footpath running from Rowlands Castle, through the National Park and woodland known as ‘The Holt’ across Soakfield Row and into the built-up part of Horndean. There is a bridleway along the western edge of the site, parallel with the A3(M). This crosses over the motorway via the bridge in the southwest corner of the site, before running down Sheepwash Lane and northwards through Hazleton Common Nature Reserve.

Highway improvements to be delivered as part of the scheme include a pedestrian/cycle link along Havant Road and Dell Piece West linked with the existing pedestrian infrastructure of Horndean. In addition to the above, it is proposed that a new reduced speed limit would be applied for and implemented along Havant Road and Dell Piece East to encourage pedestrian and cycle activity and reduce traffic noise.

The Morrisons supermarket is considered to be close by, as is Keydell Nurseries. Horndean Heath Centre is between 1.35 – 2.14km, depending on which part of the application site it is measured from.
Land for a primary school, to be delivered by Hampshire County Council, will be provided on site. Access to Horndean Technology College by foot/cycle is available along Havant Road and Portsmouth Road and will be available via junction 2 of the A3(M) following improvements to cycle and pedestrian access at this junction. The applicant has committed to the provision of school bus service until such time as these works have been completed.

In accessibility terms, the site is in a sustainable location, which weighs in support of the scheme.

3. Deliverability

The NPPF (Annex A) states the following:

‘To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.’

There are not believed to be any grounds for concluding that the development could not be implemented within a short time period if permission were granted.

The site is allocated within the adopted EHDC Housing and Employment Allocations (2016) for the development now proposed. Aside from a small increase from the allocated about 700 dwellings to the now proposed 800 dwellings, the application is similar to that previously consented. This application does not prejudice other parts of the allocated site, north of Rowlands Castle Road, coming forward.

The application is supported by a suite of technical documents which confirm that there are no technical reasons to suggest that the development is not deliverable.
The application has been supported by a Utilities Assessment which gives consideration to the supply of water, electricity, gas and telecommunications to the site, in consultation with the utility providers. This concludes that the development could be supplied with normal network service supplies without prohibitive reinforcements to networks. As such there would not appear to be significant off-site infrastructure works arising from the development which might delay its implementation of the development. Therefore, there are no evident barriers to the development coming forward.

4. Balance and mix of housing types

The submitted Planning Statement advises that the development would comprise up to 800 dwellings, of which the applicant has confirmed that 40% would be affordable housing. The mix of affordable housing will be secured through the S106 agreement. The current indicative mix of housing is as follows:

**Affordable housing (217 Units/70%)**

<table>
<thead>
<tr>
<th>Number</th>
<th>Property Type</th>
<th>Min. Unit Size</th>
</tr>
</thead>
<tbody>
<tr>
<td>78</td>
<td>1b2p flats</td>
<td>50sqm</td>
</tr>
<tr>
<td>18</td>
<td>2b4p flats</td>
<td>70sqm</td>
</tr>
<tr>
<td>04</td>
<td>2b3p bungalows</td>
<td>70sqm</td>
</tr>
<tr>
<td>84</td>
<td>2b4p houses</td>
<td>79sqm</td>
</tr>
<tr>
<td>28</td>
<td>3b5p houses</td>
<td>93sqm</td>
</tr>
<tr>
<td>05</td>
<td>4b6p houses</td>
<td>106sqm</td>
</tr>
</tbody>
</table>

**Intermediate Housing (93 units/30%)**

<table>
<thead>
<tr>
<th>Number</th>
<th>Property Type</th>
<th>Min. Unit Size</th>
</tr>
</thead>
<tbody>
<tr>
<td>06</td>
<td>1b2p flats</td>
<td>50sqm</td>
</tr>
<tr>
<td>12</td>
<td>2b3p flats</td>
<td>61sqm</td>
</tr>
<tr>
<td>35</td>
<td>2b3p houses</td>
<td>70sqm</td>
</tr>
<tr>
<td>40</td>
<td>3b4p houses</td>
<td>85sqm</td>
</tr>
</tbody>
</table>

The Council’s Housing Officer’s has confirmed that the proposed 40% affordable housing is acceptable and has demonstrated the need for affordable housing to be delivered on site as part of this development. This will help achieve the requirement in the NPPF to provided mixed and inclusive communities.

The affordable housing provision would need to be secured through a legal agreement, with triggers for the transfer of the affordable housing land / units to an acceptable Registered Provider. The tenure type would also need to be secured as 70% affordable rent and 30% intermediate tenure, in accordance with the adopted supplementary guidance on affordable housing.
The housing mix of the 60% market dwellings is not yet known, however it is expected that it would reflect general market needs within the immediate area and wider district. As part of the evidence for the emerging Local Plan, EHDC has undertaken a study examining housing and employment needs within East Hampshire (outside of the SDNP), referred to as a Housing and Economic Development Needs Assessment (HEDNA), and the HEDNA (December 2018) suggests an initial appropriate market housing mix for developments as follows (taking into account household changes and ageing population):

<table>
<thead>
<tr>
<th></th>
<th>1 bedroom</th>
<th>2 bedrooms</th>
<th>3 bedroom</th>
<th>4+ bedrooms</th>
</tr>
</thead>
<tbody>
<tr>
<td>5-10%</td>
<td>25-30%</td>
<td>35-40%</td>
<td>25-30%</td>
<td></td>
</tr>
</tbody>
</table>

This will form the starting point for discussions that will inform the detailed design and will be informed by the most up to date housing information available at the time of future reserved matters.

Subject to the appropriate Heads of Terms being secured as part of any S106 legal agreement, the proposal satisfies the aims of policies CP11 and CP13 of the JCS.

5. Design and layout of the proposed development and its impact upon visual amenity and landscape character

The amount of housing proposed falls within the threshold for allocated housing within Horndean as set out in the JCS and is only 100 dwellings more than the EHDC: Housing and Employment Land Allocations. It is considered to be appropriate to the size and role of Horndean as set out within the JCS.

Policy CP29 of the JCS stipulates that new development will be required, to seek exemplary standards of design, ensure that layout and design contribute to local distinctiveness and sense of place, to be sympathetic to its setting, makes a positive contribution to the overall appearance of the area, be accessible to all and minimises the opportunity for crime. The site also shares a boundary with the South Downs National Park and, therefore, must comply with the purposes of the National Park which are to:

(i) to conserve and enhance the natural beauty, wildlife and cultural heritage of the area, and
(ii) to promote opportunities for the understanding and enjoyment of the special qualities of National Parks by the public.
The Park Authority has expressed concerns about the illustrative Masterplan’s consideration of the “conservation and enhancement of the natural beauty of the SDNP”. The Park Authority comments are detailed above and in Appendix 1. Many of the points will be addressed by detailed landscaping and by avoiding the need to create any additional openings and associated hedgerow removal along Pyle Lane. Built form will also be kept away from this boundary as far as possible and building height will be lower. The applicant has confirmed that that existing boundary trees and hedgerows along Pyle Lane will be retained, as shown on the Land Use and Access parameters plan. Furthermore, the illustrative masterplan shows that a strip of strategic landscaping will be provided along the eastern edge of the site, details of which will be provided as part of subsequent reserved matters submission(s). The Design and Access Statement confirms that:

“Additional buffer planting is proposed in certain locations, including alongside the National Park. Additional open space is proposed in order to protect the setting of the listed buildings at Pyle Farm”

The concerns of the Park are noted but they do not constitute an “in principle” objection to the proposal. They are matters of detail, many of which have been addressed or can be addressed through the reserved matters process.

In terms of connectivity, existing footpaths and bridleways will be retained and the site will be highly accessible internally through connected footpath and cycle paths.

Layout, scale and design are matters that will be properly addressed through the submission of reserved matters applications. The Design and Access Statement has detailed a number of character areas which seek to establish parameters for development within those areas. Again, these are broadly illustrative and the final character and design will be established through the reserved matters applications. Given the scale of the development it is appropriate to require a Design Code to be submitted to, and approved in writing, by the LPA prior to submission of the first reserved matters application. This would set the design parameters for different parts of the site as appropriate to their setting.

The proposals have sought to make the most efficient use of land, in accordance with paragraph 122 of the NPPF, whilst being sensitive to onsite and offsite constraints (NPPF paragraph 122, part e). The site will be developed at a net density of approximately 35-40 dwellings per hectare. Densities will be greater close to the local centre, where it is envisaged some flats could be provided. Lower density development will be focused on the eastern edge of the site, to reflect the boundary of the site with the National Park.

The majority of the dwellings would be two storey housing. Variations would occur either on the main frontages of the development away from the National Park or within the site. These would be established through the reserved matters applications. It is considered that this is an appropriate approach in this location.
The local centre and community building are indicated as being located at the centre of the site, with easy access from Havant Road to all parts of the site and to users of Havant Road. The provision of new community facilities is supported by Policy CP16.

Under Policy CP18 of the JCS, all new residential developments are required to provide as a minimum standard the equivalent of 3.45 ha of public open space per 1000 population. Based on an occupation rate 2.4 persons per dwelling, a development of 800 dwellings (1,920 occupants) would require 6.9ha of public open space.

The proposed development would deliver approximately 23ha of open space, including woodland (which will be accessible subject to consideration of ecological constraints), allotments, bat buffer zones and green infrastructure. In addition, provision is made for formal sport, in the form of an adult sports pitch, located close to the local centre. As such the proposed development will significantly exceed the policy requirement in terms of the open space provision which provides significant benefits in terms of the provision of open space.

<table>
<thead>
<tr>
<th>Use</th>
<th>Ha</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Open Space (including Childrens play areas and trim trail)</td>
<td>6.93</td>
</tr>
<tr>
<td>Woodland</td>
<td>7.85</td>
</tr>
<tr>
<td>Allotments</td>
<td>0.38</td>
</tr>
<tr>
<td>Outdoor Sports</td>
<td>1.05</td>
</tr>
<tr>
<td>Grassland Buffer for Bats</td>
<td>6.78</td>
</tr>
</tbody>
</table>

The proposal makes sufficient provision for open space in line with policy and Members are asked to note that the scheme would provide substantial health benefits not only for residents of the development but those living outside it. A Community building would be provided within which changing rooms for the sports pitch can be provided, and which will have the potential to be used for scheduled exercise classes for example. There would be outdoor gym equipment in the form of a trim trail provided within the public open spaces. Childrens’ play areas and ‘trim trails’ are also included, in addition to land to be provided for a skate park. The development would be fully accessible by cycle and a network of footpaths would be included, providing further outdoor recreation and exercise opportunities.

The extensive provision of open space throughout the development will provide significant levels of new green infrastructure in accordance with Policy CP28.

**Impact on the character and visual appearance of the area**

Landscape impact is a key consideration in the assessment of this proposal and to assist in the evaluation of this impact the application is supported by a landscape and visual impact assessment as part of the Environmental Statement (ES) The assessment concludes that although the development would result in a change to the landscape, subject to appropriate design, layout, and landscaping the development would be acceptable in landscape and visual terms.
All development, especially one of this scale, will have an impact of the landscape and the developer has worked with officers to minimise this to an acceptable level. Particular attention has been paid to the eastern edge of the development, which is the more open aspect and shares the boundary with the National Park. Built development will be located away from this boundary as far as possible and building heights will be lower.

A landscape condition will require details of hard and soft landscape at reserved matters, which will include substantial tree planting along the new roads as indicated on the masterplan. The legal agreement would ensure that the structural planting required would be delivered very early on in the development, before commencement of much of the built form. On this basis, it is considered that, whilst there will be some impact in relation to the development of a Greenfield site, any impacts can be properly mitigated and that it is not possible to sustain an objection on visual impact and landscape character grounds. The proposal is therefore broadly in accordance with Policy CS20.

6. Access, movement and highway safety

The application falls within the jurisdiction of both Highways England, as the responsible body for the A3 (M), and the County Council as the Local Highway Authority (HCC LHA).

The application is supported by detailed transport assessments and modelling, contained within chapter 11 of E.S and associated appendix J, and drawing refs. VD18678/100-01 Rev J, VD18678/100-02 Rev G, VD18678/100-03 Rev F, VD18678/100-04 Rev G, VD18678/100-05 Rev G, VD18678/100-06 Rev G, and VD18678/100-07 Rev C.

The proposed highways works are as follows:

<table>
<thead>
<tr>
<th>Location</th>
<th>Works</th>
</tr>
</thead>
<tbody>
<tr>
<td>Havant Road</td>
<td>• Provision of three new access junctions</td>
</tr>
<tr>
<td></td>
<td>• Improvements to the Dell Piece East / Havant Road roundabout to provide access and increase capacity, including the addition of a fourth arm to serve the proposed employment land</td>
</tr>
<tr>
<td></td>
<td>• New footway / cycleways along each side of carriageway</td>
</tr>
<tr>
<td></td>
<td>• Traffic calming measures</td>
</tr>
<tr>
<td>Dell Piece East</td>
<td>• New crossing facilities at the Bridleway</td>
</tr>
<tr>
<td></td>
<td>• Enhanced footway / cycleway</td>
</tr>
<tr>
<td>Pyle Lane</td>
<td>• New vehicle access junction</td>
</tr>
<tr>
<td>Rowlands Castle Road</td>
<td>• Bus only access junction</td>
</tr>
<tr>
<td></td>
<td>• New pedestrian access and link to southern footway</td>
</tr>
</tbody>
</table>
Highways England has considered the application and the alterations to the junctions to accommodate the application and is satisfied that any changes can be safely made. They raise no objection subject to a condition requiring pedestrian and cycle routes linking the east and west sides of the A3 (M) to be carried out before first occupation. Although these works are requested to be carried out prior to first occupation of the development, the applicant has been in discussion with HCC LHA and it has been accepted by HCC LHA that the junction works can be carried out later in the development, for example, prior to first occupation of the 230th dwelling. This is subject to the developer providing a bus service to and from the site to Horndean Technical College as soon as the first secondary school aged child occupies the development. This is to be secured through a S106 legal agreement and the bus service would commence from that point and for a full school term following completion of the Junction 2 works.

Both Highways England and the County Council have commented on the signalisation of Junction 2 of the A3 (M). The scheme proposes a revised junction arrangement to Junction 2 of the A3(M), which incorporates pedestrian and cycle crossing provision, in addition to full traffic signal. Whilst the final detailed design of this junction proposal cannot be agreed at this stage the principle of and details relating to the fully signalising of the junction are accepted, although there is a need for some further detailed development work. The County Council has expressed its agreement that this further work can be secured through the legal agreement.

The County Council as the Local Highway Authority has considered the scheme and concluded that subject to conditions and provisions within a S106 Agreement relating to highway works and relevant financial contributions, that the scheme is considered to be acceptable.

There is a bridleway along the western edge of the site, parallel with the A3(M). This crosses over the motorway via the footbridge in the southwest corner of the site, before running down Sheepwash Lane and northwards through Hazleton Common Nature Reserve.

There are two public rights of way within the site. These are public footpath Horndean 54, part of the Monarch’s Way National Trail, which crosses the northern parcel, connecting Pyle Lane to the B2149 (Havant Road), and bridleway 24b and 502 from Hazelton Common Nature Reserve (to the west of A3(M)), connecting to the B2149 at Dell Piece East.

HCC Countryside Service has raised an objection to the proposed development because they consider there is an absence of any adequate assessment of impact on Rights of Way and users, including equestrians, and no proposals for any improvements for countryside access or enhancement to Rights of Way to mitigate adverse impacts. The application documents confirm that existing public rights of way on site will be retained within areas of greenspace. Internal footpaths will provide links to these and existing footways.
It should also be noted that no surface alterations can be made to a right of way, or any work carried out which might affect its surface, without the prior permission of Hampshire Countryside Service as Highway Authority. A Highway Agreement with the Countryside Service would also be required prior to commencement of vegetation clearance or works which might affect the surface of the Right of Way or stop up or divert a public right of way.

Right of way matters are a consideration under detailed layout, forming a reserved matter, and the HCC Countryside Service would be consulted on all reserved matters applications.

It is considered that the proposal is in accordance with Policy CP31 and saved policies T2, T3 and T4 subject to the imposition of appropriate conditions, agreement of detailed highways requirements through the Section 106 and provision of appropriate details at reserved matters stage.

7. Impact on the amenity of neighbouring occupiers

The detailed layout, design, and landscaping of the proposed development are matters to be dealt with through subsequent reserved matters applications, thus it is not possible to make a fully informed assessment at this stage. However, given the relationship of nearby residential properties to the site and the location of proposed open space, it is considered that a detailed scheme can be designed which will not raise any amenity issues and the policy aims of policy CP27 of the JCS can be complied with.

8. Drainage and flood risk

The site is split into two main catchments: the northern catchment, to the north of Soakfield Row in the site’s northern parcel, and the southern catchment, which covers the rest of the site.

The site is located within Flood Zone 1 (low probability of flooding) and within a Groundwater Source Protection Zone 1.

The application is supported by a detailed Flood Risk Assessment and drainage strategy report, within the ES (Chapter 12 and associated appendix K), which confirms that there will be no net increase in surface water run off as a result of the proposed development. A range of sustainable drainage measures will be used to manage surface water drainage and with the appropriate mitigation measures there will be no adverse impacts on the water environment.

Flood Risk

The layout shows that the built form of development would be located on land that would be within Flood Zone 1, which is at the lowest risk of flooding.
Surface and Foul Water Drainage

The Environment Agency, Portsmouth Water, HCC LLFA, and EHDC Drainage Consultant have considered the scheme and detailed supporting information and raise no objection subject to conditions being attached to any approval requiring details of a scheme of foul and surface water drainage for the development to be submitted to, and approved in writing, by the LPA prior to development commencing.

Water Supply

The Government’s ‘National Planning Practice Guidance’ advises that;

‘Planning for the necessary water supply would normally be addressed through authorities’ strategic policies, which can be reflected in water companies’ water resources management plans Water supply is therefore unlikely to be a consideration for most planning applications.’

In this case, while the development is large in scale, it is an allocated site and the amount of housing is accommodated within scale of housing allocated for Horndean within the Joint Core Strategy, which is supported by an evidence base and a Sustainability Appraisal. Consequently, Officers do not consider there are robust grounds that stand against the scheme based on this issue.

Subject to the appropriate conditions being attached to any approval the proposed development would comply with the aims of policies CP25 and CP26 of the JCS.

9. Impact upon bio-diversity

The site has significant bio-diversity assets as set out in the response from the HCC Ecologist. The application is supported by extensive ecological surveys and proposed mitigation as detailed within the E.S (Chapter 7 and associated appendix F).

It is necessary to ensure that those interests, including European Protected Species, are protected and impacts properly mitigated having regard to policies within the Development Plan and within the NPPF.

The survey information has been accepted by the County Ecologist who has raised no objection to the proposed development subject to conditions being attached to any approval requiring details of ecological mitigation, compensation and enhancement measures, and a Construction Environmental Management Plan to be submitted to, and approved in writing, by the LPA prior to development commencing.

Whilst Natural England has provided comments in respect of a range of matters it has not raised objection to the proposal subject to appropriate mitigation and compensation being secured.
The East Hampshire District Council, as Competent Authority, has undertaken an Appropriate Assessment to consider the development and avoidance/mitigation that will be secured to offset the significant effect on water quality within the Solent Marine environment. In light of the avoidance/mitigation measures secured the Council concludes that there would not be an adverse effect on integrity and no reason, on this basis, for planning permission to be withheld.

Natural England has confirmed that they are welcome the negative nitrogen budget for the scheme, which relies on the provision of significant areas of open space. Nitrogen mitigation measures are required for the scheme to maintain neutrality for the duration of the effect, as is required by the Appropriate Assessment, therefore safeguards are needed to ensure the features of the scheme that have allowed it to secure nitrogen neutrality (or in this case a reduction in Nitrogen levels) are appropriately maintained for the lifetime of the proposals. To achieve this, and in line with the Appropriate Assessment, the development will include a requirement for a maximum water usage level of 110L per day per dwelling, that that open space areas remain as such in perpetuity, and other ecological mitigation/compensation are secured as part of the any approval. These can be secured through appropriate conditions and S106 head of term attached to any approval. The proposal would safeguard existing protected species, enhance their habitats, and offer managed access to parts of the site for the general public.

Subject to the appropriate conditions being attached to any approval, the scheme is acceptable in terms of its impact on bio-diversity and would comply with the aims of policy CP21 of the JCS.

10. Impact on trees

The application is supported by an Arboricultural Impact Assessment and Tree Plan.

There are 889 trees within the site, comprising 127 individual trees, 39 groups of trees (762 trees in total), and 2 woodland compartments.

The scheme includes the retention of the majority of trees within the site with only 21 individual trees out of 121 proposed for removal and 59 trees out of 762 individual trees from groups proposed for removal. i.e. a total of 80 trees out 889 to be removed. Detailed consideration of tree removal/retention and planting will form part of the Reserved Matters.

<table>
<thead>
<tr>
<th>BS Category</th>
<th>Number of individual trees</th>
<th>Number of group Individual trees</th>
</tr>
</thead>
<tbody>
<tr>
<td>U</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>A</td>
<td>4</td>
<td>-</td>
</tr>
<tr>
<td>B</td>
<td>9</td>
<td>20</td>
</tr>
<tr>
<td>C</td>
<td>8</td>
<td>39</td>
</tr>
</tbody>
</table>
The site is subject of four Tree Preservation Orders (TPOs) and although it is advised that some protected trees may regrettably need to be removed to facilitate the development, this would be kept to a minimum.

The trees identified for removal are predominately within the internal areas of the site. Where trees are identified for removal in areas visible to the public, this is for the purpose of highways improvements necessary to deliver the site. The proposed tree loss would not have any significant impact on the character of the development site or the purposes of the South Downs National Park and whilst this loss is unfortunate, it would be adequately mitigated by additional planting and landscaping as part of the any subsequent reserved matters applications.

The EHDC Arboricultural Officer has not raised any objection to the proposal subject to a condition being attached to any approval requiring the submission of a detailed Arboricultural Impact Assessment and Tree Protection Plan at reserved matters stage.

It is proposed to remove some hedging within the site and along Havant Road. Whilst the submitted plans show a large amount of hedge removal along Havant Road (approximately 600-840m), of which some is required to ensure highway safety, the exact level of hedge removal will be determined at reserved matters stage.

Subject to the appropriate condition being attached to any approval, the proposed development would comply with the aims of saved policy C6 of the Local Plan: Second Review and policy CP20 of the JCS.

11. Impact upon heritage and archaeology

Saved Policy HE12 states that development which harms the setting of a listed building will not be permitted. This policy, whilst saved, is not wholly consistent with the NPPF, and cannot be afforded full weight.

Saved Policy HE17 states that development will not be permitted which adversely affects important archaeological sites, buildings, monuments or features, whether scheduled or not, or their settings. It also sets out a requirement for archaeological investigation and recording prior to the commencement of development.

Policy CP29 of the Joint Core Strategy states that seek exemplary standards of design and architecture with a high quality external appearance that respect the area’s particular characteristics.

Policy CP30 (Historic Environment) of the JCS requires development proposals to conserve and, where possible, enhance the District’s historic assets and their setting.
Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires planning authorities, when considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires planning authorities, when considering whether to grant planning permission for development which affects a Conservation Area, to have special regard to the desirability of preserving or enhancing the character and appearance of that area.

The Historic England ‘Historic Environment Good Practice Advice in Planning Note 2’ (March 2015), states at paragraph 4:

‘The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest’ and provides guidance at paragraphs 8, 9 and 10 for the Local Planning Authority in order to make decisions in line with legal requirements, the objectives of the development plan.

The NPPF (2019) sets out in Chapter 16, the core principles relating to development affecting Heritage Assets that local planning authorities should consider in making planning decisions and paragraphs 184, 189, and 190 -194 are particularly relevant.

The cultural heritage resources of the site and its environs as they are identified through designation, the national or local archaeological record, documentary sources or other studies, have been assessed in detail within Chapter 6 of the E.S and associated technical appendix E.

The HCC Archaeologist raises no objection to the development and recommends that the assessment, recording and reporting of any archaeological deposits present should be secured through the attachment of a suitable condition to any planning consent that might be granted. Given the interest in the site the results of the initial evaluation should be available and submitted at least by the time of the reserved matters application to enable it to be part of the design process. This is in accordance with saved policy HE17.

The proposal is adjacent to listed buildings at Pyle Farm, a Grade II Listed historic farmstead. Hook Cottage, a Grade II Listed 18th century house is located north of the site on Rowlands Castle Road.
The NPPF requires, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight to be given to the asset’s conservation. Where there is substantial harm to (or total loss of significance of) a designated heritage asset permission should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss or criteria a) to d) of Paragraph 195 apply. If there is less than substantial harm to the significance of a designated heritage asset then this harm should be weighed against the public benefits of the proposal. (Para 196– NPPF)

These are high tests and the decision maker needs to be aware of the balancing exercise and weight that needs to be given to the desirability of preserving and enhancing heritage asset.

The EHDC Conservation Officer has confirmed that they consider the impact of the proposed development on the designated heritage assets to be one of less than substantial harm. It is necessary, therefore, for the decision maker to balance the public benefits of the scheme against the harm to the designated heritage assets. This also has to be considered in light of the requirement to give great weight to an assets conservation and the desirability of conserving and enhancing the significance of such assets.

The benefits of the scheme include the need to provide housing within Horndean and also the provision of affordable housing on an allocated site. There is the consideration that this is a sustainable development which will provide net benefits to bio-diversity and improvements to pedestrian and cycle links to the National Park, Horndean and Hazelton Common. There also community benefits arising from the proposed primary school, local centre, community building, skate park, sports pitch, and extensive public open space within the development that will be accessible to those both within and outside of the development.

Furthermore, the scheme will provide employment land and ‘A’ class use commercial units, further increasing its sustainability credentials as well as that of Horndean generally.

It is considered, therefore, that the public benefits of the scheme, as set out above, outweigh the harm to the heritage assets and therefore the test set out in paragraph 196 of the NPPF as well as the statutory test has been satisfied. When considered against Policy CP30, the benefits of the scheme are considered to outweigh the harm to the heritage assets affected.

Subject to the appropriate archaeology based conditions being attached to any approval, it is considered that the proposal is in accordance with the Government advice contained within the NPPF.

12. Ground contamination

The site lies within a groundwater source protection zone, a groundwater drinking water protected area and a groundwater safeguard zone, which are designated to protect the quality of drinking water supplied to the Portsmouth area.
Detailed contamination and drainage surveys of the site have been carried out to inform the proposed development (Chapter 12 of the E.S and associated appendix K) and the Environment Agency, Portsmouth Water, HCC LLFA, and EHDC Environmental Health (Contamination) Officer have confirmed that they raise no objections to the proposed subject to appropriate conditions being attached to any approval in respect of the discovery any unsuspected contamination within the site during construction, its remediation, and validation of any remediation carried out.

Subject to the appropriate conditions being attached to any approval the proposed development would comply with the aims of saved policy P7 of the Local Plan: Second Review and policy CP26 of the JCS.

13. Noise, light, and air pollution

The application is supported by an Air Quality Assessment (Chapter 4 of the E.S and associated appendices), noise assessment (Chapter 10 of the E.S and associated appendix D), and lighting assessment (Chapter 9 of the E.S and associated appendices).

The Council’s Environmental Health (Pollution) Officer has reviewed the submitted assessments and has commented that they are satisfied that the background sound levels have been suitably quantified, and that the assessment of impact identifies appropriate sensitive receptors. They advise that the preliminary construction noise assessment indicates that no significant adverse impacts are predicted, although there may be temporary increases above the daytime 75dBLAeq, 10hr at receptors closest to construction site boundaries.

The noise report also assesses the site suitability. The preliminary assessment indicates that there are properties within the proposed development in the Southern parcel, close to the A3(M) and B2149 which are likely to require uprated acoustic glazing and acoustic trickle ventilation. Furthermore, the outdoor sound levels are predicted to exceed desired design targets at these locations. The Council’s Environmental Health (Pollution) Officer recommends conditions be attached to any approval requiring a detailed assessment of site suitability to be submitted to the LPA at the detailed design stage, to determine the exact acoustic specifications of any mitigation measures required for the proposed development, a detailed construction noise assessment to be submitted to the LPA for approval once a detailed construction method statement and construction programme are available, and an assessment following the guidance contained in BS 4142:2014 'methods for rating and assessing industrial and commercial sound' to be submitted to the LPA for approval at the detailed design stage, to determine and minimise noise impacts to sensitive receptors nearby from these noise sources.

In addition, a detailed assessment of site suitability is to be submitted to the LPA at the detailed design stage, to determine the exact acoustic specifications of any mitigation measures required for the proposed development, to ensure a suitable sound climate internally and externally.
The Council’s Environmental Health (Pollution) Officer has also reviewed the lighting and air quality assessment and is satisfied that no significant adverse effects are predicted on human health. They advise that the dust assessment within the air quality report indicates the potential for impacts. However, with implementation of the dust mitigation measures detailed in Table 4.13 of chapter 4 of the E.S, they are satisfied that dust emissions can be adequately controlled. These measures are also detailed in the draft Construction Environmental Management Plan included with the submission, and a finalised CEMP (also detailing environmental management and mitigation measures) will be required to be submitted to, and approved in writing, by the LPA the Council prior to development commencing.

Subject to the appropriate conditions being attached to any approval, the proposal is considered to be in accordance with the aims of Policy CP27 of the JCS.

14. Sustainable construction

The application is supported by a Sustainability Statement, within which there is a commitment to achieving the relevant building construction energy saving targets set by local policy.

Under the provisions of policy CP24 of the JCS requires new residential development to achieve Code for Sustainable Homes Level 5 in terms of energy saving. However, since the adoption of the Core Strategy, the Code for Sustainable Homes has been abolished. New residential development is now required to provide at least 10% of energy demand from decentralised and renewable or low carbon energy sources or from savings in energy requirements and this can be secured through an appropriately worded condition attached to any approval.

Under the provisions of policy CP24 new commercial development over 500m² is required to achieve a BREEAM rating of no less than ‘excellent’ and this too can be secured through an appropriately worded condition attached to any approval.

15. Infrastructure and CIL/developer contributions

JCS policy CP32 (and saved policies HC2 and HC3) states that where the provision or improvement of infrastructure is necessary to meet community or environmental needs associated with new development or to mitigate the impact of development on the environment, the payment of financial contributions will be required through planning obligations and/or the Community Infrastructure Levy (CIL) to ensure that all such development makes an appropriate and reasonable contribution to the costs of provision.

Subsequent to the original outline approval, EHDC CIL was implemented on the 8th April 2016. This enables the Council to raise, and pool, contributions from developers to help fund additional infrastructure required to support new development including roads, schools, green spaces and community facilities. EHDC CIL is the principal means by which pooled developer contributions towards providing the necessary infrastructure should be collected except for affordable housing.
The Council’s ‘Planning Contributions and Community Infrastructure Levy’ Supplementary Planning Documents lists C3 (residential) and A1 (retail) uses as CIL liable and thus these would now attract a CIL contribution. Members are made aware that under the CIL charging regulations, the CIL contribution from the development will now replace some obligations previously secured under the original S106 legal agreement.

To meet the provisions of the JCS and saved Local Plan policies, the proposal would secure the provision of 40% affordable housing, a new primary school, sports facilities and a community building. Contributions towards the following would also be secured via S106 obligation:

- Employment and training package
- Travel plan
- Integrated transport measures
- Community project worker

Other contributions will be based on the requirements set out in the Council’s SPD (Guide to Developer Contributions 2016). In this respect the scheme would attract needs for contributions towards a community project worker resource to help facilitate social integration between housing types/tenures within the scheme and the payment of the Council’s legal and S106 monitoring fees.

A S106 covering any planning permission would also secure the following (a full list of Heads of Terms at Appendix 2):

- Provision, maintenance and management in perpetuity of landscape planting and ecology buffers
- On-site provision of public open space and children’s play space and management and maintenance in perpetuity.
- Matters of general management and maintenance in perpetuity of other common areas including of the access and estate roads, surface water drainage systems.
- Tenure split for affordable housing, stipulating 30% intermediate (shared ownership) and 70% affordable rent, unless otherwise agreed in writing by the Council.
- Occupancy criteria stipulating a cascade for occupancy of affordable rent units within the settlement, then adjoining parishes and then wider to the District.
- 5% of affordable housing in each phase to be fully wheelchair accessible, with size, type and tenure to be agreed with Housing Services Manager
- The affordable housing mix
- Provision of the employment land for development, the new school and local centre.

- Transport contribution to be used towards highway improvement measures, improvements to sustainable modes of transport, and other measures that provide direct benefit to the site.

- Implementation of offsite highway works as shown in principle on drawings
  
  VD18678/100-01 Rev J  
  VD18678/100-02 Rev G  
  VD18678/100-03 Rev F  
  VD18678/100-04 Rev G  
  VD18678/100-05 Rev G  
  VD18678/100-06 Rev G  
  VD18678/100-07 Rev C  

- Financial contribution to deliver the proposed signalised crossing points at Dell Piece East and B2149.

- To achieve the necessary speed reduction on Havant Road and Rowlands Castle Road to accommodate the required access visibility.

- Submission and implementation of a full Travel Plan, payment of the Travel Plan approval and monitoring fees, and provision of a surety mechanism to ensure implementation of the Travel Plan.

- Submission to the Council for approval of the marketing strategy to dispose of the employment land.

- Submission to the Council for approval of the provision of public open space and community facilities on land, including, sports pitch, allotment, LEAPs, trim trail, semi-natural open space, informal open space, grassland buffers, ecology buffers, woodland, existing and proposed trees, provision of land for skate park, shrub planting, structural planting and footpaths, and car parking.

- Completion of the allotments in accordance with an agreed specification.

- Payment of a cricket pitch and pavilion contribution in lieu of on-site provision.

  Note: should application ref 55562/006/OUT be approved, it would be subject to the on-site provision of a cricket pitch and pavilion. If the 55562/006 scheme is implemented, the monies paid under this obligation would be returned to the developer.

- Land for and completion of the community building in accordance with specification.
• Provision of serviced land for a skate park and payment of a skate park contribution

• Provision of access and services to the primary school land

Members are also asked to note that under the current CIL charging regulations Local authorities are required to allocate 15% of levy receipts from development within the Town or Parish area up to a maximum of £100 per existing council tax dwelling per annum to spend on priorities that should be agreed with the local community in areas where development is taking place. This is a significant gain over the previous outline approval, where there was no such requirement. The estimated CIL receipt for this development is approximately £6.2 million pounds and this will be used to fund:

- Financial contribution to South Eastern CCG for enhancement of local GP surgery/ies
- Financial contribution to HCC Education Authority for construction of 1FE school within the site
- Some modest highway improvements
- Off-site community facilities
- Parish Councils CIL contribution

16. Environmental Impact Assessment

The proposed development was screened and found to fall within Schedule 2 Development of the Environmental Impact Assessment regulations and required an Environmental Statement to be submitted with the application due the size of the development and its proximity to the protected landscape of the SDNP.

A development of this scale, located on mostly greenfield land, has the potential to result in a significant change to the landscape if not mitigated. The SDNP adjoins the site and whilst there is not an ‘in principle’ objection to the development, concerns have been raised by SDNP in terms of the potential landscape impact of the development. Submitted parameter plans indicate areas of proposed built form and open space and which been necessarily influenced by the location of a high pressure gas main crossing the site and protected species habitats. This notwithstanding, as with the previous outline approval, a detailed scheme can be delivered which sites any built form as far as possible from the parcel boundaries with the SDNP, uses lowered building heights near these boundaries, and which utilises structural planting to create a buffer and retain a semi-rural character to the development.

All other environmental impacts of the development can also be suitably mitigated for with the attachment of appropriate conditions and S106 obligations to any approval, and through further consideration at detailed reserved matters stage.
17. Other material considerations and relevant planning issues raised by objectors

Comments have been raised that the development does not address the Climate Change Emergency. Whilst the Council has declared an Emergency, this does not have any links in policy terms other than the general links in the NPPF. The necessary policy change would come about through the emerging new Local Plan. However, that is at a very early stage and currently does not carry any weight. Whilst the Climate Change Emergency is a material consideration, it does not carry any significant weight at this point in time. Notwithstanding this, conditions will be put in place to ensure that the new residential development provides at least 10% of energy demand from decentralised and renewable or low carbon energy sources or from savings in energy requirements and new commercial development over 500m2 is required to achieve a BREEAM rating of no less than ‘excellent’.

Officers consider that all outstanding objections and concerns have been satisfactorily addressed, will be dealt with at detailed stage or are outweighed by the benefits delivered by the proposal.

**Conclusion**

The settlement of Horndean has a requirement to provide a minimum of 700 dwellings with the plan period set out in the Joint Core Strategy. This site is allocated within the EHDC Housing and Employment Land Allocations (2016) for the quantum of development proposed, aside from a now proposed increase of 100 dwellings.

This outline application follows the recently elapsed outline application 55562/001/OUT in respect of the same development except that 800 dwellings are now proposed as opposed to the previously approved 700 dwellings. The relocation of the school, community building, sports pitch, and local centre to the centre of the development from the previously approved north-west corner of the southern parcel is to the betterment of the scheme in terms of accessibly and ‘place-making’. Similarly, the relocation of the allotments to the northern part of the site will ensure that they are accessible to new and existing local residents.

The additional access to the southern parcel of Havant Road is acceptable in highway terms and as with the previous consent both Highways England and HCC HA have raised no objections subject to the appropriate conditions and S106 heads of terms attached to any approval.

There will, inevitably for a development of this scale and significance, be a number of adverse impacts.

Chief amongst these will be the landscape and visual impact of the development, particularly in respect to its impact on the South Downs National Park, and also on the designated heritage assets detailed above. There is also the direct loss of trees as a result of the development. These should be given significant weight, but have to be weighed against the extensive public benefits that the scheme will bring.
The main benefit is the provision of housing, a major requirement of both national and local policy. Whilst the District is able to demonstrate a five year housing land supply, there is still a residual requirement to provide housing within Horndean within that supply and this should be given significant weight. It should also be noted that even though there is, at present, a five year housing land supply, it is still necessary to grant applications that comply with the development plan in order to maintain that supply.

The provision of a policy compliant level of affordable housing and net benefits to bio-diversity together with improved public access to recreation land are all considered to be significant public benefits. There will also be a net increase in planting throughout the site which will effectively mitigate the visual impacts of the development as well as the trees lost through the impact of the development.

The scheme will provide substantial health benefits not only for residents of the development but those living outside it. A community building will be provided, which will have the potential to be used for scheduled exercise classes, for example, and there will be a sports pitch and a trim trail provided within the public open spaces. Children's play areas are also included, in addition to land provided for a skate park. The development will be fully accessible by cycle and a network of footpaths will be included, providing further outdoor recreation and exercise opportunities.

Detailed matters of design, layout, and landscaping would be determined at reserved matters stage and subject to the appropriate conditions and S106 heads of terms being attached to any approval, the development is acceptable in ecology, drainage, contamination/pollution, sustainability, arboricultural, archaeology and landscape terms.

These benefits are considered together, to weigh heavily in favour of the scheme and outweigh the harm identified in the report. There are no material considerations that indicate that a decision should be made, other than in accordance with the development plan.

It is, therefore, considered that the application is policy compliant and constitutes sustainable development, in line with the aims of local and national policy.

**RECOMMENDATION**

A. the solicitor to the Council be authorised to draw up a Section 106 legal agreement and;

B. provided that by October 2020 all relevant parties enter into the Section 106 agreement with the Council to secure:

   i. employment and training package, and delivery of employment allocated land on site (no later than phase 2) and provision of road connection to employment land boundary via Dell Piece East / Havant Road roundabout of adoptable standard;
ii. Transport contribution to be used towards highway improvement measures, improvements to sustainable modes of transport, and other measures that provide direct benefit to the site.

iv. Provision of a 1.2ha site for a school on-site

v. Provision of structural planting early in the development and future maintenance and management

vi. Provision, management and maintenance of sports facilities, public open space and allotments;

vii. Provision, management and maintenance of surface water drainage system (including SUDs) and foul drainage system;

viii. Provision, management and maintenance in perpetuity of landscape planting and ecology buffers;

ix. Matters of general management and maintenance in perpetuity of other common areas including of the access and estate roads;

x. Provision of 40% affordable housing and tenure split for affordable housing, stipulating 30% intermediate (shared ownership) and 70% affordable rent;

xi. Occupancy criteria stipulating a cascade for occupancy of affordable rent units within the settlement, then adjoining parishes and then wider to the District;

xii. A review of the provision of the Affordable Housing Supply, mix and allocation prior to the commencement of each phase of the development;

xv. Community project worker contribution

then the Director of Regeneration and Place be authorised to:

   a) Make minor changes to conditions, as necessary, with agreement of Chairman and Ward Councillors, and
   b) grant OUTLINE PERMISSION subject to the following conditions.

However, in the event that a satisfactory S106 agreement to secure points i. to xv. above is not completed by October 2020, then permission will be refused under the Councils adopted scheme of delegation, unless an extension of time is agreed by Chairman of this Committee.
Conditions

1. The development hereby permitted shall commence within five years of the date of consent or before the expiration of two years from the date of approval of the first reserved matter, whichever is the latter, and the remainder of the development shall be begun not later than two years from the final approval of the last reserved matters to be approved.

Application for the approval of the first reserved matters shall be made to the Local Planning Authority before the expiration of two years from the date of this permission.

Application for approval of all reserved matters shall be made to the Local Planning Authority within seven years from the date of this permission.

Reason - To comply with the provisions of Section 92(2) of the Town and Country Planning Act, as amended by Section 51(1)(a) of the Planning and Compulsory Purchase Act 2004.

2. The submission of all reserved matters and the implementation of the development hereby permitted shall be carried out in accordance with the following approved drawings:

RG- M_01 rev F - Site location plan
RG -M- 22 rev G - Land use and access parameter plan
RG-M-23 rev F - Trees and buildings parameter plan
VD18678-100- 01J - General Arrangement sheet 1 of 7
VD18678/ 100- 02G - General Arrangement sheet 2 of 7
VD18678/ 100- 03F - General Arrangement sheet 3 of 7
VD18678/ 100- 04G - General Arrangement sheet 4 of 7
VD18678/ 100- 05G - General Arrangement sheet 5 of 7
VD18678/ 100- 06G - General Arrangement sheet 6 of 7
VD18678/100- 07C - General Arrangement sheet 7 of 7

Application Form
CIL Form Assumption of Liability
Ground Condition Assessment and Ground Investigation Report
Agricultural Land Classification and Soil Resources
Review of Minerals Safeguarding
Information for Habitats Regulations Assessment
Sustainability Statement
Arboricultural Impact Assessment & Tree Report
Utilities Assessment
Planning Supporting Statement
Statement of Community Involvement
Design and Access Statement
Environmental Statement Volume 1 of 4
Environmental Statement Volume 2 of 4
Environmental Statement Volume 3 of 4
Environmental Statement Volume 4 of 4
Factual Report
Reason - To ensure provision of a satisfactory development.

3. Prior to the commencement of development, a scheme detailing the phasing, and any sub-phasing, of the construction of the development shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason - To secure the phasing of, and an orderly pattern of development and help manage and monitor the reserved matters and conditions related to this.

4. Prior to the commencement of development in any phase or sub-phase, plans and particulars showing the detailed proposals for the following aspects of the development of the individual phase, where appropriate, shall be submitted to and approved in writing by the Local Planning Authority. These details shall comprise the 'reserved matters' and shall be submitted within the time constraints referred to in Condition 1 and comprise:-
a) Access: meaning the accessibility within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network;

b) Appearance: meaning the aspects of any building or place within the development which determine the visual impression the building or place makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture;

c) Landscaping: meaning the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area/wider context in which it is situated (including the adjacent South Downs National Park) and includes screening by fences, walls or other means, the planting of trees, hedges, shrubs or grass, the formation of banks, terraces or other earthworks, the laying out or provision of gardens, courts or squares, water features, sculpture, or public art, and the provision of other amenity features and includes strategic landscaping, including landscaping along the boundary with the South Downs National Park;

d) Layout: meaning the way in which buildings, routes and open spaces within the development are provided, situated and orientated in relation to each other and to buildings and spaces outside the development including connectivity with the South Downs National Park and Havant Thicket;

e) Scale: meaning the height, width and length of each building proposed within the development in relation to its surroundings;

The reserved matters application/s shall also include the following detail and information:

f) A site survey showing the position, type and spread of all existing trees on the site and a schedule detailing the size and a schedule detailing the size and physical condition of each tree and, where appropriate, the steps to be taken to bring the tree(s) to be retained to a satisfactory condition and also details of any proposals for the felling, lopping, topping or up-rooting of any tree;

g) Arrangements to be made for the future maintenance of landscaped and other open areas;

h) Details of the existing and proposed ground levels, proposed finished floor levels, levels of any paths, drives, garages and parking areas and the proposed completed height of the development and any retaining walls. The details shall clearly identify the relationship of the proposed ground levels and proposed completed height with adjacent buildings and any trees (including protected trees) to be retained.

i) The provision to be made for the parking, turning, loading and unloading of vehicles;

j) Details of a scheme for foul and surface water drainage to include the
layout of foul sewers and water drains;
k) The provision of street lighting, street furniture, lighting (including security lighting), bollards etc;

l) The provision to be made for the storage and removal of refuse from each part of the development;

The development shall be implemented in accordance with the approved details.

Reason - To comply with Article 5 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 and to ensure that there is a satisfactory relationship between the new development and adjacent buildings, retained (including protected) trees and public areas.

5. The relevant reserved matters application(s) shall identify all areas of employment land that are to be used to store potentially polluting material, or vehicles. Such areas must be underlain by an impermeable surface which prevents drips or spills infiltrating into the ground. The surface must be designed to ensure that all run off from such areas drains efficiently via appropriately sized interceptors before entering the site surface water collection system.

The scheme shall include details of impermeable surfacing and how the interceptors will be maintained and managed after completion. Chemicals and hydrocarbons must be stored within a bunded area capable of containing 110% of the capacity stored. The scheme shall be submitted to and approved in writing by the local planning authority before works commence on each relevant phase or sub-phase.

The works shall be implemented fully in accordance with the approved prior to the occupation of development in that phase or sub-phase.

Reason - The site lies within the Groundwater Source Protection Zone 1 for the Havant and Bedhampton Springs, a public drinking water supply.

Solution features and karstic fissures connected to the Havant & Bedhampton Springs are known to be present in this area which increases the risk of pollutants entering groundwater and travelling rapidly without attenuation to pollute the public drinking water supply.

The purpose of incorporating interceptors in to the design is to capture any hydrocarbons and other contaminants to break the pollutant chain.

6. Prior to occupation of any phase or sub-phase of development where external building services and plant is to be provided, an assessment following the guidance contained in BS 4142:2014 “methods for rating and assessing industrial and commercial sound” shall be carried out. This assessment shall be submitted to and approved by the local planning authority at the reserved matters stage of the relevant phase or sub-phase, to determine and minimise noise Impacts to sensitive receptors nearby from these noise sources.
Development in the phase or sub-phase shall be carried out in accordance with the approved details.

**Reason** - To comply with the requirements of Policy CP27 of the East Hampshire Core Strategy and to ensure that potential adverse noise impacts are mitigated and reduced to a minimum and significant adverse impacts on health and quality of life are avoided, in accordance with paragraph 180 of the NPPF, 2019

7. Prior to the commencement of development within any phase or sub-phase of development, an assessment of site suitability for that phase or sub-phase shall be submitted to and approved by the local planning authority to determine the exact acoustic specifications of mitigation measures required, to ensure a suitable sound climate internally and externally.

The assessment shall only be required for areas identified in Technical Appendix I Noise and Vibration of the Environmental Statement, December 2018 as requiring mitigation.

Development shall be carried out in accordance with the approved details.

**Reason** - To ensure the provision of a satisfactory residential environment for future residents in accordance with Policy CP27 of the East Hampshire Core Strategy and paragraphs 170 and 180 of the NPPF, 2019.

It is considered necessary for this to be a pre-commencement condition as these details need to be agreed prior to the construction of the development and thus go to the heart of the planning permission.

8. Prior to the commencement of development within any phase or sub-phase of development, details of provision for the storage and recycling of refuse for that phase or sub-phase shall be submitted to and approved in writing by the Local Planning Authority. Such provision shall be made/constructed prior to the first occupation of the building(s) in that phase or sub-phase and shall thereafter be made permanently available for the occupants of the building(s) in that phase or sub-phase.

**Reason** - To preserve the residential and visual amenities of the locality, having regard to Policy CP24 of the East Hampshire Core Strategy, together with the requirements of paragraphs 8, 127 and 170 of the National Planning Policy Framework 2019.

It is considered necessary for this to be a pre-commencement condition as these details need to be agreed prior to the construction of the development and thus go to the heart of the planning permission.

9. Prior to the commencement of development within any phase or sub-phase, including site clearance, a Construction Environment Management Plan (CEMP) for that phase or sub-phase, which shall reflect the submitted Environmental Statement, December 2018, shall be submitted to and agreed in writing by the Local Planning Authority. The CEMP shall include (but not be limited to):
• specifications for construction timing and logistics including a programme for demolition and
construction work, construction traffic management, including details of contractor parking,
access and egress of plant and machinery and hours of construction and deliveries and
delivery routing;
• the location of temporary site buildings, construction compound(s) and storage of plant,
machinery, construction materials and any spoil

• details of provision for storage, collection and disposal of rubbish and
recycling from the development during construction

• details of the re-use of on-site materials and spoil arising from site clearance, demolition and
construction

• specific measures to avoid or mitigate damage and disturbance to important species and
habitats, and the wider area

• measures to control surface water runoff

• details of any facilities for the storage of oils, fuels or chemicals associated with this
development, or phase of development, shall be submitted to and approved by the Local
Planning Authority. The details shall include:

  o secondary containment that is impermeable to both the oil, fuel or chemical and water, with
    no opening used to drain the system.

  o a minimum volume of secondary containment of at least equivalent to the capacity of the
tank plus 10% and if there is more than one tank in the secondary containment
the capacity of the containment should be at least the capacity of the largest tank plus 10% or
25% of the total tank capacity, whichever is greatest.

  o all fill points, vents, gauges and sight gauge located within the secondary containment.

  o associated above ground pipework protected from accidental damage.

  o all fill points and tank vent pipe outlets designed to discharge downwards into the bund.

  o Plant and machinery to be inspected daily to check for leaks and faulty equipment;

  o Training and awareness of Contractors to incorporate pollution prevention and spill
response procedures

• pollution prevention measures including reporting mechanisms in respect of incidence which
may result in pollution (including details of Environment Agency Incident Hotline and contact
details of the Catchment Management Team at Portsmouth Water)

  • Details of plant fuelling, identifying where will it occur and how it will be contained;
• measures to control the emission of dust, noise and vibration. (This shall include a detailed
collection noise assessment. It shall also include mitigation measures to be
applied during the demolition and construction process to minimise disturbance to sensitive
receptors, which shall be identified as part of the assessment). Any approved mitigation
measures should be reviewed at an agreed frequency and any further mitigation required
mitigation undertaken;

• specific measures to avoid or mitigate damage and disturbance to important
species and habitats

• details for the protection of pedestrian routes including public rights of way during
construction

• details of site registration under the Considerate Contractors scheme

Demolition and construction shall take place in accordance with the approved CEMP for that
phase or sub-phase, unless otherwise agreed in writing by the Local Planning Authority.

Reason - In order that the Planning Authority can properly consider the effect of the works on
the amenity of the locality, to safeguard the amenities of occupiers of nearby properties and
the environmental amenities of the immediate locality in accordance with Policy CP27 of the
East Hampshire Core Strategy 2014 and paragraph 180 of the NPPF, 2019, to protect
biodiversity in accordance with the Conservation Regulations 2017, Wildlife & Countryside Act
1981, the NERC Act (2006), NPPF and with Policy CP21 of the East Hampshire District Local
Plan: Joint Core Strategy, and to ensure that the any storage, of oils, fuels or chemicals does
not harm groundwater resources in line with Policy CP26 of the East Hampshire Core
Strategy and paragraph 170 of the NPPF.

It is considered necessary for this to be a pre-commencement condition as such details need
be taken into account in the construction of the development and thus go to the heart of the
planning permission.

10. Prior to the commencement of development within any phase or sub-phase a scheme
shall be submitted to, and agreed in writing by the Local Planning Authority, demonstrating
that the built development hereby permitted in that phase or sub-phase incorporates
measures that provide at least 10% of energy demand from decentralised and renewable or
low carbon energy sources.

Prior to each plot being occupied on any phase or sub-phase of the development, a
verification report and completion certificate shall be submitted in writing to the Local Planning
Authority confirming that the built development hereby permitted has been constructed in
accordance with the approved scheme.

The developer shall nominate a competent person for the purpose of assessing and providing
the above required report and certificate to confirm that the completed works incorporate such
measures as to provide these requirements. The measures shall thereafter be retained and maintained to the agreed specification for the lifetime of the development.

**Reason** - To ensure that the development incorporates necessary mitigation and adaptation measures with regard to climate change in accordance with Policy CP24 of the East Hampshire District Local Plan: Joint Core Strategy and paragraphs 150 and 153 of the NPPF.

It is considered necessary for this to be a pre-commencement condition as these details relate to the construction of the development and thus go to the heart of the planning permission.

11. Prior to the commencement of development within any phase or sub-phase, a detailed Landscape and Ecological Enhancement, Mitigation and Management Strategy shall be submitted to and agreed in writing by the local planning authority. The strategy for that phase or sub-phase shall be in accordance with the outline ecological mitigation and enhancement measures detailed within the Environmental Statement (Terence O'Rourke, December 2018), Environmental Statement Technical Appendix C (December 2018) and Technical Response (EPR, July 2019) unless otherwise agreed in writing by the Local Planning Authority. The Strategy shall include (but not be limited to):

- details of all habitat- and species-related avoidance and mitigation measures (e.g. timings, methods, responsibilities);
- plans of, and details describing, all habitat impacts and measures to compensate impacts (e.g. location, methods of establishment, responsibilities, care and maintenance);
- measures to achieve a biodiversity net gain through a range of enhancement measures including the provision of bat boxes, starling, swallow and house sparrow nest boxes, stag beetle loggeries, deculvert the stream running through the northern parcel and seek opportunities for the establishment of locally appropriate semi-natural wetland communities within proposed blue infrastructure features. ;
- plans and details of all habitat and species-related enhancement measures (e.g. location, methods, responsibilities, care and maintenance);
- a programme of ongoing ecological monitoring;
- a strategy for managing access to important woodland habitats within the to minimise disturbance of protected species following occupation of any part of the development

**Reason** – To ensure that the natural environment and any protected species which occupy
the site are protected in accordance with the Conservation of Habitats and Species Regulations 2017, Wildlife & Countryside Act 1981 (as amended), the Natural Environment and Rural Communities Act 2006, paragraph 175 of the NPPF, Policy CP21 of the East Hampshire District Local Plan: Joint Core Strategy and Policy HN1 of the East Hampshire District Local Plan: Housing and Employment Allocations DPD.

It is considered necessary for this to be a pre-commencement condition as such details need to be taken into account in the construction of the development and thus go to the heart of the planning permission.

12. Prior to the commencement of development within any phase or sub-phase, which shall include any felling of trees, demolition, or other alteration of the existing condition of the site at the date of this permission, the following information related to that phase or sub-phase shall be submitted to and approved in writing by the Planning Authority:-

- Arboricultural Impact Assessment and scaled Tree Removal/Retention Plan linked to a proposed layout and a detailed Arboricultural Method Statement, which shall include the exact location, assessment of condition and size by stem diameter, species and accurate crown spread of all trees, over 100mm stem diameter at 1.5 metres above existing adjacent ground level, on the site and indicating those trees proposed to be felled and the root protection areas and positions and details of protection measures to be employed during building operations;

- details of proposed hard surfaced areas and service routes within the root protection areas;

- existing and final intended levels across the site adjacent to any existing tree group;

The works shall be carried out in accordance with the approved details.

Reason - To safeguard existing trees and ensure the enhancement of the development, through their retention. by the retention of natural features in accordance with Policy CP20 of the East Hampshire District Local Plan: Joint Core Strategy.

It is considered necessary for this to be a pre-commencement condition as such details need to be taken into account in the construction of the development and thus go to the heart of the planning permission.

13. Prior to the commencement of development within any phase or sub-phase plan, a lighting strategy for that phase or sub-phase shall be submitted to and approved in writing by the local planning authority. The lighting strategy shall reflect the mitigation measures set out in chapter 9 of the Environmental Statement paragraph 9.49. The approved scheme shall be implemented and thereafter maintained in accordance with the approved scheme.

Reason - In the interests of the residential amenity of the area, to ensure a quality development in accordance with Policies CP27 and CP29 of the East Hampshire Core
Strategy and to take account of protected species in accordance with Policy CP21 of the East Hampshire Core strategy.

It is considered necessary for this to be a pre-commencement condition as these details need to be agreed prior to the construction of the development and thus go to the heart of the planning permission.

14. Prior to the commencement of any phase or sub-phase of the development, a programme of archaeological work in accordance with a written brief, specification and timetable for a scheme of investigation for that phase or sub-phase of development has been submitted to and approved in writing by the Local Planning Authority. It shall thereafter be implemented in accordance with the approved details.

Following completion of the archaeological fieldwork for that phase or sub-phase a report shall be produced in accordance with the further written scheme including, where appropriate, post-extraction assessment, specialist analysis and reports, publication and public engagement, and submitted to the Local Planning Authority.

Reason – To contribute to our knowledge and understanding of our past by ensuring that opportunities are taken to capture evidence from the historic environment and to make this publicly available.

To ensure that an historic record is made of the site given it is potentially of archaeological significance and in accordance with Policy CP30 of the East Hampshire Core Strategy 2014 and paragraph 199 of the NPPF, 2019.

It is considered necessary for this to be a pre-commencement condition as these details need to be agreed prior to the construction of the development and thus go to the heart of the planning permission.

15. Prior to the commencement of any phase or sub-phase of development, a detailed surface water drainage scheme for that phase or sub-phase, based on the principles within the Flood Risk Assessment & Drainage Strategy ref: A231-R002B (July 2019) and Preliminary Drainage Zoning Plan ref: TN003 (Technical Appendix K of Environmental Statement), shall be submitted and approved in writing by the Local Planning Authority. The submitted details should include:

a. A technical summary highlighting any changes to the design from that within the approved Flood Risk Assessment.

b. Infiltration test results undertaken in accordance with BRE365 and providing a representative assessment of those locations where infiltration features are proposed.

c. Detailed drainage plans to include type, layout and dimensions of drainage features including references to link to the drainage calculations.

d. Detailed drainage calculations to demonstrate existing runoff rates are not exceeded and
there is sufficient attenuation for storm events up to and including 1:100 + climate change.

e. Evidence that urban creep has been included within the calculations.

f. Confirmation that sufficient water quality measures have been included to satisfy the methodology in the Ciria SuDS Manual C753. g. Exceedance plans demonstrating the flow paths and areas of ponding in the event of blockages or storms exceeding design criteria.

The phase or sub-phase of development shall be carried out in accordance with the approved details.

Reason - To ensure that any proposed surface water drainage scheme does not increase flood risk elsewhere in accordance with Policy CP25 of the East Hampshire Core Strategy and paragraph 163 of the NPPF, 2019

It is considered necessary for this to be a pre-commencement condition as these details need to be agreed prior to the construction of the development and thus go to the heart of the planning permission.

16. Prior to the commencement of any phase or sub-phase of development, details demonstrating how all roads and parking areas within that phase or sub-phase will be carefully constructed to ensure that all drainage discharges through appropriately sized interceptors, before passing in to the surface water drainage system shall be submitted to and approved by the local planning authority. The scheme shall be designed to ensure that run off does not pose any potential risk to groundwater quality by way of contamination or adverse effect on turbidity. The scheme shall include details of how the interceptors will be maintained and managed after completion.

The works shall be implemented fully in accordance with the approved details before the development in that phase or sub-phase is occupied.

Reason - The site lies within the groundwater Source Protection Zone 1 for the Havant and Bedhampton Springs, a public drinking water supply. Solution features and karstic fissures connected to the Havant & Bedhampton Springs are known to be present in this area which increases the risk of pollutants entering groundwater and travelling rapidly without attenuation to pollute the public water supply. The purpose of incorporating interceptors in to the design is to capture any hydrocarbons and other contaminants to break the pollutant chain.

To accord with Policy CP26 of the East Hampshire Core Strategy

It is considered necessary for this to be a pre-commencement condition as such details need to be taken into account in the construction of the development and thus go to the heart of the planning permission.

17. Prior to the commencement of any phase or sub-phase of development, a scheme to dispose of foul water for that phase or sub-phase shall be submitted to and approved in
writing by the Local Planning Authority. The scheme shall also include but not be limited to:

- A timetable for implementation of the approved scheme
- Details of how the scheme shall be maintained and managed after completion.
- Details of the sewage pipe work layout and specifications.

Note: The use of borehole soakaways will not be accepted at this site.

The scheme shall be carried out in accordance with the approved details prior to any part of the development in that phase or sub-phase being occupied and shall be retained thereafter.

**Reason** - To ensure adequate provision for foul drainage and to ensure that any foul water drainage arrangements do not harm groundwater resources in line with paragraph 170 of the NPPF.

It is considered necessary for this to be a pre-commencement condition as such details need to be taken into account in the construction of the development and thus go to the heart of the planning permission.

18. Prior to the commencement of any phase or sub-phase of development, the following details to deal with the risks associated with contamination of that phase or sub-phase, shall be submitted to and approved, in writing, by the local planning authority in consultation with the Environment Agency and Portsmouth Water:

(a) a scheme outlining a site investigation and risk assessments designed to assess the nature and extent of any contamination on that phase or sub-phase.

(b) a written report of the findings which includes, a description of the extent, scale and nature of contamination, an assessment of all potential risks to known receptors, an update of the conceptual site model (devised in the desktop study), identification of all pollutant linkages and unless otherwise agreed in writing by the Local Planning Authority and identified as unnecessary in the written report, an appraisal of remediation options and proposal of the preferred option(s) identified as appropriate for the type of contamination found on that phase or sub-phase. and (unless otherwise first agreed in writing by the Local Planning Authority)

(c) Testing for common contaminants during validation of site won material used for topsoil. Sampling to be undertaken at a rate of one sample per 250m3. Any material imported to the site should also be tested for contaminants at a rate of one sample per 100m3;

*Testing is particularly relevant in the areas of made ground eg Area C- the Contractors compound.*

(c). Use of a 'competent person' as a watching brief during development to identify
unsuspecting contamination;

(d) a detailed remediation scheme designed to bring that phase or sub-phase to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment. The scheme should include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works, site management procedures and a verification plan outlining details of the data to be collected in order to demonstrate the completion of the remediation works and any arrangements for the continued monitoring of identified pollutant linkages.

The above reports should be completed by a competent person, as stipulated in the National Planning Policy Framework, Annex 2, and site works should be undertaken in accordance with DEFRA and the Environment Agency’s ‘Model Procedures for the Management of Land Contamination, CLR 11’ and BS10175:2011 Investigation of potentially contaminated sites – Code of practice.

Reason - The site lies within the groundwater Source Protection Zone 1 for the Havant and Bedhampton Springs and to ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, drinking water supplies, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policies CP26 & CP27 of the Joint Core Strategy 2014 and paragraphs 109 and 121 of the NPPF.

It is considered necessary for this to be a pre-commencement condition as these details need to be agreed prior to the construction of the development and thus go to the heart of the planning permission.

19. Prior to the commencement of any phase or sub-phase of development, a remediation strategy to deal with the risks associated with contamination of the that phase or sub-phase shall be submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:
   - all previous uses
   - potential contaminants associated with those uses
   - a conceptual model of the site indicating sources, pathways and receptors
   - potentially unacceptable risks arising from contamination at the phase or sub-phase

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the
remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the Local Planning Authority.

The scheme for each phase or sub-phase shall be implemented as approved.

Reason - To ensure that the development does not contribute to, or is not put at unacceptable risk from/adversely affected by, unacceptable levels of water pollution in line with paragraph 170 of the NPPF.

It is considered necessary for this to be a pre-commencement condition as these details need to be agreed prior to the construction of the development and thus go to the heart of the planning permission.

20. Prior to the commencement of development, or development in any phase or sub-phase, where site won material is to be utilised, it shall be demonstrated to the satisfaction of the Local Planning Authority through the submission and approval of a verification report that the material to be used as topsoil is suitable for its intended use. Validation testing for common contaminants at a rate of one sample per 250m3 for site won material.

Reason - To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite.

It is considered necessary for this to be a pre-commencement condition as these details need to be agreed prior to the construction of the development and thus go to the heart of the planning permission.

21. No drainage shall be infiltrated to ground within a 10m stand-off zone surrounding any known solution feature with a surface expression (e.g. surface depression or sinkhole) or where solution features (without surface expression) are encountered during the works. In addition, building structures and infrastructure positions will also be located, where possible, to avoid such solution features, subject to detailed investigation, assessment and development of appropriate mitigation measures. A development design strategy for mitigating the hazards of solution features on buildings and infrastructure shall be prepared and approved in writing by the local planning authority prior to the commencement of development or any phase or sub-phase of development. The development shall be carried out in accordance with the approved details.

Reason - Paragraph 178 of the National Planning Policy Framework paragraph states that
planning policies and decisions should also ensure that the site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation.

Solution features can create zones of instability that provide a direct connection to the aquifer. Such features in this area have been shown to provide rapid transmission pathways for pollutants direct to the springs at Havant & Bedhampton. As a result, a precautionary approach to development is needed to protect this important public drinking water supply.

To ensure that any proposed drainage works, do not harm water resources in accordance with Policy CP26 of the East Hampshire Core Strategy and paragraph 170 of the NPPF. It is considered necessary for this to be a pre-commencement condition as these details need to be agreed prior to the construction of the development and thus go to the heart of the planning permission.

22. Each dwelling shall comply with the Building Regulations Optional requirement of a maximum water use of 110 litres per person per day.

**Reason** - In the interests of preserving water quality and resources and to protect biodiversity in accordance with the Conservation of Habitats & Species Regulations 2017

23. Before any phase of the development is occupied or used a verification report demonstrating the effectiveness of the remediation works undertaken, a completion certificate provided by the agreed competent person, confirming the approved remediation scheme has been implemented in full, shall be submitted to and approved in writing, by the local planning authority in consultation with the Environment Agency and Portsmouth Water.

The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

The verification report and completion certificate shall be submitted in accordance with the approved scheme and undertaken by a competent person in accordance with DEFRA and the Environment Agency’s ‘Model Procedures for the Management of Land Contamination, CLR 11

**Reason** - To confirm that remediation has been carried out in accordance with the remedial strategy. To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, drinking water supplies, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policies CP26 & CP27 of the Joint Core Strategy 2014 and paragraphs 109 and 121 of the NPPF.

24. If, during development, or a phase or sub-phase of development, contamination not
previously identified is found to be present at the site then the local planning authority must be notified immediately.

No further development (unless otherwise agreed in writing with the local planning authority) shall be undertaken in that phase or sub-phase until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved before development in that phase or sub-phase recommences.

**Reason** - To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to Controlled Waters, drinking water supplies, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

To ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of pollution from previously unidentified contamination sources at the development site in accordance with Policies CP26 and CP27 of the Joint Core Strategy and paragraph 170 of the NPPF.

25. No piling or any other foundation construction using penetrative methods shall be carried out other than with the express written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

If such construction methods are proposed to be used, details shall first be submitted to, and approved in writing, by the Local Planning Authority, prior to the commencement of development or any agreed phase or sub-phase of development. The development shall be carried out in accordance with the approved details.

Note: If piling or other penetrative measures were to be approved in lower risk areas of the site a detailed method statement must be submitted to, and agreed in writing by the Local Planning Authority before such works commence. The method statement should detail the equipment, methodology, grout, control measures and monitoring that will be implemented to ensure there is no increased risk to controlled waters or drinking water supplies.

**Reason** - The site lies within the groundwater Source Protection Zone 1 for the Havant and Bedhampton Springs, a public drinking water supply. Solution features and karstic fissures connected to the Havant & Bedhampton Springs are known to be present in this area which increases the risk of pollutants entering groundwater rapidly without attenuation and to ensure that any proposed piling or deep foundation using penetrative methods, does not harm groundwater resources in line with Policy CP26 of the East Hampshire Core Strategy, paragraph 170 of the NPPF, and the Environment Agency’s position statement 'N8 - Physical disturbance of aquifers in a SPZ1' set out in the document 'The Environment Agency’s approach to groundwater protection' (https://www.gov.uk/government/publications/groundwater-protection-position-statements).

Piling or any other foundation construction methods using penetrative methods could allow
hazardous substances and non-hazardous pollutants to enter groundwater by for example, mobilising contamination and creating preferential pathways. Thus, it should be demonstrated that any proposed piling;

a. Will not result in contamination of groundwater.
b. Nor any increased risk to drinking water supplies (including turbidity).
c. Nor deterioration in the transmissivity of the aquifer.

26. Prior to the commencement of any phase or sub-phase of development full details of proposed below ground engineering works including land/solution feature stabilisation measures for that phase or sub-phase, shall be submitted to and approved in writing by the local planning authority. Those works shall be designed based upon a comprehensive assessment of the hydrological and hydrogeological context of the development, informed by detailed geophysical and ground investigations including the identification of the location of any solution feature that may act as a pathway for pollutants to reach groundwater. The works shall be designed and carried out in such a way as to ensure that they do not pose any potential risk to ground water quality, or drinking water supplies, by way of contamination or adverse effect on turbidity. The works shall be implemented in accordance with the approved details before the development, or development of that phase or sub-phase is occupied.

Details shall also be provided in any phase or sub-phase of the measures that will be employed to prevent trenches across permeable ground in high, very high and extreme vulnerability areas, creating a new pathway for water drainage into the aquifer. These details shall be submitted to and approved by the local planning authority. The works shall be fully implemented in accordance with the approved details before the development of that phase or sub-phase is occupied.

Reason - To ensure that any proposed below ground engineering works, including land/solution feature stabilisation measures, do not harm groundwater resources in line with Policy CP26 of the East Hampshire Core Strategy, paragraph 170 of the NPPF and paragraph 178 of the NPPF which states that planning policies and decisions should also ensure that the site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation.

Solution features can create zones of instability that provide a direct connection to the aquifer. Solution features in this area have been shown to provide rapid transmission pathways direct to the springs at Havant & Bedhampton. As a result, a precautionary approach to development is needed to protect the public water supply.

These measures are required to ensure that new utility and other trenches do not significantly change the permeability of the ground, which could create new pathways for drainage of water into the aquifer, this in turn would increase the pollution risk.

27. No underground storage facilities and/or distribution infrastructure for
hazardous substances (such as hydrocarbons) shall be constructed at the site. Underground storage facilities, pumping and/or distribution infrastructure for non-hazardous polluting substances (such as sewage) shall only be constructed at the site with appropriate engineering standards and controls, and having effective management standards in place, taking into account the location specific risks.

Should such storage facilities be required, details shall be submitted to and agreed in writing by the Local Planning Authority prior to the commencement of development or any agreed phase or sub-phase of development. Development shall be carried out in accordance with the approved details.


It is considered necessary for this to be a pre-commencement condition as these details need to be agreed prior to the construction of the development and thus go to the heart of the planning permission.

28. Prior to the commencement of development, or phase or sub-phase of development, details of the measures which will be undertaken to protect public sewers shall be submitted to and approved in writing by the local planning authority for that phase or sub-phase. The development or phase or sub-phase of development shall be carried out in accordance with the approved details.

Reason - To ensure proper protection of public sewers in the interests of public health and the protection of groundwater in accordance with Policy CP26 of the East Hampshire Core Strategy.

It is considered necessary for this to be a pre-commencement condition as these details need to be agreed prior to the construction of the development and thus go to the heart of the planning permission.

29. Prior to first occupation of any dwelling, new occupiers shall be issued with a leaflet providing advice on the responsible enjoyment of natural heritage assets ('Natural Heritage Information for Residents), the details of which shall have been first submitted to, and approved in writing by the Local Planning Authority.

Reason – In the interests of the sustainable enjoyment and protection of biodiversity within the site.

30. No development, or if a phasing plan has first been agreed in writing by the Local Planning Authority, no development of the individual phase, shall start on site until
until a scheme has been submitted to, and agreed in writing by, the Local Planning Authority to demonstrate that all multi-residential and non-residential development with a floor space of over 500 sq m will achieve a BREEAM rating of not less than 'excellent'.

Before any part of the non-residential development with a floor space of over 500 sq m is first occupied a verification report and completion certificate shall be submitted in writing to the Local Planning Authority confirming that the built development hereby permitted has been constructed in accordance with the approved scheme.

The developer shall nominate a competent person for the purpose of assessing and providing the above required report and certificate to confirm that the completed works incorporate such measures as to provide the required energy savings.

The energy saving works set out in the above report shall thereafter be maintained so that the required energy saving is sustained at the certified level for the lifetime of the development.

**Reason** - To ensure that the development incorporates necessary mitigation and adaptation measures with regard to climate change. It is considered necessary for this to be a pre-commencement condition as these details relate to the construction of the development and thus go to the heart of the planning permission

31. Prior to the occupation of the 100th dwelling details of a bus strategy, which shall include the provision to operate a bus service which serves the site between 0630 and 1900 on Monday to Saturdays, for the site shall be submitted to and agreed in writing by the local planning authority. The details of the bus strategy shall include frequency details, hours of operation and routing. The 100th dwelling shall not be occupied other than in accordance with the approved Bus Strategy.

**Reason** – To ensure sustainable patterns of travel are promoted in accordance with Policy CP31 of the East Hampshire Core Strategy and paragraphs 102, 108 and 111 of the NPPF, 2019.

32. No access from Rowlands Castle shall be provided other than for use by public transport, pedestrians, cyclists, emergency vehicles, or for access to/from the allotments? to be provided.

**Reason** – In the interests of highway and pedestrian safety.

33. Prior to the submission of the first reserved matters application, a Design Code document for the development shall be submitted to, and approved in writing by, the Local Planning Authority. The Design Code document shall include the following details;

(a) Principles for the built form of key character areas within the Site to be informed by local character, having particular regard to:

   (i) building form and depth,
(ii) roofscape, including ridge lines and pitches,
(iii) building heights (in accordance with the parameters plan),
(iv) building elements such as chimneys, eaves, openings (windows / doors) and porches,
(v) external materials,
(vi) boundary treatment, and
(vii) Parking principles (including cycle parking / storage).

(b) Principles for the detailed design of vehicular accesses from Havant Road and Rowlands Castle Road including landscaping, materials and surfacing and incorporating the principles within Manual for Streets.

(c) Principles for hard and soft landscaping

Development shall be carried out in accordance with the approved Design Code document, unless otherwise agreed in writing by the Local Planning Authority.

Reason - To ensure a satisfactory design for the development, in the interests of the character and appearance of the area

Informatives

1. All development shall be stopped immediately in the event that contamination not previously identified is found to be present on the development site and details of the contamination shall be reported immediately in writing to the Local Planning Authority. To help ensure developers submit information to the standard expected by this Authority, Environmental Health has put together a leaflet entitled "Development on Potentially Contaminated Land", available as a download on the following East Hampshire District Council website:


At the back of this document is a template for a Completion Certificate which can be used to document all site investigation work undertaken on site. A certificate of this nature is required to be submitted to the LPA before discharge of the final contaminated land condition.

2. The developer is advised that any proposal to deliver a biodiversity net gain through enhancement measures providing bird and bat boxes in The Holt and Havant Thicket woodland could potentially conflict with the strategy Portsmouth Water have already discussed with the Forestry Commission of placing bird and bat boxes in Havant Thicket in relation to the reservoir project strategy. It is advised that the developer's advisors take a collaborative approach and work with Portsmouth Water, Forestry Commission, Natural England and the LPA Ecologist to agree a robust strategy for such enhancements, which does not conflict with the reservoir project strategy.

3. The developer is made aware that there must be no surface alterations to the right of way, nor should any work be carried out which affect its surface, without the prior permission of
Hampshire Countryside Service as Highway Authority. To carry out any such works without this permission would constitute an offence under s131 Highways Act 1980. In relation to this application a Highway Agreement with the Countryside Service would be required prior to commencement of development or vegetation clearance or works which might affect the surface of the Right of Way. The grant of planning permission is separate from any consents that may be required in relation to access and rights of way and that nothing should be done to stop up or divert the public right of way without following the due legal process Hampshire Countryside Service are currently unlikely to support an application to divert Footpath 54.

4. The developer is made aware that Portsmouth Water has requested that details of proposed groundwater monitoring be provided at the detailed reserved matters stage.

5. The developer is made aware that Southern Water has advised that discussions take place regarding the alignment of the construction and occupation of the development with the delivery by Southern Water of any sewerage network reinforcement required to ensure that adequate waste water network capacity is available to adequately drain the development.

6. The developer is advised to contact the South Downs National Park Authority Dark Night Skies Ranger before the detailed design stage to discuss appropriate glazing and lighting for the development.

7. Bats and their roosts are protected under the Conservation of Habitats and Species Regulations 2010 and birds’ nests, when occupied or being built, receive legal protection under the Wildlife and Countryside Act 1981 (as amended). All work must stop immediately if evidence of bat or nesting bird presence (e.g. droppings, bat carcasses or insect remains, recent nesting materials), are encountered at any point during building demolition. Should this occur, further advice should be sought from Natural England and/or a professional ecologist.

8. The development subject to this notice falls within a highlighted proximity of a mains gas pipe which is considered a major hazard.

The applicant/agent/developer is strongly advised to contact the pipeline operator PRIOR to ANY works being undertaken pursuant to the permission granted/confirmed by this notice. Address is:
Southern Gas Networks Plc
SGN Plant Location Team
95 Kilbirnie Street
Glasgow
G5 8JD
Tel: 01414 184093 OR 0845 0703497
Search online at:
www.linesearchbeforeyoudig.co.uk
SGN personnel will contact you accordingly.

(October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government’s desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link:

http://www.sportengland.org/activedesign

10. The developer is made aware that the proposed development site is located in a very sensitive area with regards to groundwater protection and our drinking water resources. It is in a Source Protection Zone One (SPZ1) and prone to solution features resulting in the potential for rapid movement of pollutants through the catchment. The site is also located in close proximity to the safeguarded site for provision of a new winter storage reservoir.

11. The submitted plans do not grant permission for removal of hedging along Havant Road, other than to secure sightlines. All other removal of hedging is subject to Reserved Matter approval of landscaping.

12. The applicant is advised that the development the subject of this outline consent is liable to the East Hampshire District CIL Charging Schedule which became a material planning consideration on 8th April 2016. On approval of the last reserved matter arising from this outline consent, this development will be liable to pay the Council’s CIL upon commencement of development. For further information, please see the CIL pages online, here:

http://www.easthants.gov.uk/planning-policy/developers-contributions

13. The developer is made aware that this permission is subject to a Planning Obligation made under Section 106 of the Town and Country Planning Act 1990.

14. In accordance with paragraphs 38 and 39 of the NPPF East Hampshire District Council (EHDC) takes a positive and proactive approach and works with applicants/agents on development proposals in a manner focused on solutions by:

- offering a pre-application advice service;
- updating applicant/agents of any issues that may arise in the processing of their application and where possible suggesting solutions.

In this instance:

- The applicant was provided with pre-application advice;
- the applicant was updated of any issues and given the opportunity to address those issues raised,
Full Consultee Responses

55562/005 - Development Land East of Horndean

Atkins Ltd on behalf of Southern Water

11/1/19

Please find below, in addition to our consultation response, an information request that we have recently prepared. Southern Water requests that this is populated by the developer and returned to us. This information will be treated as business confidential and will assist Southern Water in understanding the level of infrastructure that may be required to service development over the build period of this development.

Please provide the following information:

- Proposed start date / /
- Proposed connection date / /
- First occupation date / /
- Forecast completion date / /
- Proposed date of full occupancy / /

Please return this letter with the requested information to: Southern Water, Developer Services, Sparrowgrove House, Sparrowgrove, Otterbourne, Hampshire SO21 2SW.

This is for Southern Water's use only. All information provided will be treated as private and confidential and will remain for internal use only.

To discuss this request further with Southern Water, Tel: 0330 303 0119.

Please find attached a plan of the sewer records showing the approximate position of a public foul sewer within the contour of the proposed highway/access road works.

The impact of any works within highway/access road on public apparatus shall be assessed and approved, in consultation with Southern Water, under NRSWA enquiry in order to protect public apparatus. Furthermore, due to changes in legislation that came into force on 1st October 2011 regarding the future ownership of sewers, it is possible that a sewer now deemed to be public could be crossing the above property.

Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its condition, the number of properties served, and potential means of access before any further works commence on site. The applicant is advised to discuss the matter further with Southern Water, Sparrowgrove House, Sparrowgrove, Otterbourne, Hampshire SO21 2SW (Tel: 0330 303 0119) or www.southernwater.co.uk”.

Southern Water has undertaken a desk study of the impact that the additional foul sewerage flows from the proposed development will have on the existing public sewer network. This initial study indicates that there is an increased risk of flooding unless any required network reinforcement is provided by Southern Water. Any such network reinforcement will be part funded through the New Infrastructure Charge with the remainder funded through Southern Water’s Capital Works programme.

Southern Water and the Developer will need to work together in order to review if the delivery of our network reinforcement aligns with the proposed occupation of the development, as it will take time to design and deliver any such reinforcement. Southern Water hence requests the following condition to be applied:

“Occupation of the development is to be phased and implemented to align with the delivery by Southern Water of any sewerage network reinforcement required to ensure that adequate waste water network capacity is available to adequately drain the development”

It may be possible for some initial dwellings to connect pending network reinforcement.

Southern Water will review and advise on this following consideration of the development program and the extent of network reinforcement required. Southern Water will carry out detailed network modelling as part of this review which may require existing flows to be monitored. This will enable us to establish the extent of works required (If any) and to design such works in the most economic manner to satisfy the needs of existing and future customers.

Our assessment of the timescales needed to deliver network reinforcement will consider an allowance for the following:

- Initial feasibility, detail modelling and preliminary estimates
- Flow monitoring (If required)
- Detail design, including land negotiations

Construction

The overall time required depends on the complexity of any scheme needed to provide network reinforcement. Southern Water will seek however to limit the timescales to a maximum of 24 months from a firm commitment by the developer to commence construction on site and provided that planning approval has been granted.

The application details for this development indicate that the proposed means of surface water drainage for the site is via a watercourse. The Council’s technical staff and the relevant authority for land drainage consent should comment on the adequacy of the proposals to discharge surface water to the local watercourse.
The planning application form makes reference to drainage using Sustainable Urban Drainage Systems (SUDS). Under current legislation and guidance SUDS rely upon facilities which are not adoptable by sewerage undertakers. Therefore, the applicant will need to ensure that arrangements exist for the long-term maintenance of the SUDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity.

Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system. Thus, where a SUDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SUDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development. This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

Land uses such as general hardstanding that may be subject to oil/petrol spillages should be drained by means of oil trap gullies or petrol/oil interceptors.

The proposed development would lie within or in very close proximity to a Source Protection Zone. Southern Water will rely on your consultations with the Environment Agency to ensure the protection of the public water supply source.

No soakaways, swales, ponds, watercourses, attenuation tanks or any other surface water retaining or conveying features should be located within 5 metres of a public or adoptable gravity sewers or rising mains.

If the applicant proposes to offer a new on-site drainage and pumping station for adoption as part of the foul/surface water public sewerage system, this would have to be designed and constructed to the specification of Southern Water Services Ltd.

A secure compound would be required, to which access for large vehicles would need to be possible at all times. The compound will be required to be 100 square metres in area, or of some such approved lesser area as would provide an operationally satisfactory layout. In order to protect the amenity of prospective residents, no habitable rooms shall be located closer than 15 metres to the boundary of the proposed adoptable pumping station, due to the potential odour, vibration and noise generated by all types of pumping stations.
We request that should this application receive planning approval, the following condition is attached to the consent: “Construction of the development shall not commence until details of the proposed means of foul and surface water sewerage disposal have been submitted to, and approved in writing by, the Local Planning Authority in consultation with Southern Water.” The design of drainage should ensure that no land drainage or ground water is to enter public sewers network.

This initial assessment does not prejudice any future assessment or commit to any adoption agreements under Section 104 of the Water Industry Act 1991. Please note that non-compliance with Sewers for Adoption standards will preclude future adoption of the foul and surface water sewerage network on site.

The applicant should be advised that a wastewater grease trap should be provided on the kitchen waste pipe or drain installed and maintained by the owner or operator of the premises.

23/8/19

Southern Water would have no further comments to make with regards to the amendment details submitted. The comments in our response dated 10/01/2019 remain unchanged and valid for the amended details.

25/3/20

Thank you for your letter dated 04/03/2020.

Should planning approval be granted then Southern Water recognises its obligations under the new charging regime to provide capacity in the existing sewerage system to accommodate the needs of the proposed development. Any such network reinforcement will be part funded through the New Infrastructure Charge with the remainder funded through Southern Water’s Capital Works programme.

Southern Water and the Developer will need to work together in order to review if the delivery of our network reinforcement aligns with the proposed occupation of the development, as it will take time to design and deliver any such reinforcement.

It may be possible for some initial dwellings to connect, pending network reinforcement. Southern Water will review and advise on this following consideration of the development program and the extent of network reinforcement required. Southern Water will carry out detailed network modelling as part of this review which may require existing flows to be monitored. This will enable us to establish the extent of works required (if any) and to design such works in the most economic manner to satisfy the needs of existing and future customers.

Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX southernwater.co.uk
Our assessment of the timescales needed to deliver network reinforcement will consider an allowance for the following:

- Initial feasibility, detail modelling and preliminary estimates.
- Flow monitoring (If required)
- Detail design, including land negotiations.
- Construction.

The overall time required depends on the complexity of any scheme needed to provide network reinforcement. Southern Water will seek however to limit the timescales to a maximum of 24 months from a firm commitment by the developer to commence construction on site and provided that outline planning approval has been granted.

All other comments in our response dated 26/05/2011 remain unchanged and valid for the amended details.

For any queries please contact us at developerservices@southernwater.co.uk

**Arboricultural Officer - EHDC**

11/1/19

There are a number of Tree Preservation Orders in force across the whole of this site, affecting individual trees, groups, areas and woodlands considered to be of significant amenity value in the landscape. These identified features represent a material consideration and constraint to development which must be appropriately considered in the proposals going forward. Saved Policy C6 of the EHDC Local Plan 2nd Review will apply having regard also to its conformity with the NPPF 2018.

I note the comments on the submitted Arboricultural Impact Assessment and Tree Report referenced BLO21984ar revision dated 29th November 2018 and in particular Chapter 7, further details in line with these comments in the form of Arboricultural Impact Assessment and scaled Tree Removal/Retention Plan linked to a proposed layout and a detailed Arboricultural Method Statement are required, with particular reference to retention in all aspects of the scheme of trees and other significant landscape features. Service routes will be required and must be outside the root protection areas of trees to be retained.

20/8/19

Please see my previous comments .... ending further details in line with these comments in the form of Arboricultural Impact Assessment and scaled Tree Removal/Retention Plan linked to a proposed layout and a detailed Arboricultural Method Statement are required, with particular reference to retention in all aspects of the scheme of trees and other significant landscape features. Service routes will be required and must be outside the root protection areas of trees to be retained.
Building Control – EHDC

No comments.

Chichester District Council

14/12/18, 20/9/19, 11/3/20

Thank you for consulting Chichester District Council on the above planning application. I can confirm we have no comments to make on the application as the site is approximately 2 miles from the District boundary.

Community Team - EHDC

11/1/19

Thank you for the opportunity to comment on the above application. Please see below comments from the EHDC Community Team for your consideration.

Sport pitch provision

The playing pitch would need to be supported by ancillary facilities in the form of changing rooms. The Community Building could provide these facilities, if it does not this function would need to be provided through other means.

Layout of the local centre

We have concerns regarding the configuration of the local centre area in particular regarding the most suitable location for the playing pitches, especially if there is potential for either additional pitches or an artificial pitch.

It will be important to consider how the playing pitches will interact with both the Community Building and school building, especially if the school facilities are opened for community use.

Community Building

We would strongly advise that the Community Building is a multi-functional building with adaptable, flexible space that would attract high yielding activities to ensure financial sustainability of the building into the future. We would be keen to be consulted on the proposed floorplan once this is produced.

The Community Building will need to provide changing room facilities to support the play pitches, so thought needs to be given as to how these different facilities will interact with each other.
**Allotments**

A communal building would need to be provided to enable storage for allotment users, with plots individually fenced off.

**Play areas**

We would want to see age appropriate play equipment provided on the site for the local and future demographic of the area.

**Traffic**

We would want travel plans in place for the school, employment and retail areas to ensure that traffic is managed in an appropriate manner and does not negatively impact on the wider highway network.

**Cycle routes to key destinations**

It is strongly recommended that the site is integrated into the wider cycle and rights of way network, by the developer providing a key route through the site. Links are needed to Dell Piece West, Dell Piece East, Havant Road and Bridleway 24. There is also a need for links to Rowlands Castle, and in particular linking to the station, the proposed Havant Thicket which will create recreational opportunities, South Downs College and local employment centres. It is recommended that the development site incorporates active travel design and through routes for active travellers so that movement around the site enables sustainable options.

**Safe routes to schools**

We are keen to see walking and cycling routes to the local schools. Improvements to enable this are required across the A3 (M) junction 2 to then link to Dell Piece West and onto the local schools including Horndean Technology College and Horndean Infant and Junior Schools.

The layout and drop off area of the proposed new school on the site would also need to encourage sustainable travel and provide suitable bike and scooter storage in order to reduce the use of the private car.

**Green Infrastructure**

We are in support of open space on the site and would want to see formal and informal open space provided as part of the development site, as this would provide amenity and recreational benefits and opportunities to improve health & wellbeing. Please do not hesitate to get in touch if further clarity is needed on any of the above points.
Conservation Officer - EHDC

15/10/19

Objection

For the purposes of describing the site three parcels of land have been identified as separate parts of the development. These are

- Land North of Rowlands Castle Road
- Land North-east of Havant Road; and
- Land South-West of Havant Road.

I have outlined my comments regarding policy context and the impact on heritage assets below under the heading for each site:

Legislative and Policy Background

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires planning authorities, when considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires planning authorities, when considering whether to grant planning permission for development which affects a Conservation Area, to have special regard to the desirability of preserving or enhancing the character and appearance of that area.

The need for the decision taker to attach considerable or special weight to the desirability of preserving the setting of listed buildings has been reinforced through two recent high court decisions of: Barnwell Manor Wind Energy Limited vs. East Northamptonshire District Council et al (2014); and North Norfolk District Council vs. DCLG and Mack (2014).

The above statute and its subsequent and consistent interpretation in recent high court decision emphasises the need for the policies of the NPPF to be implemented whilst always having regard to the need to give special or greater weight to the preservation of the setting of a listed building.

The National Planning Policy Framework (NPPF) sets out the policies that the Council must take into account when determining planning applications. The ‘Historic Environment Good Practice Advice in Planning Note 2’, states at paragraph 4:
‘The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest’ and provides at paragraphs 8, 9 and 10 that in order for the Local Planning Authority to make decisions in line with legal requirements, the objectives of the development plan; and, the policy requirements of the NPPF, great importance is placed on understanding the nature, extent and level of the significance of the heritage asset.

The revised NPPF sets out in Chapter 16, the core principles relating to development affecting Heritage Assets that local planning authorities should consider in making planning decisions in the following paragraphs:

‘184. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

189. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

190. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.

191. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

192. In determining applications, local planning authorities should take account of:

a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness.
Considering potential impacts

193. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be).

This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional

Local Plan Policies

Policy CP29 of the Joint Core Strategy states that proposals should harmonise with the townscape and the general character of the town or village in which it is set and that it easily assimilates into the landscape or is well related to a group of buildings.

Policy CP30 of the Joint Core Strategy states that development proposals must conserve and, where possible, enhance the District’s historic environment. This includes point c) which seeks to:

‘Conserve, enhance, maintain and manage the district’s heritage assets and their setting including listed buildings, conservation areas, Scheduled Ancient Monuments, archaeological sites and Historic Parks and Gardens.’

Saved Policy HE12 states clear that development which harms the setting of a listed building will not be permitted.

Land North of Rowlands Castle Road

The site is set some distance from the Horndean and Blendworth Conservation Areas and listed buildings with the nearest being Pyle Farm. In terms of these designated heritage assets it is not considered that this proposal will have an adverse impact. This site cannot be easily viewed from any of these sites and as such will not impact on their setting. I would even suggest that this land could be utilised in a manner that could reduce the impact the sites below have on heritage assets. For example, I would consider that this section of land could take further housing numbers diverting the developments away from the heritage assets affected.
Land North-east of Havant Road & Land South West of the Havant Road

The land North-east of Havant Road is set immediately adjacent to Pyle Farm which is an historic farmstead that contains a number of Grade II listed buildings including the Farmhouse, gardens and granary and a barn. The Farm currently enjoys a pleasant rural setting with views stretching across fieldscapes. As stated in the

Cultural Heritage Statement the significance of Pyle Farm lies in ‘its evidential value as a physical document of past agricultural practices and rural settlement’. This allows the observer to properly appreciate the functional origins of the complex and its relationship with the surrounding agricultural land. The Farm is also remains a prominent and focal feature in this landscape.

The land South-West of Havant Road is set immediately adjacent to Hook Cottage which is a Grade II listed 18th century country house. The property is of architectural merit and sits within attractive garden ground that leads to the south and west. I agree with the Cultural Heritage Statement that states:

‘Elements of the cottages settings, its gardens and fieldscapes which survive beyond this, contribute to the significance of Hook Cottage by placing it within a rural context similar to that in which it was constructed.’

The small subdivided paddocks in particular form the setting of these buildings and contribute towards a strong rural landscape character. That setting is somewhat rare in terms of the survival of historic field boundaries and small field sizes, in contrast to the wide open fields one tends to see in this area. The setting of the house is a key part of its historic significance, due to a common use and intrinsic co-existence, both in visual and functional terms.

I agree with the summary that the buildings to the north of Hook Cottager have partly eroded the rural character; however, the development will be set to the south and west where the setting is largely unchanged.

The setting of a heritage asset is defined in the glossary to the Framework as the surroundings in which a heritage asset is experienced. In simple terms, setting embraces all of the surroundings from which the heritage asset can be experienced, or that can be experienced from, or with, the asset. The development proposed would be clearly visible from the listed buildings and there would be areas within, and outside, the site where the listed buildings and the proposed development would be seen in juxtaposition. On that basis, it is clear that the proposal would have an impact on the settings of the listed buildings concerned.

The setting of both Pyle Farm and Hook Cottage contributes to their significance by placing it in a rural context similar to that in which it was constructed and operated. Changing the hinterland of the listed buildings from agricultural fields and hedgerows, to a housing estate, would reduce the ability of the observer to appreciate the origins of the complex, and its relationship with the land. This would have a harmful impact on the setting of the listed buildings.
On the basis of the information submitted, the application in its current form would impact negatively on the strong visual and spatial relationship between Pyle Farm/Hook Cottage and the surrounding landscape. Introducing a development, particularly one of this scale in such landscape and in such proximity to Grade II listed buildings is fundamentally at odds with its rural environment. For these reasons, the proposal in its current form will be harmful to the significance of these designated and locally prominent Grade II listed buildings through the impact on their setting.

In accordance with the NPPF I believe the degree of harm to this listed building would be significant, but on balance, less than substantial. In this context, the NPPF requires such harm to be weighed against the public benefits of the proposal.

24/3/20

My previous comments on this application still stand.

**Crime Prevention Officer**

9/1/19

Thank you for your letter of the 14th December 2018 and the opportunity to comment upon the application. Having considered the application I have the following comments to make with reference to crime prevention.

The proposed allotments are located to the north of the development adjacent to the Rowlands Castle Road, footpaths are shown nearby. In the proposed position there is very little natural surveillance of the allotments, which makes them very vulnerable to crime. Planning guidance advises that, “Planning should promote appropriate security measures”, it continues, “Taking proportionate security measures should be a central consideration to the planning and delivery of new developments and substantive retrofits.” To reduce the vulnerability of the allotments to crime they should be moved to a position with far greater natural surveillance from the overlooking dwellings. The allotments should be enclosed by a robust boundary treatment at least 2.1m high, the boundary treatment should be visually permeable.

A village centre, consisting of retail units, a community centre and a 2FE primary school is shown at the entrance to the western side of the development. Each of these facilities has the ability to general large volumes of vehicle traffic. With these facilities close together it is important that sufficient off street parking is provided to keep the public highway clear and maintain the flow of traffic. The positioning of each of the facilities does not easily allow for the use of the various associated car parks at peak times by other users.

An emergency access is shown into the development from the Rowlands Castle Road, suitable barriers should be put in place to ensure that this access cannot be used inappropriately.
The proposal creates a number of footpaths providing connectivity about the development, planning guidance advises, “Development should promote public spaces and routes that are attractive, accessible, safe, uncluttered and work effectively for all users etc.” To provide for the safety of those using these footpaths they should be wide, straight where possible any planting close to the footpaths should not obscure natural surveillance along the footpaths, nor provide a place where persons might lie-in-wait. In addition some consideration should be given as to how traffic calming measures can be incorporated into these footpaths to prevent them being used by motorcyclists.

Two types of public rights of way appear to cross the development Bridleways 502 and 24b and footpath 54. It is not clear from the documentation whether these rights of way are to be incorporated into the proposed connectivity or whether they are to be entirely separate. I would remind you that these public rights of way have a legal status which provides for the type of use. To provide for the public safety appropriate signage should be provided.

To provide for the safety and security of residents and visitors lighting throughout the development should conform to the relevant sections of BS 5489:2013.

**Drainage - EHDC**

20/12/18

The applicant has now submitted a Ground Investigation Report, dated November 2018. This indicates variable ground conditions across the site, which will require a variety of SUDS features to ensure there is no net increase in run-off. The site is located within a groundwater source protection zone SPZ 1.

Any subsequent full planning application will require a detailed flood risk assessment to show that surface water run-off will be controlled on site and not increase flood risk elsewhere. The various drainage systems will need to cater for the 1 in 100 year + 40% climate change event. Due to the high importance of the underlying aquifer, the Environment Agency and Portsmouth Water will almost certainly require additional protection measures to limit potential pollution.

Discussions should take place prior to submitting any drainage strategy or detailed design.

Proposals for foul drainage appear to be satisfactory, subject to detailed design.

No objections in principle subject to satisfactory drainage systems for both foul and surface water, together with agreement from EA and Portsmouth Water.
15/8/19

The applicant has now submitted an updated FRA and Drainage Strategy dated 22 July 2019. This is satisfactory in principle, subject to further site investigation and infiltration testing. A variety of SUDS features will be incorporated into the design to ensure there is no net increase in run-off, post development. The SUDS techniques used must take account of the fact that the site is located within a groundwater source protection zone SPZ 1.

Run-off must be attenuated on site and not increase flood risk elsewhere. The various drainage systems will need to cater for the 1 in 100 year + 40% climate change event. Due to the high importance of the underlying aquifer, the Environment Agency and Portsmouth Water may require additional protection measures to limit potential pollution.

Foul drainage will drain to an on-site pumping station, and discharge to the public foul sewer, subject to Southern Water approval.

No objections in principle subject to satisfactory drainage systems for both foul and surface water, together with agreement from EA and Portsmouth Water. These can be covered by DR02 and DR04, including detailed drainage layouts, run-off calculations for the peak event and site percolation tests to BRE 365. A plan is also required to show the flood flow routes for an exceedance event.

A detailed maintenance management plan will be required to cover all drainage features remaining private. An additional plan will be required to cover the construction phases.

5/3/20

I have now examined the additional details and have no further comments to make.

My earlier comments dated 15 August 2019 still apply.

Economic Development - EHDC

12/03/19

The application is for a maximum of 800 dwellings and up to 2ha of employment land in the northern parcel (B) and southern parcel (C). The application is broadly similar to application case no. 55562/001 previously approved on the same site and which continues to cover land parcel (A).

Economic Development Office acknowledges that the proposed employment land allocation comprising about 2ha of land for industrial use B2 and business use B1 on the site, are in line with the previously approved application ref. 55562/01 and the requirements of the East Hampshire District Local Plan: Housing and Employment Allocations – April 2016.
We also note that there has been a change to the proposed access to the employment area and this is no longer a shared access with residential. We welcome the change as this will help minimise any likely impact resulting from proximity to residential developments. (cf: Illustrative Master Plan - 55562_005-ILLUSTRATIVE_MASTERPLAN-825817 RG-M-27)

Economic Development Office would note as follows:

1. Phasing and Delivery 1.1. Whilst we do not object to the principle of the development, we object to the delivery of the proposed employment area in Phase 3 (final phase) of the development (ref: Design and Access Statement dated December 2018).

1.2. Seeking to deliver the employment area as the final phase of the development, means that business employment will be delivered after housing and other schemes and therefore, does not meet the immediate employment needs of Horndean to offset the population growth resulting from increase in dwellings. The proposal represents a mixed-use development and therefore, delivery of business use class jobs must be in parallel with the delivery of housing.

1.3. Economic Development Office therefore seeks that the employment area is delivered in Phase 1 of the proposed development and that delivery of the employment site and the proposed access is tied into the delivery of Phase 1 dwellings by way of occupational triggers through a S106 Agreement.

2 Local Employment and Training

The proposal involves an increase of 100 dwellings (on the approved application 55562/01) and therefore, the Local Employment and Training requirements for the site should be revised accordingly and a S106 Agreement completed to this effect.

Economic Development does recognise the need to provide housing; however, housing growth needs to be supported by jobs growth and employment in order to create a sustainable local economy. In order to achieve sustainable economic growth, East Hampshire has to tackle key issues and challenges such as jobs creation, skills, training and employment, alongside provision of housing. Given the scale of the development and the likely economic impact on the area, e.g. growth in population and jobs demand, Economic Development seeks that the applicant enters a S.106 Local Employment and Training Agreement/ Unilateral Undertaking to mitigate for skills shortages, increase apprenticeship opportunities and provide career opportunities for residents.

Mitigation measures include:

- An agreement to assist in the placement of apprentices and unemployed from the local area into jobs during the construction phase of the development.

- Negotiate obligations including; direct labour agreements, training, work experience/placements and apprenticeships to be implemented during the construction phase of the project and also following completion date (if required).
• In certain circumstances where the developer is unable to deliver local job opportunities through the Local Employment and Training Agreement, the developer can negotiate a financial contribution to enable the Council to generate alternative employment opportunities. The funds will be retained specifically for employment, skills, training and enterprise support through the Get East Hants Working Initiative.

The developer benefits by being able to draw on a local workforce for local development projects and also mitigate the economic impact of the development on the area.

Policy References: The East Hampshire District Local Plan Joint Core Strategy Policy CP5; NPPF Paras: 8, 80, 82 and 54.

23/10/19

Further to Economic Development Office’s comments dated 12 March 2019 and taking into account the Service’s comments and negotiations on the previously approved scheme on the subject site (planning reference: 55562/001), we would note as follows:

1. We reiterate that whilst we do not object to the principle of the development, we object to the delivery of the proposed employment area in Phase 3 (final phase) of the development (ref: Design and Access Statement dated December 2018). Seeking to deliver the employment area as the final phase of the development, means that business employment will be delivered after housing and other schemes and therefore, does not meet the immediate employment needs of Horndean to offset the population growth resulting from an increase in dwellings. The proposal represents a mixed-use development and therefore, delivery of business use class jobs must be in parallel with the delivery of housing.

2. To this effect, Economic Development Office sought (comments dated 12 March 2019) that the delivery of the employment area is undertaken in Phase 1 of the proposed development and that delivery of the employment site and the proposed access is tied into the delivery of Phase 1 dwellings by way of occupational triggers through a S106 Agreement. This is similar to what was negotiated and agreed for approved scheme (planning reference: 55562/001).

3. Following submission of Economic Development Office’s comments, we understand that the applicant has sought a change to the delivery timescale for the employment area from Phase 1 (as requested by Economic Development Office) and Phase 3 (applicant’s preference) to delivery in Phase 2. This request has been taken into consideration in preparation of this supplementary statement.

4. Apart from an increase in residential dwellings from 700 to 800, there does not seem to have been any significant changes to the approved scheme (planning reference 55562/001) so as to justify a change to the delivery of the employment area from that previously agreed. We have not been provided with any written justification and viability assessment to demonstrate why the employment area (B1/B2 floorspace) cannot be delivered in the Phase 1.
5. However, after careful consideration and in the absence of any viability assessment to justify a delay to the delivery of the employment area, we have split delivery into two i.e. new access and business use floorspace to facilitate early delivery. To this effect, we are now seeking delivery of the employment area as follows:

5.1. New access to the employment area to be delivered as part of the proposed works to the Havant Road/ Dell Piece East roundabout. This new access forms the fifth arm of the Havant Road/ Dell Piece East roundabout (see drawing reference: VD18678/100-05 General Arrangement) and the proposed works to this roundabout (including the fifth arm for the employment area) remains the same as previously approved (see Planning reference 55562/001 and the S106 Agreement dated 4th February 2016 – Schedule 3: Highways Part 2 and drawings A081737_023 and A081737_52).

5.2. Delivering the fifth arm of the Havant Road/ Dell Piece East roundabout to service the employment area is not unlike providing the third arm for Land parcel A, both of which are additions to the existing roundabout (see drawing reference: VD18678/100-05 General Arrangement). Also, carrying out the works to the whole roundabout at the same time will minimise impact on road users and the area as a whole. The applicant does not seem to have considered the likely significant impact on road users and disruption to the area resulting from having to deliver the fifth arm at a later date.

5.3. B1 and B2 employment floorspace (employment area) to be delivered in Phase 2 and tied into the delivery of the dwellings by way of occupational triggers through a S106 Agreement. We do recognise that this is a departure from what was previously agreed on the site i.e. delivery of the employment area in the Phase 1 of the mixed use development (planning reference 55562/001). The change from Phase 1 delivery to Phase 2 delivery, whilst not preferable and despite the absence of viability assessments, represents a reasonable compromise which allows for the planning process to progress.

Environment Agency

13/1/19

We have reviewed the information as submitted and set out our position and comments below.

Unfortunately, due to time and resource constraints, we have not been able to prepare a joint response with Portsmouth Water. However, we have developed our response below in liaison with Portsmouth Water, and are we in support of our respective positions.

Environment Agency Position

We request that the following conditions be attached to any planning permission granted, and that the details in relation to these conditions be submitted and approved by the Local Planning Authority.
Comment on the Site

Groundwater is extremely sensitive in this location because the proposed development site is within Source Protection Zone 1, with karstic features known to be present in the area which have very rapid transit to the public water supply abstractions (Havant and Bedhampton Springs). In light of this sensitivity, we would require the following conditions. Without these conditions, we would object to the development in accordance with paragraph 170 of the National Planning Policy Framework (NPPF).

**Condition 1 – Surface Water Disposal**

Prior to the development of any phase of development hereby approved commencing a scheme for surface water disposal for that phase shall be submitted to and approved by the Local Planning Authority in consultation with the Environment Agency and Portsmouth Water. Such a scheme should only use infiltration systems where it can be demonstrated that they will not pose a risk to groundwater quality or drinking water supplies. The scheme should include details of:

- Pollution prevention measures to be incorporated
- Inspection, maintenance and monitoring procedures and arrangements
- Details of relevant investigation into the location of solution features which may act as pathways for pollutants to reach groundwater rapidly
- Details of a robust discovery and assessment strategy, for previously undetected solution features
- Assessment into the connectivity between any solution features identified and the Havant and Bedhampton springs
- A risk assessment to demonstrate that the proposed strategy will not pose a risk to groundwater quality or drinking water supplies (including turbidity)

The scheme shall be implemented in accordance with a timetable agreed as part of the submitted and approved details.

**Reason for Condition 1**

To ensure that any proposed surface water drainage scheme does not harm groundwater resources in line with paragraph 170 of the NPPF.

**Condition 2 – Remediation Strategy**

Prior to each phase of development approved by this planning permission, no development shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:
• all previous uses
• potential contaminants associated with those uses
• a conceptual model of the site indicating sources, pathways and receptors
• potentially unacceptable risks arising from contamination at the site

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the written consent of the Local Planning Authority.

The scheme shall be implemented as approved.

Reason for Condition 2

To ensure that the development does not contribute to, or is not put at unacceptable risk from/adversely affected by, unacceptable levels of water pollution in line with paragraph 170 of the NPPF.

Condition 3 – Verification Report

Prior to each phase of development being occupied a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason for Condition 3

To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 170 of the NPPF.

Condition 4 – Unidentified Contamination
If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the Local Planning Authority.

The remediation strategy shall be implemented as approved.

Reason for Condition 4

To ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 170 of the NPPF.

**Condition 5 – Piling or Deep Foundation Works**

Piling or deep foundation using penetrative methods shall not be carried out other than with the written consent of the Local Planning Authority.

The development shall be carried out in accordance with the approved details.

Reason for Condition 5

To ensure that any proposed piling or deep foundation using penetrative methods, does not harm groundwater resources in line with paragraph 170 of the NPPF, and our position statement ‘N8 - Physical disturbance of aquifers in a SPZ1’ which is set out in the document ‘The Environment Agency’s approach to groundwater protection’ (https://www.gov.uk/government/publications/groundwater-protection-position-statements).

**Condition 6 – Below Ground Engineering Works**

No development shall take place, or if a phasing plan has first been agreed in writing by the Local Planning Authority, no development of the individual phase shall take place, until full details of any proposed below ground engineering works, including land/solution feature stabilisation measures, has been submitted to and approved in writing by the Local Planning Authority in consultation with the Environment Agency and Portsmouth Water.

Those works shall be designed based upon a comprehensive assessment of the hydrological and hydro-geological context of the development, informed by detailed geophysical and ground investigations, including the identification of the location of any solution feature that may act as a pathway for pollutants to reach groundwater. The works shall be designed and carried out in such a way as to ensure that they do not pose any potential risk to ground water quality, or drinking water supplies, by way of contamination or adverse effect on turbidity.
The works shall be implemented in accordance with the approved details before the development/development of that phase is occupied.

Reason for Condition 6

To ensure that any proposed below ground engineering works, including land/solution feature stabilisation measures, do not harm groundwater resources in line with paragraph 170 of the NPPF.

Condition 7 – Storage of Oils, Fuels or Chemicals

Details of any facilities for the storage of oils, fuels or chemicals associated with this development shall be submitted to and approved by the Local Planning Authority. The details shall include:

- Secondary containment that is impermeable to both the oil, fuel or chemical and water, with no opening used to drain the system.

- A minimum volume of secondary containment of at least equivalent to the capacity of the tank plus 10% and if there is more than one tank in the secondary containment the capacity of the containment should be at least the capacity of the largest tank plus 10% or 25% of the total tank capacity, whichever is greatest.

- All fill points, vents, gauges and sight gauge located within the secondary containment.

- Associated above ground pipework protected from accidental damage.

- All fill points and tank vent pipe outlets designed to discharge downwards into the bund.

The scheme shall be implemented as approved prior to any storage of oils, fuels or chemicals.

Reason for Condition 7

To ensure that the any storage, of oils, fuels or chemicals does not harm groundwater resources in line with paragraph 170 of the NPPF, and our Position Statement D1 ‘General principles of pollutant storage and transmission’ of as set out in the document ‘The Environment Agency’s approach to groundwater protection’ (https://www.gov.uk/government/publications/groundwater-protection-position-statements).

Condition 8 – Underground Storage Facilities, Pumping or Distribution Infrastructure
No underground storage facilities and/or distribution infrastructure for hazardous substances (such as hydrocarbons) shall be constructed at the site. Underground storage facilities, pumping and/or distribution infrastructure for non-hazardous polluting substances (such as sewage) shall only be constructed at the site with appropriate engineering standards and controls, and having effective management standards in place, taking into account the location specific risks.

Reason for Condition 8

To ensure that the any storage facilities, pumping or distribution infrastructure of non-hazardous polluting substances does not harm groundwater resources in line with paragraph 170 of the NPPF, and our Position Statement D2 ‘Underground storage (and associated pipework)’ as set out in the document ‘The Environment Agency’s approach to groundwater protection’ (https://www.gov.uk/government/publications/groundwater-protection-positionstatements).

Condition 9 – Foul Water

No phase of development shall commence until such time as a scheme to dispose of foul water for that phase has been submitted to, and approved in writing by, the Local Planning Authority in consultation with the Environment Agency, Portsmouth Water and Southern Water.

The scheme shall be implemented in accordance with the timetable agreed as part of the approved scheme.

The scheme shall also include:

• Details of how the scheme shall be maintained and managed after completion.

• Details of the sewage pipe work layout and specifications.

Reason for Condition 9

To ensure that any foul water drainage arrangements do not harm groundwater resources in line with paragraph 170 of the NPPF.

Advice to the Local Planning Authority and Applicant
We have reviewed the submitted reports and make the following observations:

Ground Conditions Assessment and Ground Investigations Assessment
With reference to the report ‘Ground conditions assessment and ground investigations assessment’ (Peter Brett Associates, dated November 2018, Ref 42208/3501 R001(GIR) Rev2), we have no fundamental issue with the contents in relation to land quality. However, we raise the following issues with regards to the details in the report:

• With regards to contamination, we would query the “very low” assessment of the risk for the site as a whole. While we could though support the “very low” assessment for many areas (i.e. agricultural greenfield), for some areas around the former farm, agricultural buildings and areas of made ground the risks would be somewhat higher. However, we would agree that these areas are unlikely to be associated with widespread gross contamination. In particular the area around the former farm/contractor compound would require further investigation. At this stage, we cannot see site walkover assessments for these areas – if they exist please provide this information.

It is not clear on the current status of the former farm area and if it is primarily covered by hardstanding, and this should be clarified by the Applicant. There is the potential for historic medium/small scale oil storage (i.e. above ground tanks etc). There is also the potential for soakaway associated with yard/working areas. Given that the former farm is located close to the edge of the Paleogene/Chalk boundary, it is possible the historic soakaway may be associated with solution features.

It is not clear from the site investigation that the farm area has yet been subject to targeted intrusive investigation. This should be investigated, at the earliest possible stage, as the evidence for past usage could be lost in the formation of a contractor compound.

We agree that for the areas that have been subject to intrusive investigation, they appear to be largely free from any significant contamination.

• We note that some elevated arsenic was encountered in association with a potential solution feature. We would not dispute the assessment that this is likely to be naturally occurring. The levels, though elevated, are also unlikely to cause significant issues. We also accept that areas associated with the solution feature are likely to have a lower pH (compared with surrounding chalk), and be subject to more mobility of naturally occurring minerals.

• We would also agree that the slightly elevated Benzo(a)pyrene in one of the made ground samples would not cause significant concerns, provided that there was not increased risk of mobilising into underlying solution features. However, we would highlight that trial pit/borehole logs do not appear to have been included in the submitted report. These would need to be provided in order to confirm the acceptability of any investigations.
• From the information provided, we would not envisage pursuing further characterisation work in most areas of the site. As per our comments above, the area around the former farm/contractors compound would require further intrusive investigation/characterisation.

• A careful watching brief for any evidence of contamination should be maintained during any intrusive works in all areas, but particularly areas of made ground and areas closest to the former landfillsexisting oil wells. This is particularly the case if any piling is proposed close to these areas. A method statement on how to ensure that piling in these areas does not pose a risk of mobilising contamination in underlying chalk is likely to be required. This should be included in any piling risk assessment (with reference to Condition 5).

• At the detailed design phase, we may also seek some chalk groundwater monitoring during the construction phase. This will help confirm that construction activities are not impacting on the Source Protection Zone and related public water supply abstraction. This may need to be incorporated into any final proposal associated with the site investigation conditions.

• We would in general support the proposal to remove/characterise the made ground and reuse the material, but only if no contamination was identified. However, made ground must not be used in areas where solution features or rapid drainage are likely (i.e. chalk or near the Paleogene boundary). As part of any “remediation” proposal, we would want to see a detailed method statement detailing any made ground, assessment/reuse proposal. This should take account of the specific high sensitivity of areas of the site. Any reuse should be carried out under the CL:AIRE Code of Practice.

• We welcome the 10 metre offset agreed for the area around the potential solution feature. However, we would question if the exact extent of the solution feature has been confirmed.

• While we would support the majority of the recommendation in the report, we do note that the potential use of borehole soakaway is discussed. As per earlier discussion/agreements with the Environment Agency and Portsmouth Water, the use of borehole soakaway will not be accepted at this site. We do note that no boreholes are proposed in the surface water drainage proposal in the Water Environment Statement. As such we have taken the assumption that boreholes will not be used in the final design. We would again reiterate that we would not accept any detailed drainage scheme containing borehole soakaways.

Flood Risk Assessment and Drainage Strategy Report
We have also reviewed the ‘Flood Risk Assessment and Drainage Strategy Report’ (Appendix K of the submitted Environmental Statement, Peter Brett Associates, 18th November 2018), in relation to surface water drainage proposals. In general, we would support the recommendations in this report.

In particular, we are pleased to see confirmation that the drainage Strategy Southern Catchment relies on attenuated surface water drainage, supplemented by limited shallow infiltration. In particular, we welcome that borehole soakaways are not proposed for this area now. As per our comment above, borehole soakaway would fundamentally not have been acceptable. The proposed drainage strategy may now also more closely mimic existing surface water drainage arrangements for this section of site.

We did also note that infiltration rates in the shallow chalk appear to be fairly rapid, compared to deeper chalk. While we would not have any specific issues with this, it does highlight that there may be more fracturing in the shallow chalk than in the deep chalk. These shallow areas may in turn feed into major fractures/solution features deeper in the chalk, and this are likely to be associated with rapid groundwater flow. If there is evidence that this is the case, than additional safeguards, or review of specific localised drainage arrangement may need to be sought. We would ask that the Applicants initiate discussions with the Local Planning Authority, us and Portsmouth Water if this process appears to be the case.

At the detailed design phase, we may require some additional assessment of specific infiltration features. In highest risk areas (such as those identified close the Paleogene/chalk boundary), we may seek that percolation/infiltration tests be carried out in infiltration features taking drainage potentially impacted by contaminants (i.e. non-roof water). This should be included in any detailed drainage strategy. If percolation rates are found to be excessively rapid, then this could indicate drainage connecting into solution features. In these circumstances, further assessment of specific safeguards may be required. As a minimum, it is likely to require inclusion of a mechanism to slow/further attenuate drainage. The details of this can be agreed at the detailed design phase.

We note that there will be additional safeguards to limit/prevent infiltration from site drainage infrastructure in the immediate area of the potential Paleochannel. We welcome this safeguard, as we would be of the opinion that the Paleochannel, may be associated with unidentified solution features.

In summary, in general we would support the general drainage arrangements and solution features assessments/zonation as outlined. We would need to review specific details at the detailed design phase(s).

With regards to any proposal to stabilising solution features, as per the Condition 6 above, we should be consulted in methods/details at the design phase.
We would also ask to be provided with a maintenance program for any oil interceptors, at any
detailed design phase.

We welcome the proposal for additional safeguards for the foul water pumping station.

We have no intrinsic opposition to the safeguards as outlined, but would respond in
full once the exact proposal, giving layout etc, are present in any detailed design
phase.

19/8/19

We have reviewed the information as submitted and set out our position and comments
below.

Our previous response to this outline application (dated 31 January 2019, our ref:
HA/2018/120971/01-L01) still remains valid. Further specific comments regarding the
additional information submitted are shown below:

Flood risk assessment and drainage strategy report

We have reviewed the revised ‘Flood Risk Assessment and Drainage Strategy Report, 22
July 2019, Abley Letchford Partnership Limited, A231-R002B.’

We can confirm that the broad approach to the drainage strategy is in line with previous
agreements with us and Portsmouth Water.

We welcome that this report confirms (paragraph 5.18) that deep borehole soakaway will not
be used. This was one of the key issues that we had raised concerns with during the initial
proposals.

We also note that the use of standard scoring assessments (from table 26.3 and 26.4 of
SUDs Manual) for the use of SUDS. While we would not have any particular issues with this,
it would need to be on a case by case basis. As the sensitivity of the site is exceptional, on
the higher risks aspects additional levels of safeguards may be required. We would anticipate
this would be in line with previous discussions concerning such safeguards (such as
protection/standoff/mitigation of karst features).

We note that paragraph 5.40 says as follows –

“wherein infiltration was considered feasible across the northern portion of the site between
Soakfield Row and Rowlands Castle Road; subject to further design refinement and
geological testing.”

We strongly recommend that the further refinement should include an agreed
standoff/mitigation from any suspect doline/sinkhole (i.e. surface karst) feature.
We welcome that the southern section of the site will discharge to surface water, rather than any deep infiltration system. However, we would highlight that while ground conditions of the southern sections of the site, underlain by the Lambeth Group, would generally be of low permeability, there is the potential for unmapped solution features within the Lambeth group itself (particularly in areas where it is thinner). These could allow rapid transit of contaminants to the Source Protection Zone and associated water supply springs. As such some controls and safeguards in drainage features may be required (i.e. lining of detention basins in area of suspected dolines).

Our other previous comments would still apply with regards to the wider drainage strategy.

Response to consultee comments

We have also reviewed ‘Appendix C.1 Response to consultee comments’ (22 July 2019, ref: A231-TN08A) in relation to concerns regarding protection of groundwater. In particular, we note the request that condition 3 is reworded as follows -

“No building or structure, including drainage infrastructure and utility trenches shall be located within a 10m stand-off zone surrounding any solution feature, unless appropriate mitigation measures are undertaken and approved in writing.”

It is stated that this is to allow the possibility of minor works or mitigation (such as solution stabilisation) within the vicinity of solution features.

We can confirm that we have no fundamental issue with this approach. However, it would need to be on a case by case basis. We may find it acceptable for some development in the vicinity of a stabilised SUDs, but we certainly would not accept location of infiltration features from higher risk areas (such as roads) in the immediate vicinity of a solution feature (stabilised or not).

The scope/detail of any works in the vicinity of solution features should be agreed in writing with us prior to any development. Therefore, we could accept the following wording -

“No building or structure, including drainage infrastructure and utility trenches shall be located within a 10m stand-off zone surrounding any solution feature, unless appropriate mitigation measures are undertaken and subject to prior approval in writing.”

10/3/20

We have no comments to make regarding the additional information submitted.
I have reviewed the Peter Brett Associates Preliminary Risk Assessment and ground intrusive soil and gas investigation Reference 42208/3501/ Rev 2/ November 2018. 60 trial pits were dug and 4 rounds of ground gas monitoring were undertaken as well as a ground water assessment as part of the intrusive site investigation.

The content of the report satisfactorily addresses requirements for submission to the local authority. After undertaking a site walkover and completing a conceptual site model with preliminary risk assessment, risks to receptors were deemed low to negligible, with few potential sources of contamination impacting the site. Further, apparent sources of ground gas are considered to be negligible and reported radon levels are below action limits. While asbestos was not referred to in the report, there are buildings and hardstandings on site which may be planned for demolition and a suitable assessment of risks prior to demolition is required.

No test was undertaken for pesticides, despite likely historic agricultural use and the use of the surrounding fields, however, further testing of site won material will be required, as part of the verification process.

After review of the report findings I am satisfied that no further investigations into potential contaminated land are required. However, verification is required on site, as outlined in the above report and to include:

1 Testing for common contaminants during validation of site won material used for topsoil.

Sampling to be undertaken at a rate of one sample per 250m3. Any material imported to the site should also be tested for contaminants at a rate of one sample per 100m3;

Testing is particularly relevant in the areas of made ground eg Area C - the Contractors compound.

2. Use of a ‘competent person’ as a watching brief during development to identify unsuspecting contamination;

Further, as a proposed development sensitive to contamination, given the findings of the above report, the following conditions are recommended to be attached to the Decision Notice:-

IC05 - Remedial Method statement required.
IC06 - Validation of remedial works
IC07 - Unsuspected contamination found on site
In the event that unsuspected contamination is found all development work must stop immediately and the LPA informed. To help ensure developers submit information to the standard expected by this Authority, Environmental Health has put together a leaflet entitled "Development on Potentially Contaminated Land", available as a download on the following East Hampshire District Council website:

At the back of this document is a template for a Completion Certificate which can be used to document all site investigation work undertaken on site. A certificate of this nature is required to be submitted to the LPA before discharge of the final contaminated land condition.

12/3/20

I have no additional comments subsequent to my comments of 13/8/2019 and 29/1/2019.

**Environmental Health (Pollution) - EHDC**

31/1/19

I have reviewed the relevant documents for this planning application. In terms of noise and vibration, I am satisfied that the background sound levels have been suitably quantified, and that the assessment of impact identifies appropriate sensitive receptors. The preliminary construction noise assessment indicates that no significant adverse impacts are predicted, although there may be temporary increases above the daytime 75dBLAeq, 10hr at receptors closest to construction site boundaries.

The report also assesses the site suitability. The preliminary assessment indicates that there are properties within the proposed development in the Southern parcel, close to the A3(M) and B2149 which are likely to require uprated acoustic glazing and acoustic trickle ventilation. Furthermore, the outdoor sound levels are predicted to exceed desired design targets at these locations.

I would like to recommend the following noise conditions be applied to any consent granted:

A detailed assessment of site suitability to be submitted to the LPA at the detailed design stage, to determine the exact acoustic specifications of any mitigation measures required for the proposed development, to ensure a suitable sound climate internally and externally.

A detailed construction noise assessment to be submitted to the LPA for approval once a detailed construction method statement and construction programme are available. This will ensure that suitable mitigation measures can be applied during the demolition and construction process, to minimise disturbance to sensitive receptors.
An assessment following the guidance contained in BS 4142:2014 “methods for rating and assessing industrial and commercial sound” shall be submitted to the LPA for approval at the detailed design stage, to determine and minimise noise Impacts to sensitive receptors nearby from these noise sources.

I have also reviewed the lighting and air quality assessment and am satisfied that no significant adverse effects are predicted on human health.

The dust assessment within the air quality report indicates the potential for impacts but with the dust mitigation measures detailed in Table 4.13 of chapter 4, I am satisfied that dust emissions can be adequately controlled. These measures are detailed in the CEMP which is included with the submission.

I have no further comments to make.

3/10/19
Apologies but although I read the report I didn’t respond. I don’t have any comments on the noise submission as it is related to the consultation response by Hampshire County Council about protection of well heads.

Forestry Commission

27/2/19
I attended a presentation on the Draft Local Plan on Monday and one of your colleagues happened to mention that there had been a new planning application submitted for the Land east of Horndean as described below:

‘55562/005 | Outline planning application with all matters reserved, except the means of access to the highway network (junction arrangements) and associated highway improvements, for the demolition of existing buildings and the residential-led (C3) mixed-use development of the site with up to 800 dwellings, up to 2ha of employment land (uses B1 and B2), a Local Centre (including: local retail (food and non-food A1); financial and professional services (A2); restaurants, cafés, and drinking establishments (A3 and A4), hot food takeaways (A5), together with a primary school (D1) and community facilities (D2)), informal and formal open space, allotments, and acoustic bunds, together with associated drainage, utilities and all other associated and necessary infrastructure | Development Land East of Horndean, Rowlands Castle Road, Horndean, Waterlooville’

I wrote to you previously to notify you that although the developers had stated in their report on Bats that they were working with the Forestry Commission for the placement of bat boxes on our land at The Holt and Havant Thicket, there was no agreement between the parties. The situation has not changed and we have not been approached by any developers with such a proposal or had the opportunity to discuss with them the implications on the future management of our land of what they would like us to do. I was therefore surprised to read in the above application the following as the proposed mitigation for the impact on Bats:
‘This deficiency can be addressed by the installation of a substantial quantity of bat boxes within the Holt and Havant Thicket. Such an undertaking would be subject to landowner agreement and undertaken as a strategic conservation initiative in co-ordination with other stakeholders including the Forestry Commission and Portsmouth Water.

**SUMMARY**

6.1 Subject to the implementation of the mitigation measures recommended in Section 4 above, the proposed development can proceed in accordance with applicable legislation and policy and without giving rise to significant residual impacts upon the bat assemblage.’

If the intention is for this mitigation to happen then I would appreciate you confirming that the requirement will be reflected in the s106 agreement.

**Hampshire Fire & Rescue**

No comments.

**Havant Borough Council**

31/1/19

Officers at East Hampshire and the applicant may wish to note that Havant Borough Council's Cabinet and Council meetings are considering HBC's Pre-submission (Regulation 19) draft Local Plan on 30th January 2019. This includes a Local Plan Transport Assessment considering the likely highways impacts of the development proposed in the Havant Local Plan. It is suggested that any application level TA ought to take into consideration the wider context and highway network, in particular on the road network connecting the site with the A27 to the south. The Draft Havant Local Plan and the associated evidence base will be published on 22nd January 2019 at www.havant.gov.uk/localplan, and it is suggested that the information could be relevant to such a significant development in the southern part of East Hampshire.

In overall summary we would advise that Havant Borough Council has No Objection to this application.

27/8/19

Thank you for consulting Havant Borough Council, as a neighbouring authority. Following consideration of the amended details Havant Borough Council raises No Objection to this proposal.
HCC Archaeologist

17/12/18

The site lies in an area of some archaeological interest and certainly should be considered to have the potential to contain previously unidentified archaeological finds and features, in particular of Roman and later prehistoric date. Recent investigations in the surrounding area have consistently recorded previously unidentified finds and features of this date and similar should be anticipated. However, there is no reason to believe that archaeology would present an overriding concern and as such would not be a trigger for EIA.

We have been consulted on this development on a number of occasions over the past 4 years in regards to a planning application and we have advised that the proposal would be likely to have an adverse impact upon the archaeological resource and as a result three conditions were attached to planning permission 55562/001 requiring an archaeological evaluation of those parts of the site earmarked for imminent development, followed (if required) by mitigation works and then the full publication of the results. I believe that a Written Scheme of Investigation (WSI) has been prepared by an archaeological contractor for an archaeological evaluation of the first phase of development and that this WSI has been approved by East Hampshire District Council (EHDC). We are aware that further phases of development are planned and that in time these areas should also be investigated under the terms of Conditions 16-18.

6/8/19

We have been consulted on this development on a number of occasions over the past 4 years in regards to a planning application and we have advised that the proposal would be likely to have an adverse impact upon the archaeological resource and as a result three conditions (16-18) were attached to planning permission 55562/001 requiring an archaeological evaluation of those parts of the site earmarked for imminent development, followed (if required) by mitigation works and then the full publication of the results.

We are aware that further phases of development such as this are planned and therefore this site should also be investigated under the terms of Conditions 16-18.

4/3/20

Having reviewed the revised documentation that has been attached to the above application on your website, I can confirm that I do not wish to add to the advice I offered in regard to this proposed development (sent to EHDC on 5th August 2019). I note that a copy of this advice is attached to the 'comments?' section of the website.
Thank you for consulting us on the above planning application. Hampshire County Council as Lead Local Flood Authority has provided comments in relation to the above application as our statutory consultee role in relation to surface water drainage for major development.

Works in relation to ordinary watercourses

PLEASE NOTE: If the proposals include works to an ordinary watercourse, under the Land drainage Act 1991, as amended by the Flood and Water Management Act 2010, prior consent from the Lead Local Flood Authority is required. This consent is required as a separate permission to planning.

Information on ordinary watercourse consenting can be found at the following link
http://www3.hants.gov.uk/flooding/hampshireflooding/watercourses.htm

It is strongly recommended that this information is reviewed before Land Drainage consent application is made.

A Pre-application service for Ordinary Watercourse Consents is available, allowing consents to go through in a smoother, often more timely manor. For full information please visit:

https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/WatercoursePre Application

**Surface Water Drainage**

We have reviewed the following information in relation to the planning application:

- Environmental Statement Technical Appendix K: Water Environment
  - Flood Risk Assessment & Drainage Strategy Report ref: A231-R002A
  - Preliminary Ground Conditions and Drainage Zoning Plan ref: 42208-TN003
- General Arrangement – Sheet 2 of 7 ref: VD18678/100-2 D
- General Arrangement – Sheet 3 of 7 ref: VD18678/100-3 D
- General Arrangement – Sheet 4 of 7 ref: VD18678/100-4 D
- General Arrangement – Sheet 5 of 7 ref: VD18678/100-5 D
- General Arrangement – Sheet 6 of 7 ref: VD18678/100-6 C
- General Arrangement – Sheet 7 of 7 ref: VD18678/100-7 B

This application has all matters reserved except for means of access to the highway network and associated highway improvements.
Highway Works

In relation to the highway works which we consider as a full application, there is no information in relation to surface water provision. As such, we would request that the applicant review our checklist which details the information we require to review the surface water provision. The checklist can be found at:

https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning

We recommend that this information is provided before planning permission is granted.

The nature of the area means that there may be ordinary watercourses present and where new access points are required, these may have to be culverted or diverted. These activities, if required, would be subject to ordinary watercourse consent which will need to be undertaken as a separate process to the planning application.

Wider Development

For the wider site, with all matters reserved, we have the following comments.

The Flood Risk Assessment and Geotechnical information provided is at a very high level due to the nature and size of the site. The overall principles appear sound and the drainage strategy principles are considered in accordance with best practise with infiltration used where feasible and discharge points being limited to greenfield rates.

It is noted that although deep bore soakaways are mentioned, these are documented as not considered appropriate for this area due to sensitivities in groundwater as well as soil types. We would highlight that we consider deep bore soakaways a last resort option so would not support these if they were proposed at a later date.

It is also noted that the geotechnical report highlights a variance in the offset between structures and infiltration features. This report should be referred to in future reserved matters and discharge of condition applications to ensure these limitations are taken into account. Additional testing should be undertaken particularly with the potential for karst features in some areas.

Given the uncertainty around the details of the proposed development, we are not able to provide detailed comments in relation to the drainage strategy and these will have to be developed and submitted as different phases are progressed.

We would recommend the following conditions are applied to each future phase:
1. No development shall begin until a detailed surface water drainage scheme for the site, based on the principles within the Flood Risk Assessment & Drainage Strategy ref: A231-R002A and Preliminary Ground Conditions and Drainage Zoning Plan ref: 42208-TN003, has been submitted and approved in writing by the Local Planning Authority. The submitted details should include:

a. A technical summary highlighting any changes to the design from that within the approved Flood Risk Assessment.

b. Infiltration test results undertaken in accordance with BRE365 and providing a representative assessment of those locations where infiltration features are proposed.

c. Detailed drainage plans to include type, layout and dimensions of drainage features including references to link to the drainage calculations.

d. Detailed drainage calculations to demonstrate existing runoff rates are not exceeded and there is sufficient attenuation for storm events up to and including 1:100 + climate change.

e. Evidence that urban creep has been included within the calculations.

f. Confirmation that sufficient water quality measures have been included to satisfy the methodology in the Ciria SuDS Manual C753.

g. Exceedance plans demonstrating the flow paths and areas of ponding in the event of blockages or storms exceeding design criteria.

2. Details for the long term maintenance arrangements for the surface water drainage system shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of any of the dwellings. The submitted details shall include:

a. Maintenance schedules for each drainage feature type and ownership.

b. Details of protection measures to ensure features are not damaged during the works.

Please see below for further general guidance for the application:

It is important to ensure that the long-term maintenance and responsibility for Sustainable Drainage Systems is agreed between the Local Planning Authority and the applicant before planning permission is granted. This should involve discussions with those adopting and/or maintaining the proposed systems, which could include the Highway Authority, Planning Authority, Parish Councils, Water Companies and private management companies.

For SuDS systems to be adopted by Hampshire Highways it is recommended that you visit the website at:
https://www.hants.gov.uk/transport/developers/constructionstandards for guidance on which drainage features would be suitable for adoption.
Where the proposals are connecting to an existing drainage system it is likely that the authorities responsible for maintaining those systems will have their own design requirements. These requirements will need to be reviewed and agreed as part of any surface water drainage scheme.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

18/7/19

Thank you for consulting us on the above planning application. Hampshire County Council as Lead Local Flood Authority has provided comments in relation to the above application as our statutory consultee role in relation to surface water drainage for major development.

Works in relation to ordinary watercourses 2 PLEASE NOTE: If the proposals include works to an ordinary watercourse, under the Land drainage Act 1991, as amended by the Flood and Water Management Act 2010, prior consent from the Lead Local Flood Authority is required. This consent is required as a separate permission to planning.

Information on ordinary watercourse consenting can be found at the following link http://www3.hants.gov.uk/flooding/hampshireflooding/watercourses.htm

It is strongly recommended that this information is reviewed before Land Drainage consent application is made.

A Pre-application service for Ordinary Watercourse Consents is available, allowing consents to go through in a smoother, often more timely manner. For full information please visit:

https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/WatercoursePreApplication

Surface Water Drainage

We have reviewed the following information in relation to the planning application:

- Environmental Statement Technical Appendix K: Water Environment
  - Flood Risk Assessment & Drainage Strategy Report ref: A231-R002A
  - Preliminary Ground Conditions and Drainage Zoning Plan ref: 42208-TN003

- General Arrangement – Sheet 2 of 7 ref: VD18678/100-2 D
- General Arrangement – Sheet 3 of 7 ref: VD18678/100-3 D
- General Arrangement – Sheet 4 of 7 ref: VD18678/100-4 D
- General Arrangement – Sheet 5 of 7 ref: VD18678/100-5 D
- General Arrangement – Sheet 6 of 7 ref: VD18678/100-6 C
- General Arrangement – Sheet 7 of 7 ref: VD18678/100-7 B
This application has all matters reserved except for means of access to the highway network and associated highway improvements.

Highway Works

In relation to the highway works which we consider as a full application, there is no information in relation to surface water provision. As such, we would request that the applicant review our checklist which details the information we require to review the surface water provision. The checklist can be found at: https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning

We recommend that this information is provided before planning permission is granted.

The nature of the area means that there may be ordinary watercourses present and where new access points are required, these may have to be culverted or diverted. These activities, if required, would be subject to ordinary watercourse consent which will need to be undertaken as a separate process to the planning application.

Wider Development

For the wider site, with all matters reserved, we have the following comments. The Flood Risk Assessment and Geotechnical information provided is at a very high level due to the nature and size of the site. The overall principles appear sound and the drainage strategy principles are considered in accordance with best practise with infiltration used where feasible and discharge points being limited to greenfield rates.

It is noted that although deep bore soakaways are mentioned, these are documented as not considered appropriate for this area due to sensitivities in groundwater as well as soil types. We would highlight that we consider deep bore soakaways a last resort option so would not support these if they were proposed at a later date.

It is also noted that the geotechnical report highlights a variance in the offset between structures and infiltration features. This report should be referred to in future reserved matters and discharge of condition applications to ensure these limitations are taken into account. Additional testing should be undertaken particularly with the potential for karst features in some areas.

Given the uncertainty around the details of the proposed development, we are not able to provide detailed comments in relation to the drainage strategy and these will have to be developed and submitted as different phases are progressed.

We would recommend the following conditions are applied to each future phase:
1. No development shall begin until a detailed surface water drainage scheme for the site, based on the principles within the Flood Risk Assessment & Drainage Strategy ref: A231-R002A and Preliminary Ground Conditions and Drainage Zoning Plan ref: 42208-TN003, has been submitted and approved in writing by the Local Planning Authority. The submitted details should include: a. A technical summary highlighting any changes to the design from that within the approved Flood Risk Assessment.
   b. Infiltration test results undertaken in accordance with BRE365 and providing a representative assessment of those locations where infiltration features are proposed
   c. Detailed drainage plans to include type, layout and dimensions of drainage features including references to link to the drainage calculations.
   d. Detailed drainage calculations to demonstrate existing runoff rates are not exceeded and there is sufficient attenuation for storm events up to and including 1:100 + climate change.
   e. Evidence that urban creep has been included within the calculations.
   f. Confirmation that sufficient water quality measures have been included to satisfy the methodology in the Ciria SuDS Manual C753.
   g. Exceedance plans demonstrating the flow paths and areas of ponding in the event of blockages or storms exceeding design criteria.

2. Details for the long term maintenance arrangements for the surface water drainage system shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of any of the dwellings. The submitted details shall include; a. Maintenance schedules for each drainage feature type and ownership
   b. Details of protection measures to ensure features are not damaged during the works

It is important to ensure that the long-term maintenance and responsibility for Sustainable Drainage Systems is agreed between the Local Planning Authority and the applicant before planning permission is granted. This should involve discussions with those adopting and/or maintaining the proposed systems, which could include the Highway Authority, Planning Authority, Parish Councils, Water Companies and private management companies.

For SuDS systems to be adopted by Hampshire Highways it is recommended that you visit the website at: https://www.hants.gov.uk/transport/developers/constructionstandards for guidance on which drainage features would be suitable for adoption.

Where the proposals are connecting to an existing drainage system it is likely that the authorities responsible for maintaining those systems will have their own design requirements. These requirements will need to be reviewed and agreed as part of any surface water drainage scheme.
We note that we responded to this planning application on the 18 April 2019 raising no objection subject to the imposition of planning conditions. The revised Flood Risk Assessment and Drainage Strategy does not change the way that Surface Water would be managed when you compare it with the previously submitted.

Therefore, our formal response dated 18 April 2019 still stands (see attached).

Hampshire County Council as Lead Local Flood Authority has provided comments in relation to the above application in our role as statutory consultee on surface water drainage for major developments.

In order to assist applicants in providing the correct information to their Local Planning Authority for planning permission, Hampshire County Council has set out the information it requires to provide a substantive response at https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning

The County Council has reviewed the following documents relating to the above application:

• Highway Drainage Network Surface Water Drainage Strategy ref: VD18678/170

• Technical and Design Response To Issues Raised By Consultees ref: 1510.78

It is noted that substantial lengths of existing watercourse are proposed to be amended. Please note that culverting will not be acceptable without demonstrating that there is no way of retaining an open watercourse within the site boundary. It is recommended that discussions are held prior to the fixing of the site layout to review the principles of the amendments to ordinary watercourses. This permission falls outside of the planning remit however is integral to the drainage proposals.

The information provided now gives sufficient information and as the development progresses through reserved matters and discharge of conditions, the additional drainage information can be provided.
We would highlight that once it is sought to fix the layout for this development there will be limited scope to amend drainage proposals so when the reserved matters application is sought in relation to layout, points a, c, d and e should be addressed from suggested condition 1 as detailed below. If necessary, this could be included as a separate condition.

1. No development shall begin until a detailed surface water drainage scheme for the site, based on the principles within the Flood Risk Assessment & Drainage Strategy ref: A231-R002A and Preliminary Ground Conditions and Drainage Zoning Plan ref: 42208-TN003, has been submitted and approved in writing by the Local Planning Authority. The submitted details should include:

   a. A technical summary highlighting any changes to the design from that within the approved Flood Risk Assessment.
   b. Infiltration test results undertaken in accordance with BRE365 and providing a representative assessment of those locations where infiltration features are proposed
   c. Detailed drainage plans to include type, layout and dimensions of drainage features including references to link to the drainage calculations.
   d. Detailed drainage calculations to demonstrate existing runoff rates are not exceeded and there is sufficient attenuation for storm events up to and including 1:100 + climate change.
   e. Evidence that urban creep has been included within the calculations.
   f. Confirmation that sufficient water quality measures have been included to satisfy the methodology in the Ciria SuDS Manual C753.
   g. Exceedance plans demonstrating the flow paths and areas of ponding in the event of blockages or storms exceeding design criteria.

2. Details for the long term maintenance arrangements for the surface water drainage system shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of any of the dwellings. The submitted details shall include:

   a. Maintenance schedules for each drainage feature type and ownership
   b. Details of protection measures to ensure features are not damaged during the works

As a statutory consultee, the County Council has a duty to respond to consultations within 21 days. The 21 day period will not begin until we have received sufficient information to enable us to provide a meaningful response.

Please ensure all data is sent to us via the relevant Local Planning Authority.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.
After reviewing the Minerals Safeguarding document, supplied with the application, Hampshire County Council as the Minerals and Waste Planning Authority deem the clay present on the site not viable for extraction.

However, the proposed development lies within the mineral and waste consultation area (MWCA) – Sites section.

It lies adjacent to the safeguarded Horndean Oil Well Sites (X and B) operated by IGas Energy.

This area is informed by the safeguarded sites list as defined through Policy 16: Safeguarding – mineral infrastructure and Policy 26: Safeguarding – waste infrastructure of the adopted Hampshire Minerals and Waste Plan (2013) (HMWP).

The purpose of these policies is to protect current and potential minerals and waste sites from pressures to be replaced by other forms of development, including through ‘encroachment’ where nearby land-uses impact their ability to continue operating.

It is often the case that appropriate buffers and mitigation measures can make potential nearby development compatible. Any mitigation measures would need to be undertaken by the proposed non-minerals or waste development and reduce potential impacts to and from the safeguarded site to levels that would ensure the safeguarded site could continue its intended minerals or waste use.

Usually the mitigation measures would need to focus on impacts such as noise, dust, visual impact, odour and traffic movements. They can take a variety of forms, including landscape design, tree planting, barriers, building design and orientation and use of different building materials (such as double glazing for windows).

The appropriate mitigation measures are best informed through direct discussions with the operator of the safeguarded site as they will be most aware of operational requirements. However HCC is also available for further discussions, as well as facilitation, if required.

In order to discharge the requirements of the safeguarding policy, HCC would expect to see how the nearby safeguarded site was considered, how operator comments were taken into account and what impacts that had on the proposed development design. If the details of mitigation are to follow in a future application, HCC would expect to see a condition requiring such details.

In the unlikely event that it is not possible to agree appropriate mitigation measures, HCC would be seeking evidence that the minerals or waste management capacity can be relocated or provided elsewhere and delivered.
Further information on safeguarding and Hampshire County Council’s approach to it is available in the adopted Minerals and Waste Safeguarding in Hampshire Supplementary Planning Document, which can be found on our website: http://www3.hants.gov.uk/mineralsandwaste/planning-policyhome/hmwp-spds.htm.

16/9/19

Thank you for acknowledging the points raised by Hampshire County Council as the Minerals and Waste Planning Authority (MWPA) with regards to the above application.

However, after reviewing the technical note, “Safeguarding Existing Oil Well Sites – Acoustics” we have now concluded that Policy 16: Safeguarding – mineral infrastructure and Policy 26: Safeguarding – waste infrastructure will not be breached by this application. As a result, the Planning Policy team has no further comments to make.

Further information on safeguarding and Hampshire County Council’s approach to it is available in the adopted Minerals and Waste Safeguarding in Hampshire Supplementary Planning Document, which can be found on our website: http://www3.hants.gov.uk/mineralsandwaste/planning-policyhome/hmwp-spds.htm

**Housing - EHDC**

14/01/2019

There have been lengthy and detailed discussions over the last year with regards to the affordable housing scheme, which includes a Deed of Variation to the s106.

I have no objection to this new outline application, which proposes an additional 100 dwellings as the affordable housing numbers have been adjusted accordingly.

Whilst this is a fresh application I would wish to see a detailed affordable housing scheme broadly in line with the provisions of the existing s106 agreement, which includes a 5% provision for fully accessible wheelchair (affordable) housing.

17/3/20 & 20/8/19

No further comments.

**Landscape Officer - EHDC**

14/1/19

I have no landscape objection subject to the following requirements:
Advance structure planting should be carried out wherever possible to address the loss of existing hedgerows and trees (e.g., along Havant Road) and to soften the edges of the site adjacent to the SDNP boundary to the east of the site.

A strong sustainable transport strategy based on 3m wide, suitably lit and appropriately surfaced pedestrian/cycle ways that demonstrate connection to key local destinations, to public transport and outwards to the existing wider context of the sustainable transport network. Cycle path provision connecting south towards Havant Thicket is particularly important.

The proposed allotments will require vehicular access and appropriate parking provision. At present the masterplan does not demonstrate sufficient infrastructure required to service the allotments.

Detailed landscape information for the residential, commercial and community areas, open spaces and proposed acoustic bunds will be expected at reserved matters stage.

13/3/20

No additional landscape comments.

**HCC Ecologist**

23/1/19

The application is accompanied by a suite of ecological assessment reports. These are summarised within the Ecology chapter of the Environmental Statement (Terence O'Rourke, December 2018) and detailed habitat and species reports are contained within the ES appendices (all EPR, November 2018). I provided detailed consultation advice on the 2014 application and, as the proposal is largely identical (at least in terms of its physical impacts on habitats, although the area and density of development has been amended in several areas), I will not repeat that information here. In summary, I am broadly content with the scope of ecological submissions and the conclusions of the impact assessments.

This is a substantial application which will entail significant land-use change at the application site. The scale of the proposals means that there is significant scope for ecological impact and I am pleased that a detailed programme of ecological survey and assessment has been undertaken. The scope and scale of the ecological surveys carried out to date is sound and I do not consider that there are any overriding gaps in the current understanding of the site, albeit that further survey will always provide more robust results and there will be a requirement for future surveys to further inform mitigation measures. We have a good evidence base at the current time and this would seem to be sufficient to enable a reasoned assessment of likely impact.
**Bats**

The most significant constraint is the presence of Bechstein’s bat, with the site itself as well as land in close proximity supporting significant maternity roosts of this nationally-important species. Detailed site surveys, including capture and radio-tracking and roost counts, have revealed that the site forms part of the roosting, foraging and commuting habitat of the local metapopulation. The previous application included a detailed mitigation and enhancement strategy based upon evidence collected on bat behaviour and distribution. Surveys in 2017 and 2018 have added to the sum of knowledge but have not resulted in any material changes to the overall strategy. The mitigation proposals will maintain and enhance habitat linkages between Dell Piece East and The Holt. The site supports a high number of bat species and, in general, mitigation measures for Bechstein’s bats will apply to other species.

The amended layout will increase residential development around the identified maternity roost location within the central wood pasture habitat. The previous masterplan shows a slightly different housing layout in the triangular parcel south of Dell Piece (Phase 3 parcel), with what appears to be a greater area of open greenspace lying north of the housing. This is a minor point and I raise it simply to reinforce the point that the constraints due to Bechstein’s bats in particular are substantial and that any lessening of the protection for their roosts and habitat will be viewed as unacceptable.

Overall, I am content that the previously-agreed bat mitigation strategy remains valid. I would very much encourage the provision of bat roosting boxes both on site and within third-party land where possible. The results of bat prey remains analysis can be used to fine-tune any mitigation.

**Habitats & Vegetation**

Detailed botanical surveys have been updated and the conservation status of some habitats has been amended. Overall, I am content that the composition, distribution and value of habitats across the site has been assessed robustly. There will be a significant loss of grassland and hedgerow habitat across the site, in addition to the loss of some woodland at Soakfield Row.

Hedgerow loss and disturbance is a key issue here, with much of the existing network to be impacted. I appreciate that in the longer-term there will be a net increase in this habitat type and this is welcomed. I would strongly recommend the use of hedgerow translocation as a viable option – it would enable local genetic stock to remain on site (with obvious benefits) and perhaps provide a timelier solution to the immediate loss of habitat (reducing the lag between loss and establishment of planted whips). There would appear to be plenty of room for making this a sensible option and I would expect to see this included, where appropriate, within any future detailed landscape strategy.
I would also strongly recommend the use of a native-dominated general landscaping scheme. The use of native plant species within residential and commercial schemes is well-established and for a proposal of this size and scope there would seem to be every incentive to create something innovative, providing a truly holistic approach to ecology and green and blue infrastructure. The use of a standard default landscaping palette of ornamental stock would be a missed opportunity I feel and I would strongly oppose it.

_Hazel Dormice_

Dormice are present across the site and will be impacted by the proposed scale of hedgerow loss. As with the previous iteration, proposals include the planting of c.5km of new hedgerow, the planting up of existing gaps and the installation of dormouse nest boxes. These measures are all acceptable and will, in time, hopefully result in an enhanced site for the species. Again, the fine details are crucial and ongoing management is as important as establishment. The timing of new plantings is key – the earliest possible opportunity should be taken to create new habitat, preferably using established mature plant stock or translocated hedgerows from elsewhere on site. This last technique is a good option for this site – there is ample room and access and it can be expected that a transplanted mature hedge will be suitable for dormice quicker than a newly planted one.

_Reptiles_

I am content that the mitigation measures proposed for common reptile species are acceptable.

_Birds_

The proposed loss of open grassland, arable land and hedgerows will inevitably result in a loss of bird habitat. The proposed increased hedgerow planting will, over time, provide a net gain in hedgerow nesting and foraging habitat. However, the net loss of open grassland will remain unmitigated. Overall, I remain content that, on balance, the mitigation, compensation and enhancement measures are acceptable.

_Great crested Newt_

GCN are considered to be absent from the application site and surrounding land. No further work is required.
Invertebrates

The variety of typical lowland habitats within the site provides the basis for invertebrate interest, with the rarer species being associated with some specific habitats such as deadwood, rank grassland and woodland. In simple terms, as long as the variety and quality of habitats is maintained through appropriate management then the invertebrate interest should be retained despite the obvious losses. The proposed mitigation will result in the retention and enhancement of areas of grassland, wetland, hedgerow and woodland and recommendations are given for the sympathetic management of these habitats to promote variation.

Designated Sites

The submitted Information for Habitats Regulations Assessment (EPR, November 2018) provides an assessment of the potential impacts of the proposal, alone and/or in combination with other known developments, on European-designated sites.

The site lies outside the 5.6Km buffer zone within which contributions towards the Solent Recreation Mitigation Strategy are required. The potential for impacts to air quality, water supply and water quality are considered to be non-significant. I am in agreement with this conclusion and EHDC can have confidence that the submitted information is sufficient to enable a Habitats Regulations Assessment by the competent authority can conclude no likely significant effect.

If you are minded to grant permission, can I suggest that all ecological mitigation, compensation and enhancement measures are secured through the submission of a site-wide ecological mitigation and enhancement strategy. This should include full details of all proposed measures and should incorporate post-development monitoring. The mitigation and enhancement strategy should be fully compatible with other submissions such as landscaping, lighting and drainage strategies. In addition, a Construction Environment Management Plan (CEMP) should be secured in order to ensure that the construction phase of any development takes full account of ecological constraints.

Prior to the commencement of development activities in each phase of development, a detailed Ecological Mitigation and Enhancement Strategy shall be submitted to and agreed in writing by the local planning authority. This strategy shall be in accordance with the outline ecological mitigation and enhancement measures detailed within the Environmental Statement (Terence O'Rourke, December 2018) and ES Appendices (all EPR, November 2018) unless otherwise agreed in writing by the Local Planning Authority. The Strategy shall include (but not be restricted to): details of all habitat- and species-related avoidance and mitigation measures (e.g. timings, methods, responsibilities); plans of, and details describing, all habitat impacts and measures to compensate impacts (e.g. location, methods of establishment, responsibilities, care and maintenance); plans and details of all habitat- and species-related enhancement measures (e.g. location, methods, responsibilities, care and maintenance); a programme of ongoing ecological monitoring. Reason: to protect biodiversity in accordance with the Conservation Regulations 2017, Wildlife & Countryside Act 1981, the

In addition:

Prior to the commencement of development activities in each phase of development, a Construction Environment Management Plan (CEMP) shall be submitted to and agreed in writing by the local planning authority. This CEMP shall include (but not be restricted to): specifications for construction timing and logistics; pollution prevention measures; measures to control surface water run-off and the emission of dust and noise; and specific measures to avoid or mitigate damage and disturbance to important species and habitats. Reason: to protect biodiversity in accordance with the Conservation Regulations 2017, Wildlife & Countryside Act 1981, the NERC Act (2006), NPPF and with Policy CP21 of the East Hampshire District Local Plan: Joint Core Strategy.

1/10/19

I can confirm that, as with the original application proposal and subsequent submissions, I have no overriding in-principle concerns with the submitted ecological information. I have been involved with this proposal for a number of years and was involved with early discussions with the applicant and their ecologists in respect to survey design and mitigation/compensation/enhancement opportunities. I remain of the opinion that, whilst the ecological impacts clearly cannot be dismissed (such a large site cannot be developed without significant effects on multiple receptors), the ecological assessment works (particularly for bats) have resulted in a detailed understanding of how ecological receptors use the site. Mitigation measures have been designed to explicitly encompass observed flight corridors used by bat species and to maintain linkages between identified key foraging and roosting habitats. In my opinion, and in lieu of a complete revision of the proposed site layout, the proposed bat mitigation/compensation strategy provides a rational approach to the identified constraints.

I am fully supportive of any collaborative bat mitigation measures. The eastern Hampshire Bechstein’s bat population in particular is likely to come under increased pressure from development in coming years (this and other residential sites, Havant Thicket reservoir). It is important that LPAs, developers, landowners and woodland managers seek to work together towards avoiding and mitigating impacts to this species (and other bat species) and providing habitat enhancements wherever possible. At the current time there is no mechanism for securing such collaborative measures: success is dependent upon different parties agreeing measures themselves. It is hoped that for this proposal the applicant can agree the provision of bat enhancement measures with the Forestry Commission. Hampshire County Council (landowners at Staunton Country Park) are another potential partner in seeking to increase artificial bat roosting opportunities.
I welcome the additional detail on the impacts to Soakfield Row. It is worth noting that the Row is not listed in the Ancient Woodland Inventory for Hampshire (it may be too small) but does clearly represent woodland Priority Habitat. The direct loss of woodland habitat has been reduced by a significant extent, although c.470m² will still be lost. The direct loss will be mitigated/compensated by the translocation of woodland soils to a receptor site lying north of Soakfield Row and the provision of new woodland planting. If the impacts to Soakfield Row are unavoidable (this judgement is outside my remit) then I would suggest that the proposed measures are proportionate to the impact and would result in an extension of woodland habitat over time and buffering of the existing and newly-created woodland. I agree with Natural England that additional opportunities for tree/woodland plantings across the development site would be welcome.

As previously, I consider that the most sensible option is to provide a site-wide ecological mitigation and enhancement strategy. This should include full details of all proposed measures and should incorporate post-development monitoring (to include process of reporting to the LPA, HBIC). The mitigation and enhancement strategy should be fully compatible with other submissions such as landscaping, lighting and drainage strategies. In addition, a Construction Environment Management Plan (CEMP) should be secured in order to ensure that the construction phase of any development takes full account of ecological constraints.

Prior to the commencement of development activities in each phase of development, a detailed Ecological Mitigation and Enhancement Strategy shall be submitted to and agreed in writing by the local planning authority. This strategy shall be in accordance with the outline ecological mitigation and enhancement measures detailed within the Environmental Statement (Terence O’Rourke, December 2018), ES Appendices (all EPR, November 2018) and Technical Response (EPR, July 2019) unless otherwise agreed in writing by the Local Planning Authority. The Strategy shall include (but not be restricted to): details of all habitat- and species-related avoidance and mitigation measures (e.g. timings, methods, responsibilities); plans of, and details describing, all habitat impacts and measures to compensate impacts (e.g. location, methods of establishment, responsibilities, care and maintenance); plans and details of all habitat- and species-related enhancement measures (e.g. location, methods, responsibilities, care and maintenance); a programme of ongoing ecological monitoring. Reason: to protect biodiversity in accordance with the Conservation Regulations 2017, Wildlife & Countryside Act 1981, the NERC Act (2006), NPPF and with Policy CP21 of the East Hampshire District Local Plan: Joint Core Strategy.

In addition:
Prior to the commencement of development activities in each phase of development, a Construction Environment Management Plan (CEMP) shall be submitted to and agreed in writing by the local planning authority. This CEMP shall include (but not be restricted to): specifications for construction timing and logistics; pollution prevention measures; measures to control surface water run-off and the emission of dust and noise; and specific measures to avoid or mitigate damage and disturbance to important species and habitats. Reason: to protect biodiversity in accordance with the Conservation Regulations 2017, Wildlife & Countryside Act 1981, the NERC Act (2006), NPPF and with Policy CP21 of the East Hampshire District Local Plan: Joint Core Strategy.

30/3/20

Additional information has been submitted in relation to biodiversity (Terence O'Rourke, February 2020). This provides some useful additional information but does not materially change my previous comments. A nutrient budget has been provided which demonstrates that nutrient neutrality can be achieved.

As previously, I consider that the most sensible option is to provide a site-wide ecological mitigation and enhancement strategy. This should include full details of all proposed measures and should incorporate post-development monitoring (to include process of reporting to the LPA, HBIC). The mitigation and enhancement strategy should be fully compatible with other submissions such as landscaping, lighting and drainage strategies. In addition, a Construction Environment Management Plan (CEMP) should be secured in order to ensure that the construction phase of any development takes full account of ecological constraints.

Prior to the commencement of development activities in each phase of development, a detailed Ecological Mitigation and Enhancement Strategy shall be submitted to and agreed in writing by the local planning authority. This strategy shall be in accordance with the outline ecological mitigation and enhancement measures detailed within the Environmental Statement (Terence O'Rourke, December 2018), ES Appendices (all EPR, November 2018) and Technical Response (EPR, July 2019) unless otherwise agreed in writing by the Local Planning Authority. The Strategy shall include (but not be restricted to): details of all habitat- and species-related avoidance and mitigation measures (e.g. timings, methods, responsibilities); plans of, and details describing, all habitat impacts and measures to compensate impacts (e.g. location, methods of establishment, responsibilities, care and maintenance); plans and details of all habitat- and species-related enhancement measures (e.g. location, methods, responsibilities, care and maintenance); a programme of ongoing ecological monitoring. Reason: to protect biodiversity in accordance with the Conservation Regulations 2017, Wildlife & Countryside Act 1981, the NERC Act (2006), NPPF and with Policy CP21 of the East Hampshire District Local Plan: Joint Core Strategy.
In addition:

Prior to the commencement of development activities in each phase of development, a Construction Environment Management Plan (CEMP) shall be submitted to and agreed in writing by the local planning authority. This CEMP shall include (but not be restricted to): specifications for construction timing and logistics; pollution prevention measures; measures to control surface water run-off and the emission of dust and noise; and specific measures to avoid or mitigate damage and disturbance to important species and habitats. Reason: to protect biodiversity in accordance with the Conservation Regulations 2017, Wildlife & Countryside Act 1981, the NERC Act (2006), NPPF and with Policy CP21 of the East Hampshire District Local Plan: Joint Core Strategy.

**HCC Rights of Way**

5/3/19

Thank you for sending us this consultation and please accept our apologies for responding after the deadline. If this response is not too late for consideration, please accept it as being that of Countryside Service, in relation to this application we are responding on behalf of Hampshire County Council as Highway Authority in respect of Public Rights of Way and Commons Registration Authority.

**Site Context**

Horndean Footpath 54 passes along Soakfield Row and forms part of the route National 1006km long Monachs Way. The definitive statement describes the route through Soakfield Row along un-enclosed earth path. Horndean Footpath 25 provides a route along the Monarchs Way through The Holt woodland to Rowlands Castle village and links the Staunton Way. To the west of Blendworth Lodge Horndean Foopath follows Church Path unadopted road providing a link to the east of Horndean. From Pattersons Lane a network of east-west rural footpath routes linking Horndean and Blendworth Lith and Wick Hanger. Horndean Footpaht 24B and Rowlands Castle Bridleway 502 run north- south on the western boundary of the development providing a pedestrian, cycle and equestrian link to the Hazeltown Local Nature Reserve and to the west Sheepwash Road in the southwest.

Pyle Lane road U 210 and Havant road form the boundaries with the South Downs National Park. Within the National Park immediately to the east Pyle Farm Meadow South is locally designated at Site of Importance for Nature Conservation as the Ancient Woodland at The Holt.
Comments

According to National Planning Policy Framework paragraph 98 Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails. The proposals within the outline planning application fail to take full account of the Monach Way that passes along Horndean Footpath 54 within Soakfield Row. The route would be directly affected by the proposed as illustrated in General Arrangement Sheet 4 VD18678/100-04. It is not clear how landscaping planting or ecological mitigation proposals would mitigate these impacts to avoid significant adverse impacts of lighting, noise and visual amenity and major adverse impact on the amenity value and users right to the quiet enjoyment of the footpath caused by the intersection with the proposed access route. We recommend that further consideration needs to be given to an alternative access for the Phase 2 development to the north of Soakfield Row Footpath 54.

General Arrangement Sheet 4 VD18678/100-04 appears to include proposals for surfacing of Horndean Footpath 54 which would have significant impacts on the public right of way and appears inconsistent with proposals to retain or to protect it. Technical Appendix F.8 Dormice and Technical Appendix F.6 Bats appear inconsistent with Land East of Horndean ES Chapter 9: Lighting as the lighting proposals state that Internal primary access roads Secondary and Tertiary internal roads will be lit with 6m and 5m columns. The constraints imposed by the by the Bechstein Bat commuting route and proposals for a bat hopover across Horndean Footpath 54 Soakfield Row do not appear to be adequately taken into account.

For the above reasons we must object to the outline application as currently presented and recommend that further information and clarification is provided and the revision of the access across Soakfield Row and an alternative access from Pyle Lane should be proposed.

We welcome the inclusion of the internal access network including footpaths and cycleways which is in broad accordance with Outline Permission 55562/001. However, we note that the access and green infrastructure proposals do not appear to provide additional or improved links to the existing rights of way and improve links to local facilities and green space provision to this access network. We would except a development of this scale to provide a contribution towards or links and enhancement to the existing rights of way network and access network. Improvement which might be considered are the addition links to the north to provide pedestrian routes via Blendworth Lith and potential upgrading of Footpath 24B to a Bridleway to improve equestrian and cycle.

We would be happy to discuss alternative layouts which protect the public footpath and potential improvements and enhancements or contribution to access network outside the application site with the LPA and developer.
Thank you for the opportunity to comment on the additional information submitted in support of the above application. Unfortunately the majority of the concerns and objections we have raised have not been addressed by the submissions.

Most of additional information submitted, including the Technical Note – Response to HCC comments, does not make reference to, and fails to address the concerns and objections raised in our previous comments. discussed protection of Rights of Way, proposals for the Footpath crossing at Soakfield Row or Jwith Hampshire Countryside Service. We were not party to the meeting referred to in paragraph 1.3 of the Technical Note to HCC.

We note in Technical Note – Response to HCC the do not include the surfaced Bridleway 24A which from part of Havant Borough Council’s promoted cycle routes.

Ecological Assessment

The 'Technical Response to Ecology Consultees' appears to address the inconsistency of the previous recommendation of the retention of dark corridor along Soakfield Road and retention or creation of landscaped bat hop-overs, by providing support for column lighting proposed in the Transport Assessment and Lighting section of the Environmental Statement. We therefore request that the Local Planning Authority and Highway Authority’s Ecological Consultees assess the street lighting proposals and mitigation suggested in section 3.0 where lighting proposals are not in accordance with ILP and BCT guidelines and current best practice. Street lighting of the access road will have an impact on the character and amenity of Footpath 54 which provides access to the wider countryside and South Downs National Park. We note that Map 1 does not show Footpath 54, or therefore confirm whether additional scrub habitat or tree removal would be necessary to provide a suitable crossing of the proposed access road in order to retain and protect this Right of Way.

HCC School Organisation Officer

You will be aware that a signed s106 agreement is already in place based on the number of eligible dwellings originally proposed for the site (582 out of a total of 700).

This new application does not differentiate between eligible and non-eligible dwellings so I have made an assumption at this stage that most of the dwellings are eligible with a small proportion of non-eligible dwellings as part of the mix.
This would give rise to the need for a 210 place (1fe) primary school being required to accommodate the anticipated yield of pupil numbers from this development. The cost of such a provision is costed at £5,308,821 and I would anticipate a contribution from this development to cover the cost of this new primary school. I would also expect 1.6ha of land to be transferred to the County Council at nil consideration (as set out in the original s106 agreement) to allow this school to be built.

The cost of the new primary school is based at 4Q2017 price base (BCI All-in TPI Index of 291) and any payments will be subject to inflation on this figure at the point when any contribution becomes due.

Should there be a need for a new s106 agreement to be drawn up I should be pleased if you could ensure that I am involved in discussions about the timing of the site and contributions to be paid as the triggers in new s106 agreements do not necessarily become scheduled for payment on the prior occupation of a number of dwellings but more so on three or six monthly cycles once the building of the school has commenced to ensure a cash flow for the County Council during the construction of the school.

6/8/19

The proposed development of 800 dwellings is expected to generate a total of 240 additional primary age children and 168 secondary age children. Should there be any one bedroomed dwellings proposed within the development it may be possible to agree a lower yield than quoted which may result in a lower contribution being sought. This is based on a figure of 0.3 primary age children per new dwelling and 0.21 secondary age children which was derived by conducting demographic surveys of developments that have been completed within Hampshire and calculating the average number of primary and secondary age children on those developments.

The development site will be served by the provision of a new 1fe (210 place) primary school and Horndean Technology College. In order to meet this provision a site area of not less than 1.6ha, of useable area, is required to be transferred to Hampshire County Council at nil consideration together with a contribution towards the cost of the new 1fe primary school.

The required primary contribution is £5,308,821 in line with Hampshire County Council’s Developer Contribution Guidance document. This figure is based on the cost of a new 1fe primary school. This figure is based on 4Q2017 price base (BCI All-in TPI Index 291).

The development site is served by Horndean Technology College. This secondary school is full and forecast to remain so for the foreseeable future. Consequently there will be a need to provide additional places within the area to cater for the additional 168 pupils and a contribution is sought from the developer to pay for this expansion. The required secondary contribution is £4,197,819. This figure is based on the cost of a 1fe expansion as set out in the County Council’s Developer Contribution Guidance Document.
It is recognised that this is an increase in the original contribution being sought but is down to two factors. Firstly the cost of the primary school has risen since the original response to this development proposal and, secondly, the number of pupils attending Horndean Technology College has risen and the yield from this development can no longer be accommodated within the existing capacity of the school.

Details of the forecasting methodology used, along with the current pupil numbers at these schools can be found in Appendix A.

The County Council has used recent past projects to derive costs for the proposed expansion/s – details and a explanation can be found in the County Council’s Developers Contributions Guidance using the following link:
http://www3.hants.gov.uk/education/school/school-places

It is not possible to advise on the detail of the works required to the school(s) at this stage, as feasibility studies and consultation must be undertaken to identify the best way of accommodating the children on site however, the contribution will be used to directly mitigate the impact of the development and any part of the contribution that is not utilised will be returned to the developer. As more detailed work is undertaken the County Council can provide a site specific estimate of costs. Financial contributions may change depending on the make-up and timing of the development.

In summary, the contribution towards the provision of a new primary school is necessary to accommodate the anticipated yield of pupils from this development. The contribution will be spent on the provision of this new primary school and therefore is directly related to the development. The level of contribution being sought is based on the number of children expected to be living on the development and the expected cost of accommodating these children at the school and therefore is fairly and reasonably related in scale and kind to the development. This information is supported by the County Council’s ‘Planning for School Places Guidance Document’ which sets out the methodology for assessing the impact of development on education infrastructure.

In the same way that there is a need to provide sufficient mainstream school places there is a need to provide Early Years places to accommodate the anticipated need for this type of places. Hampshire County Council is a commissioner of places but works with the market to ensure a sufficiency of Early Years places in an area. A development of 800 dwellings is likely to generate the need for 70 Early Years places. On that basis it is recommended that an area of land be set aside or 0.25ha for the market to build and run the Early Years provision for this development.

Recommendation

The County Council, as Local Education Authority, raises no objection to the planning application subject to:
The applicant entering into a section 106 agreement to secure a contribution of £5,308,821 towards the cost of the new primary school and £4,197,819 towards the cost of the expansion of Horndean Technology College in order to mitigate the impact of the development on educational infrastructure and ensure that sufficient school places are provided to accommodate the additional children expected to be generated by the development. Costs are based on 4Q2017 price base (BCIS All-in TPI Index 291). The contribution will be index linked to this base date until the contribution is paid.

Without the provision of a contribution towards the provision of additional school places the County Council, as Local Education Authority, would object to the proposal on the grounds that the impact on the existing infrastructure cannot be sufficiently mitigated and therefore the development is unacceptable in planning terms.

10/3/20

Thank you for consulting Hampshire County Council as Local Education Authority on the above planning application, which has been passed to me for comment.

The proposed development of 800 dwellings is expected to generate a total of 240 additional primary age children and 168 secondary age children. I understand that there are a number of one bedroomed dwellings proposed within the development which will lower this anticipated primary yield closer to a 1fe (210 place) primary school. My comments are, therefore, based on the provision of a 1fe primary school to serve the development. The calculation of the yield of pupils is based on a figure of 0.3 primary age children per new dwelling and 0.21 secondary age children which was derived by conducting demographic surveys of developments that have been completed within Hampshire and calculating the average number of primary and secondary age children on those developments.

The development site will be served by the provision of a new 1fe (210 place) primary school and Horndean Technology College. In order to meet this provision a site area of not less than 1.2ha, of useable area, is required to be transferred to Hampshire County Council at nil consideration together with a contribution towards the cost of the new 1fe primary school. However, it is anticipated that the District Council supports the County Council in setting aside a further 0.8 ha of land in case there is a need to expand the school in the future. During discussions the length of time that this additional land needs to be made available can be agreed.

The required primary contribution is £5,229,096 in line with Hampshire County Council’s Developer Contribution Guidance document. This figure is based on the cost of a new 1fe primary school. This figure is based on 4Q2018 price base (BCIS All-in TPI Index 322).

The development site is served by Horndean Technology College. This secondary school is full and forecast to remain so for the foreseeable future but is only full owing to out catchment recruitment. Over time the pupils from the proposed development will be able to access a place at Horndean Technology College and, therefore, I will not be seeking a contribution towards the expansion of the school.
For the avoidance of doubt I am assuming that a section 106 agreement will be set in place to ensure that the contribution requested is made available to the County Council to mitigate this development. I would ask that you confirm that this will be the position in respect of this development.

Details of the forecasting methodology used, along with the current pupil numbers at these schools can be found in Appendix A.

The County Council has used recent past projects to derive costs for the proposed new school – details and an explanation can be found in the County Council’s Developers Contributions Guidance using the following link: http://www3.hants.gov.uk/education/school/school-places

It is not possible to advise on the detail of the works required on site at this stage, as feasibility studies and consultation must be undertaken to identify the best way of accommodating the children on site, however, the contribution will be used to directly mitigate the impact of the development and any part of the contribution that is not utilised will be returned to the developer. As more detailed work is undertaken the County Council can provide a site specific estimate of costs. Financial contributions may change depending on the make-up and timing of the development, especially (but not exclusively) in regard to the site conditions.

In summary, the contribution towards the provision of a new primary school is necessary to accommodate the anticipated yield of pupils from this development. The contribution will be spent on the provision of this new primary school and therefore is directly related to the development. The level of contribution being sought is based on the number of children expected to be living on the development and the expected cost of accommodating these children at the school and therefore is fairly and reasonably related in scale and kind to the development. This information is supported by the County Council’s ‘Planning for School Places Guidance Document’ which sets out the methodology for assessing the impact of development on education infrastructure.

In the same way that there is a need to provide sufficient mainstream school places there is a need to provide Early Years places to accommodate the anticipated need for this type of places. Hampshire County Council is a commissioner of places but works with the market to ensure a sufficiency of Early Years places in an area. A development of 800 dwellings is likely to generate the need for 70 Early Years places. On that basis it is recommended that an area of land be set aside or 0.25ha for the market to build and run the Early Years provision for this development at the appropriate time.

Recommendation

The County Council, as Local Education Authority, raises no objection to the planning application subject to:
The applicant entering into a section 106 agreement to secure a contribution of £5,229,096 towards the cost of the new primary school in order to mitigate the impact of the development on educational infrastructure and ensure that sufficient school places are provided to accommodate the additional children expected to be generated by the development. Costs are based on 4Q2018 price base (BCIS All-in TPI Index 322). The contribution will be index linked to this base date until the contribution is paid.

Without the provision of a contribution towards the provision of additional school places the County Council, as Local Education Authority, would object to the proposal on the grounds that the impact on the existing infrastructure cannot be sufficiently mitigated and therefore the development is unacceptable in planning terms.

**Health & Safety Executive**

14/2/19


The Health and Safety Executive (HSE) is a statutory consultee for certain developments within the Consultation Distance of Major Hazard Sites/ pipelines. This consultation, which is for such a development and also within at least one Consultation Distance, has been considered using HSE’s planning advice web app, based on the details input on behalf of HSL.

HSE’s Advice: Advise Against. The assessment indicates that the risk of harm to people at the proposed development site is such that HSE’s advice is that there are sufficient reasons on safety grounds, for advising against the granting of planning permission in this case.

22/2/19

Following further information being provided to HSE by Leigh Abley, including an annotated site plan, please find attached HSE’s advice for the planning application 55562/005 - Land East of Horndean.

Please note that this advice letter supersedes the previous advice letter provided to you by Kate Wagner on the 14 February 2019 (Ref: HSL-190214105022-381).

HSE does not, not advise against the granting of planning permission in this case.
As this amendment is further technical information received from the applicant in respect of highways, biodiversity, drainage, and noise matters HSE do not have any comments to make.

However, please ensure that you continue to consult HSE on further matters relating to this planning application. Planning Authorities should use the Web App to consult HSE on certain developments including any which meet the following criteria, and which lie within the consultation distance (CD) of a major hazard site or major hazard pipeline.

- residential accommodation;
- more than 250m² of retail floor space;
- more than 500m² of office floor space;
- more than 750m² of floor space to be used for an industrial process;
- transport links;
- or which is otherwise likely to result in a material increase in the number of persons working within or visiting the notified area.

There are additional areas where HSE is a statutory consultee. For full details, please refer to annex 2 of HSE’s Land Use Planning Methodology:
www.hse.gov.uk/landuseplanning/methodology.htm

Thank you for your email regarding Amendment to Planning Application 55562/005 Development Land East of Horndean, Rowlands Castle Road, Horndean, Waterlooville. As this amendment is further technical information received from the applicant in respect of highways matters HSE do not have any comments to make.

However, please ensure that you continue to consult HSE on further matters relating to this planning application. Planning Authorities should use the Web App to consult HSE on certain developments including any which meet the following criteria, and which lie within the consultation distance (CD) of a major hazard site or major hazard pipeline.

- residential accommodation;
- more than 250m² of retail floor space;
- more than 500m² of office floor space;
- more than 750m² of floor space to be used for an industrial process;
- transport links;
- or which is otherwise likely to result in a material increase in the number of persons working within or visiting the notified area.

There are additional areas where HSE is a statutory consultee. For full details, please refer to annex 2 of HSE’s Land Use Planning Methodology:
www.hse.gov.uk/landuseplanning/methodology.htm
Thank you for the opportunity to comment on the above application. It seeks the permission for up to 800 dwellings

Site History

It should be noted that the site has Outline planning permission pursuant to application number 55562/001. The Highway Authority previously recommended no objection to that application subject to conditions and a S106 legal agreement securing the identified mitigation measures in the form of:

- A financial transport contribution of £1,981,000 to be used towards highway improvement measures, improvements to sustainable modes of transport, and other measures that provide direct benefit to the site.
- Implementation of off site highway works as shown in principle on drawings:
  - A081737_023 Rev F – Proposed Accesses off B2149 and Pyle Lane
  - A081737_024 Rev E - Proposed Accesses off Rowlands Castle Road
- Financial contribution to deliver the proposed signalised crossing points at Dell Piece East and B2149.
- To achieve the necessary speed reduction on Rowlands Castle Road to accommodate the required access visibility.
- Submit and implement a full Travel Plan, payment of the Travel Plan approval and monitoring fees, and provision of a surety mechanism to ensure implementation of the Travel Plan.
- A signalisation scheme to A3 (M) junction 2 which accommodates pedestrian and cycle movements across the junction from Dell Piece East to Dell Piece West.
- A pedestrian and cycle route to link all parcels with Rowlands Castle Road, to promote access to Rowlands Caste Rail Station (delivered through the internal layout of the site)
- A pedestrian route to land parcels accessed adjacent to Pyle Lane (delivered through the internal layout of the site)
Planning Policy

A number of relevant planning policy documents have been considered by the applicant within the TA. There is no narrative however regarding the specific allocation policies relevant to this site under Policy HN1. This should be included and commentary on how the applicant considered this site accords with this policy in transport terms should be provided.

Development Proposals

This revised application for the land seeks for the permission for the following scale of development:

- Up to 800 new homes
- 2.0ha of employment land (flexible between B1 and B2)
- Land for a new 2 form entry primary school
- A local centre incorporating retail and community facilities (flexible between A1,A2,A3,A4 and A5 uses)

The site is located to the east of Horndean and east of the A3(M) and is divided into two parcels situated both sides of the B2149. The site is allocated in East Hampshire’s adopted Local Plan under Policy HN1 and is allocated for mixed use in the form of circa 700 dwellings with a Care Village, 2 hectares of B2 and B1 use and a new primary school.

Accessibility

The existing pedestrian and cycling provisions in the vicinity of the site is limited due to the nature of the existing land use and current demand and need for pedestrian and cyclist connections to agricultural farm land.

A Non-Motorised User (NMU) audit should be undertaken by the applicant to establish suitable walking and cycling routes from the site to key facilities.

This should include routes to the nearest secondary school, Horndean Technical College. The NMU audit should also consider routes by external pupils travelling to the proposed on-site 2FE primary school. The applicant should contact Hampshire County Council’s Education department to establish where the catchment area for the school is forecast to be.

The proposed development is not considered to be easily accessible by public transport based on the proposals submitted within the Transport Assessment. The nearest bus stop is circa 15-minute walk from the commercial element of the site. The majority of the residential areas of the site are at least 20 minutes from the nearest bus stop. Existing bus services based on their current routing are not considered to be agreeable without further assessment work.
As part of the previous Outline application it was concluded that the development was not of a scale to support a fully commercial bus service. However, this revised application increases the level and alters the offer of development within the land area. Therefore, this matter should be fully revisited by the applicant in liaison with the bus providers to determine whether there are opportunities to provide additional or altered bus service provision which would reduce the reliance on the private car. Further comments are provided on this matter within this response.

The nearest railway station is Rowlands Castle and is over 3km south east of the application site. The rail station provides services to London Waterloo and Portsmouth Harbour hourly, save the peak times where two services per hour are provided. The station provides minimal cycle and car parking, four and 26 spaces respectively. The applicant has suggested that rail could be used as a multi-modal journey with cycling. The applicant should provide more information on a suitable cycle route from the site to the rail station and additional cycle parking for the highway authority to consider this as a realistic travel choice. This should be covered within the NMU audit.

**Baseline Conditions**

The applicant has undertaken ATC surveys to obtain the baseline conditions on the local road network. The surveys collected data over a 7 day period from the 27th June 2018 to the 3rd July 2018. Additional ATC surveys were undertaken from 30th September 2018 to the 6th October 2018 to compare results. As shown in Table 2.4 of the Transport Assessment the surveys are broadly similar and therefore the highway authority is satisfied that the June surveys can be used.

The applicant has stated that the ATC surveys identified peak hours of 07:30 – 08:30 and 17:00 – 18:00. It is noted that the identified AM peak hour differs from the previous application which was 08:00 – 09:00.

**Trip Generation**

The applicant has used vehicular trip rates which are in accordance with those previously agreed by the highway authority, for the previous Outline Application, for the residential and employment elements of this application. The highway authority is satisfied that these trip rates are still considered robust and therefore are acceptable. These are as set out below:

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This application proposes a 2FE school site, where as the previous application only provided a 1FE school, meaning external education trips will occur as set out in the Transport Assessment. TRICS has been used to establish a trip rate for the generation of trips from outside of the site to the school. It is not clear how the proportion of vehicle trips to the site have been identified. The level of anticipated vehicle trip movements should be based on local comparison sites. This information can be obtained from HCC’s School Travel Planning team. The proposed vehicle trip generation for the schools is therefore not agreed at this stage.

Additionally, the Transport Assessment does not include any trip generation for the proposed A3, A4 and A5 land uses. Further information should be provided by the applicant and evidence why all trips associated with these land uses will be internal to the site. It is noted that these land uses could range from independent take-aways/restaurants to large national companies which could contribute to external vehicular trips.

PIA

The applicant has included five years of recorded Personal Injury Accident data from May 2013 to April 2018 and this is considered acceptable to the Highway Authority, however the data cannot be assessed as it is not clear as to the study area which was included. The applicant should provide a plan showing the study area undertaken and the locations of the accidents identified.

Within the assessment a number of accident clusters identified at the following junctions:

• Havant Road/Dell Piece East Roundabout
• Havant Road/London Road/Blendworth Road Junction
• Northbound on-slip approach to Junction 2 A3 (M)
• Westbound approach to Junction 2 A3 (M)
• Southbound approach to Junction 2 of A3 (M)

The applicant has concluded that all accidents were due to driver error but has not established whether there are any patterns in relation to the errors being made which could therefore identify the need for accident remedial measures. The highway authority is monitoring the A3/B2149

Trip Assignment

The distribution of residential and employment trips generated by the proposed development has been forecast using Census 2011 Location of Usual Residence and Place of Work data and has used the Middle Super Output Area (MSOA) East Hampshire 016. Vehicular trips were then assigned to the various routes connecting the site to the identified workplace destinations. Assignment was based on the most likely or direct route.
Appendix G shows the traffic flow data, however there is no information regarding the destinations which would be trip attractors as explained above. The Highway Authority requests that this information is provided to ensure that a robust assessment has been used. It should be noted that the distribution varies from the previously consented Outline application, albeit it used 2001 Census data. A narrative to explain the observed differences between the census data sets and how this impacts on distribution would be beneficial.

The highway authority does not agree that the methodology used to calculate the education distribution is robust. The applicant should contact Hampshire County Council’s Education department to establish the likely catchment area for the proposed 2FE primary and update trip distribution accordingly.

*Future Year Scenario*

The applicant has suggested that a future year scenario of 2030 will be used due to the scale and build out time of the development. The Highway Authority is satisfied that a future year scenario of 2030 will capture the full impact of the proposals.

TEMPRO, an industry standard software tool, has been used to forecast the increase in the baseline vehicular trips on the local road network and the MSOA East Hampshire 016 has been used. The below growth factors have been derived.

These rates appear low for the number of forecast years and should be reviewed. The Highway Authority has interrogated TEMPRO and obtained higher growth rates. It should be noted that the previously agreed growth factors for 2014 to 2020 and to 2024 were considerably higher as set out below:

The applicant should provide commentary on Havant Borough Council’s Draft Local Plan 2036 which proposes a considerable allocation on the B2149 at the boundary with East Hampshire. This site is referred to under emerging policy KS5 Southleigh for an allocation of 2100 dwellings. Confirmation is therefore required that this and any other relevant emerging allocation is appropriately accounted for within the TEMPRO growth factors or propose alternative methods for how these emerging allocations are suitably accounted for and tested within the TA. The emerging East Hants Local Plan should also be reviewed and the TEMPRO growth factors should be senses checked against the emerging allocations with the area.

*Committed Development*

The applicant has included the following committed development traffic;

- Woodcroft Farm (APP/13/00804)
- Land East of Horndean (55562/0010 – the Care Village element only. The applicant suggests that Woodcroft Farm development traffic has been assigned using trip distribution figures used in this Transport Assessment which is not considered robust methodology. The flows should be added based on the agreed distribution of that application. In addition there are permitted applications within the Havant Borough Council area which should be considered. In particular those on Bartons Road which include:

- Land South of Bartons Road – APP/15/01435
- Land North of Bartons Road – APP/15/01386
- Colt International – APP/18/00244
- Eastleigh House - APP/16/01077

The applicant has mentioned Land South of Oaklands House 30016/018 which is not included because the site is built out. The highway authority is not satisfied that this is the case when the traffic surveys were done and the applicant should clarify on the occupation rates with the Local Planning Authority when the ATC surveys were undertaken.

Proposed Vehicular Access

Drawing VD18678/100-01 Rev E shows an overview of the proposed vehicular access to the site. Five vehicular accesses are proposed and a bus only access is proposed to the north via Rowlands Castle Road.

- Two priority junctions are proposed from Havant Road, both with right turn lanes as shown on drawings VD18678/100-04 Rev D and VD18678/100-06 Rev C

- A new four arm roundabout on Havant Road to provide access to development parcels to the east and west, as shown on drawing VD18678/100-05 Rev D

- Modifications to an existing four arm roundabout to add an additional arm for access to the employment land, as shown on drawing VD18678/100-03 Rev D
  - A new priority junction from Pyle Lane, as shown on drawing VD18678/100-05 Rev D

- A new access which is proposed to provide bus only and emergency access from Rowlands Castle Road, as shown on drawing VD18678/100-07 Rev B.

It is noted that the access strategy is broadly in line with the previous application, save for the new priority junction with right turn lane via the B2149 south of the main site access roundabout and therefore this planning response will only provide comment on this access.

Drawing VD17678/100-06 Rev C shows a new priority junction onto the B2149 served from a right turn lane. Speed surveys have been undertaken in the vicinity of the access with 85th%ile speeds recorded as 51.3mph, however visibility splays have only been shown to be 4.5m by 90m. As per Hampshire County Council Technical Guidance 3, visibility splays and the design of the junction should be based on the existing recorded speeds.
Forward Stopping Sight Distances should also be shown on the drawing, based on the recorded speeds, to ensure that sufficient forward visibility is provided for the right turn lane. It appears that a shared footway/cycleway is being provided which in principle is acceptable to the Highway Authority, however the new provision to the south does not look to tie in to any existing infrastructure.

An independent Stage One Road Safety Audit should be provided for the proposed highway works.

In addition to the vehicle access points there are proposals to reduce the speed limit to 30mph on Dell Piece East and Havant Road between a position south of the priority access junction to the Dell Piece east/Havant Road roundabout. In addition it is proposed to reduce the speed limit on Dell Piece East to 40mph to complement the pedestrian/cycle crossing works at the A3 (M) junction 2 roundabout.

No measures are proposed other than the new access arrangements and provision of footway cycleway to support the change in speed limit as agreed within the previous application where traffic calming measures were recommended under condition. The TA proposed the introduction of gateway features at the start of the speed limit change and make no reference to additional measures that may be necessary.

The Highway Authority would require the applicant to commit to providing additional traffic calming measures as required to ensure that speeds are in accordance with the revised speed limit proposals. This could be covered by condition as with the previous application.

*Proposed Sustainable Transport Improvements*

A number of improvements are proposed to aid with pedestrian and cycle access to the site. These are as follows:

- A new shared use footway/cycleway on the southern/western side of the B2149 del Piece East/Havant Road along the length of the site frontage. This is proposed in the form of a 3m wide facility with a 1m landscape strip.

- Toucan crossing facilities where the footway/cycleway meetings Junction 2 of the A2 (M)

- Footway provision on the north/eastern side of Havant Road across the site frontage

- Two new signal controlled crossing facilities on Havant Road:
  - 250m north of the proposed new access roundabout
  - Immediately south of the proposed access roundabout – this proposed crossing point is an additional crossing point as per the agreed highway works with the previous application. The applicant should provide clarification regarding the need of the crossing point and the likely pedestrian and cycling demand for the highway authority to review.
• Pedestrian access to the existing footway on the southern side of Rowlands Castle Road.

_Junction Assessment_

The following assumptions were applied to the site access distribution for junction modelling purposes;

- Employment to be accessed via Access A only;
- Primary School to be accessed via Access D only;
- 240 dwellings to be accessed via Access E;
- 104 dwellings to be accessed via Access C; and
- 228 dwellings to be accessed via Accesses B and D with a 50/50 split

The junctions were assessed against a number of scenarios which include:

• 2018 Surveyed base
• 2030 Base + Committed Developments; and
• 2030 Base + Committed Developments + Proposed Development

The following junctions were assessed

• Havant Road/Rowlands Castle Road (all scenarios)
• Havant Road/Site Access north (with development scenarios); and
• Havant Road/Site Access south (with development scenarios);
• Dell Piece East/Havant Road roundabout (all scenarios)
• Havant Road/South Site Access roundabout (with development scenario)
• A3 (M) Junction 2 (2018 survey and 2030 base scenarios)

The junction modelling cannot be assessed by the Highway Authority until the vehicle trip generation and distribution for the site has been agreed.

It is also noted that trip assignment, albeit not agreed, shows a significant number of two-way trips travelling south on the B2149, 85 and 92 in the AM and PM peaks respectively. The applicant should consider further assessment of the local road network. The highway authority is happy to agree the study area once trip assignment is agreed.

_Bus Service Improvements_

The applicant has proposed sustainable transport mitigation by way of providing provisions for a bus route through their site, including a bus gate to served via Rowlands Castle Road. However, no information has been provided by the applicant to suggest that a bus will be re-routed through the site.

The applicant should open dialogue with the bus providers in the area to establish if they would be open to either re-routing an existing service or providing a new service which enters the site.
Should the bus service providers be open to this, a patronage test should be provided by the applicant to ensure that the bus service would be self-sufficient without the need for bus subsidy from Hampshire County Council.

**Travel Plan**

This Framework Travel Plan (FTP) has been assessed using Hampshire County Council’s (HCC’s) evaluation criteria for the assessment of travel plans – “A guide to development related travel plans”. Whilst the quality of this FTP is generally good, it still requires some amendments before it can be approved.

**Background**

A policy section should be added to the FTP which includes summaries of relevant national and local policy including, but not limited to: the National Planning Policy Framework (2018), East Hampshire District Council’s car parking Supplementary Planning Document, HCC’s “A Guide to Development Related Travel Plans”, and Manual for Streets.

This section should also reference the developer’s policies on sustainable travel. If the developer does not have a policy on sustainable travel, a statement of support for the aims of the Travel Plan from a senior member of Paragraph 2.2 should include an objective to reduce the number of Single Occupancy Vehicle (SOV) journeys to and from the site.

Consultation and Partnerships The FTP should contain evidence of preliminary liaisons with local cycle shops and public transport operators to scope the possibility of arranging for discounts on equipment and services respectively. These communications can then form the basis for further negotiations between these companies and the Site-Wide Travel Plan Manager (SWTPM).

Furthermore, section 5 should include a commitment for the TPC to work with other developments in the area which are carrying out their own Travel Plans. Section 9 should include a commitment for the School Travel Plan Champion to liaise with HCC’s school travel plan team.

**Site Audit**

Section 3 should include photos of the site access points (A and B) as they are currently.

Table 3.1 shows distances to local facilities, but it is unclear if these distances are “as the crow flies”, or actual walking distances. Paragraph 3.20 refers to the “Star B” service. This should be corrected to the “Star 8” service.

Paragraph 3.24 notes that there are four cycle parking spaces at Rowlands Castle station. Further information should be provided regarding this provision; are these covered, and what is the type of cycle parking?
Occupier Travel Plans should commit to outlining delivery movements and operational hours.

**Targets**

Paragraph 5.6 states a reduction of SOV journeys by 5%. HCC would typically expect a reduction of around 10% unless there are other substantial considerations which mean that this is unrealistic.

A table of targets should be included in section 5 under “Indicative Targets”; please see the example table below. A percentage decrease or increase should be given to each travel mode. The baseline for these targets can be arrived at by using the MSOA data from the 2011 census or existing survey results for similar developments in the area.

**Table 1 - Example table for displaying modal split targets**

An explanation of how these targets have been developed should be included as well.

**Measures**

Further clarification should be provided in paragraph 6.5 regarding the extent of the shared pedestrian/cycle facility along Havant Road. A commitment should be included for the residential cycle parking to be easily accessible from the highway and in a secure location. It is noted that paragraph 7.3 states that the price and nature of the voucher will be agreed via a Section 106 Agreement. However, we would anticipate that a cost estimate is included in the FTP; residential travel vouchers are typically estimated to cost around £25-50 per household and have an uptake rate of around 50%.

Paragraphs 7.4 and 7.5 which refer to car sharing could also include a commitment to promote pre-existing online facilities such as liftshare.com.

There are a number of additional measures for the residential portion of the development which should be considered for inclusion in the FTP:

- Promotion of free health/exercise apps for mobile phone,
- Formation of a Bicycle Users Group (BUG),
- Use of social media to promote the Travel Plan and disseminate sustainable travel information.

There are also a number of additional measures for the employment portions of the development which should be considered for inclusion in the FTP:

- Showers and lockers on site,
- Umbrella loan schemes for pedestrians,
- A guaranteed ride home in emergencies for those car sharing or travelling by public transport,
- Including the FTP as an item on team meeting agendas,
• Use of social media to promote the Travel Plan and disseminate sustainable travel information.

An action plan should be included in the appendix which details each measure to be conducted as part of the site-wide Travel Plan (including resources to be allocated to the SWTPM role). The action plan should be similar in layout to the example table below.

Table 2 - Example Action Plan

Roles and Responsibilities

Paragraphs 5.24 and 5.25 should be amended to state that the Occupier TPC should be appointed 3 months prior to occupation, and the full Travel plan should be submitted and approved prior to occupation.

Monitoring

Monitoring should continue for a minimum of 5 years after full occupation; section 10 should be updated to include this commitment. Section 10 should also commit the monitoring reports to containing a summary of measures enacted over the previous year, and the resources expended on the Travel Plan over the same period.

A minimum 35% response rate must be attained in order for travel questionnaire surveys to be considered statistically significant. If this cannot be achieved, then discussions should be had with HCC regarding carrying out TRICS SAM or ATC surveys.

There are currently no measures in place to encourage members of staff or residents to complete a questionnaire survey. Entry into a prize draw could be offered to those who complete a survey, although it should be noted that the prize should not be travel-related (e.g., bus tickets, cycle vouchers, etc). Businesses could mandate that staff complete the survey, rather than offer entry into a prize draw.

A sample questionnaire survey should be provided in the appendices. An example residential questionnaire survey has been attached which could also be adapted to serve a commercial site.

Delivery and Enforcement

There should be a reference in the document to a means for enforcing the FTP. Typically, this is accomplished through a Section 106 agreement. A commitment to pay HCC’s monitoring and approval fees should be included in Section 10.

Sanctions should be in place in the event of non-compliance with the terms of the FTP.
Conclusion

The FTP will require further amendments as set out above before it can be considered acceptable for submission in conjunction with the proposed site.

Recommendation

Additional information is required in order to fully assess the impact of the proposed development. This information should address the following matters as set out in detail within our response:

• Trip distribution
• NMU Audit
• Trip generation
• PIA study area and further commentary
• Background traffic growth (TEMPRO)
• Committed development assumptions
• Sensitivity testing taking into consideration emerging local plans
• Updated junction assessment
• Further information for improved bus services
• Updates to the Framework Travel Plan

If the Planning Authority are minded to determine this application prior to the submission of the requested additional information please contact the highway authority for my recommendation

7/11/19

Thank you for the opportunity to comment on the above outline planning application. The Highway Authority have previously responded as per the report on 14th February 2019 and requested the following information from the applicant.

• Trip distribution
• NMU Audit
• Trip generation
• PIA study area and further commentary
• Background traffic growth (TEMPRO)
• Committed development assumptions
• Sensitivity testing taking into consideration emerging local plans
• Updated junction assessment
• Further information for improved bus services
• Updates to the Framework Travel Plan
This response will be based on the Transport Assessment, the Technical Note submitted to the Local Planning Authority on 2\textsuperscript{nd} August 2019, the updated Crossing Point and Bus Service Note submitted on the 25\textsuperscript{th} August and the Rowlands Castle Double Mini-Roundabout Junction Capacity Assessment Noe submitted on the 22\textsuperscript{nd} October 2019.

**Non-Motorised User Audit**

The applicant has undertaken a WCHAR (Walking, Cycling and Horse-riding Assessment and Review) to assess the existing infrastructure from the site to nearby facilities. The identified routes are shown in Figure 3 of the WCHAR and proposes two routes to Horndean Technology College and one to Rowlands Castle rail station.

Route One originates from the Havant Road/Dell Piece East roundabout and travels west over the A3(M) junction to Catherington Lane and to the School. The WCHAR states that there are deficiencies in the current provision and that it would not be suitable for the proposed increase in pedestrian and cycling movements associated from the proposed development.

The proposed improvements to the A3(M) junction, as shown on drawing VD18678/100-02 Rev D, contains improved pedestrian and cycling provision which is acceptable in principle to the Highway Authority. However, the proposed cycleway provision does not continue along Dell Piece West as highlighted within the applicant’s WCHAR marked Route 3. The existing provision is not suitable for cycle use and will need to be upgraded as part of these proposals to ensure that a continuous safe cycle route is provided to link the development to facilities to the west of the site and provide a safe cycle route to Horndean Technical College. These are site specific works and therefore should be delivered as part of the S278 works at the A3(M) junction.

In addition to the above works, this will result in pedestrians and cyclists travelling to Horndean Technology College along Merchistoun Road and Catherington Lane which does not have cycle provision along this route. The previous application secured a financial contribution through the signed Section 106 legal agreement to improve cycle facilities along this route and therefore to provide a continuous cycle and pedestrian route from the site to Horndean Technology College.

The Local Planning Authority now includes the provision of cycle infrastructure other than site-specific requirements through their CIL 123 list and therefore the Highway Authority will not be able to secure this financial contribution through S106 contribution. It is important that the Local Planning Authority use the CIL money, collected as part of the application, on the delivery of these cycle routes to provide sustainable transport infrastructure and reduce the reliance of private car use.
The WCHAR report includes an assessment of the route to the nearest rail station in Rowlands Castle and is labelled Route 3 within the report. It sets out that there is lack of pedestrian provision and there is no dedicated cycle provision. The distance is over 4km away, which is beyond recommended walking distances, however it is the nearest Rail provision and therefore it is envisaged that there will be an additional demand for rail travel from the proposed development site. It is therefore necessary to ensure that multi-modal sustainable travel options are secured from the site to make the route more attractive for cyclists and reduce the reliance on private car travel to Rowlands Castle Rail Station, which could be in the form of, but not limited to, additional signage, directional fingerposts and cycle parking infrastructure. Route 3 should also be the promoted route through the Full Travel Plan. The Highway Authority is satisfied that a financial contribution is secured through a Section 106 legal agreement to ensure the delivery of this infrastructure.

PIA

The applicant has submitted the PIA study area which is shown in Figure 2 and is considered acceptable. Commentary has been provided on the identified five accident clusters at the following locations;

- Havant Road/Dell Piece East Roundabout;
- Havant Road/London Road/Blendworth Road Junction;
- Northbound on-slip approach to Junction 2 A3 (M);
- Westbound approach to Junction 2 A3 (M); and
- Southbound approach to Junction 2 of A3 (M)

Havant Road/Dell Piece East roundabout

Five recorded accidents occurred at this location, two serious and three slight. The two serious accidents occurred on motorbikes and were attributed to driver behaviour. The remaining three slight accidents occurred in cars and are attributed to driver error. It should be noted that all accidents occurred at different locations on the junction and therefore there is not an apparent trend.

Havant Road/London Road/Blendworth Road junction

Four recorded accidents occurred at this junction, two serious and two slight. The accidents are all recorded in different locations and therefore there is not apparent trend at this junction.

Junction 2 A3(M)

Ten slight accidents have occurred at this junction and the commentary within the Transport Addendum suggests a minor accident issue which is attributed to inappropriate speeds around the gyratory. The applicant proposes to provide improvements at this junction in the form of signalisation and therefore would alter the speeds of vehicles. A Stage One Road Safety Audit has been submitted in association with the improvements and has not raised this trend within the document.
The Highway Authority is satisfied that the recorded PIA data does not show any trends which will be exacerbated by this development or will be mitigated against through highway work improvements.

*Trip Generation*

The Highway Authority previously accepted the residential and employment trip rates and requested further information on the vehicle trips associated with the proposed education and A3/A4 and A5 land uses.

The applicant has provided further information regarding the education vehicle trip rate. Using data from HCC education, it has been calculated that for a 1.5FE school, is forecast to result in 57 two-way vehicular trips in the AM peak and 5 two way vehicular trips in the PM peak. The Highway Authority is satisfied that the methodology is robust. The applicant has stated that as the Transport Assessment considered external trip rates, of 76 and 13 two-way vehicular trips in the AM and PM peak respectively, these rates have been used to provide a more robust assessment. This is considered acceptable, however should the primary school increase to 2FE, the Highway Authority request that the Local Planning Authority reconsult the Highway Authority.

The Highway Authority previously raised concerns over the ancillary local centre uses which contains A3/A4 and A5 land uses as these land uses could be occupied by large national fast food companies which would compromise the ancillary element and would attract external trips. The Highway Authority requested further information to evidence why all trips associated with these land uses will be internal to the site. The applicant has stated that the trips will all be internal due to Local Centre use, rather than the proposed land uses being an external trip attractor.

The Highway Authority is satisfied that the Local Centre uses will be internal to the site and pass-by trips and any associated external vehicular trips will have a negligible impact on the surround road network. The Highway Authority recommends that the Local Planning Authority satisfy themselves that the land uses are only used for Local Centre uses and not open A3/A4 and A5 uses.

*Trip Distribution*

The applicant has clarified the methodology used estimate the distribution of vehicle trips derived from the proposed development and how it differs from the previous application 55562/001 which had planning permission.

The distribution of residential and employment trips generated by the proposed development has been forecast using Census 2011 Location of Usual Residence and Place of Work data and has used the Middle Super Output Area (MSOA) East Hampshire 016. Vehicular trips were then assigned to the various routes connecting the site to the identified workplace destinations using further MSOA’s rather than a higher level, which the previous application used. Assignment was based on the most likely or direct route.
HCC Education has confirmed that the likely catchment of the proposed on-site 1.5FE primary school will be from the east of the A3(M) and therefore all of external education trips have been assigned from Havant Road. It should be noted that this is based on providing a 1.5FE school and should this increase, the Highway Authority request that the Local Planning Authority reconsulted on the proposals.

Having regard to the above, the Highway Authority is satisfied that the vehicle trip distribution is considered acceptable.

*Committed Development and TEMPRO*

The Highway Authority requested that the applicant provide further details on why the TEMPRO factors were low when comparing with the previous application. The applicant has removed 700 residential housing growth, allocated Land East of Horndean HN1 site, from TEMPRO to ensure no double counting trips and has resulted in a lower background than previously agreed. The TEMPRO figures for 2018-2030 presented within the Transport Assessment of 1.0619 and 1.0568 in the AM and PM peaks respectively. Having a regard to the above, the Highway Authority is satisfied that the TEMPRO growth rates are acceptable.

The Highway Authority requested that the applicant consider the impact of the following committed development;

- Land South of Bartons Road – APP/15/01435
- Land North of Bartons Road – APP/15/01386
- Colt International – APP/18/00244
- Eastleigh House – APP/16/01077
- Land South of Oaklands House 30016/018

The applicant has stated that due to the minimal increase in trips from the sites on the local highway network within the scope of this assessment, it considers they are already captured within the TEMPRO growth along Havant Road.

The committed development traffic increases the movements on Havant Road by 40 and 49 two-way trips in the AM and PM peaks respectively. The TEMPRO growth adds 88 and 90 two-way trips in the AM and PM peaks respectively. The applicant has stated that including the committed development on top of TEMPRO would result in double counting as the committed development trips are including within TEMPRO. The Highway Authority is satisfied with this methodology.

*Emerging Local Plan*

The applicant has stated that Havant Local Plan has included HN1 within the modelling assessment and therefore should not be for this development to include sites which are not committed and the full extent of the impact is not known. The Highway Authority accepts this position and no further assessment is required.
Access Strategy

The access strategy is broadly in line with the previous permitted application, save for the new priority junction with right turn lane via the B2149 south of the main site access roundabout.

A Stage One Road Safety Audit has been submitted to the Highway Authority for the proposed highway works and have not highlighted any fundamental road safety concerns. The junctions will need to be delivered through a Section 278 legal agreement and the works will be subject to Hampshire County Council’s S278 design check process. The works should be secured through a Section 106 legal agreement and the Highway Authority will discuss appropriate trigger points with the Local Planning Authority and the applicant to implement the various accesses as shown on the access strategy plan VD18678/100-01 Rev E.

Proposed Access off Rowlands Castle Road

The access onto Rowlands Castle Road is proposed to be a bus only access. Drawing VD18678/100-07 Rev B shows a bellmouth junction onto Rowlands Castle Road from the site. The Highway Authority has concerns over the current proposals as the drawing does not show how the junction will limit access to only buses.

It should be noted that the Highway Authority will not accept any bus gate/bollard provision. A mechanism will be required which will prohibit all motor vehicles apart from buses.

The proposals also include a link to the existing footway provision which is considered acceptable. The WCHAR report has recommended that Rowlands Castle Road be appropriate for cycle use to access Rowlands Castle Rail Station and further design work should be undertaken to promote this access for cyclists.

It is agreed that the provision of a bus only access is secured through planning condition or Section 106 legal agreement and further work can be undertaken post planning if this application is approved. The applicant and Local Planning Authority should note that the access as shown on the aforementioned drawing could be different and therefore may impact other consultees.

Proposed Accesses from B2149

Drawings VD18678/100-04, 05 and 06 show the three direct accesses to the proposed development site on the B2149, comprised of two bellmouth junctions with associated right turn lanes and a 40 metre ICD roundabout which provides access to land parcels on both sides on the B2149.

The junctions have been designed in accordance with the recorded speeds along the B2149 and the Highway Authority is satisfied that the proposed visibility splays accord with Hampshire County Council’s TG3 and can be achieved within highway land or land within the application’s red line boundary.
The drawings include a 3 metre-wide shared footway/cycleway along the western side of the carriageway and links in to the proposed A3(M) works which delivers a continual provision and is considered acceptable.

The works will be secured through planning condition or Section 106 legal agreement and will be delivered through a Section 278 legal agreement.

**Proposed Access from Pyle Lane**

VD18678/100-05 Rev E shows a proposed bellmouth access from Pyle Lane in the form of a bellmouth access and is considered suitable for the size of the land parcel. The drawing shows footway provision at the access point, however there is no existing provision on Pyle Lane and the drawing does not show the proposals to tie in. The Highway Authority recommend providing an internal pedestrian and cycling link to access onto the B2149 and should be provided during the reserved matters stage for this land parcel.

In addition to the above, the visibility splays have been shown as 4.5 metres by 90 metres and have not been based on speed surveys. Should the application be approved, the applicant should undertake speed surveys in this location which could reduce tree loss to accommodate the northern splay.

The works will be secured through planning condition or Section 106 legal agreement and will be delivered through a Section 278 legal agreement.

**Proposed works to the Dell Piece East/Havant Road Roundabout**

Access to the employment area at the north of the proposed development is proposed by modifying the existing roundabout to increase the size and introduce an additional arm to serve the site as shown on drawing VD18678/100-03 Rev E, as previously agreed as part of the previous application. The proposals include pedestrian and cycling infrastructure and should be explored further through the S278 design check process to ensure full connectivity is provided. The works will have an impact on the Brethrens Meeting Hall access and the Local Planning Authority should consult this third party.

The works will be secured through planning condition or Section 106 legal agreement and will be delivered through a Section 278 legal agreement.

**Proposed works to Junction 2 A3(M)**

The works, as shown in drawing VD18678/100-02 Rev D, were considered in detail at length during the previous permitted application and were considered acceptable and the proposal have not been altered. The works include providing a shared 3 metre wide footway/cycleway round the southern edge of the northern over bridge and controlled crossing points for pedestrians and cyclists. The applicant have discussed the proposals with Highways England who have raised no objection to the works.
These works should include the provision of a shared 3 metre footway/cycleway from the tie in at Dell Piece West to the existing provision at the B2149/Lakesmere Road roundabout. This should include a safety margin between the carriageway and the shared facilities.

The applicant should engage with both Highway Authority’s, HCC and Highways England, at an early stage to ensure this infrastructure is not delayed. The works will be secured through planning condition or Section 106 legal agreement and will be delivered through a Section 278 legal agreement.

**TRO**

The proposed works require a TRO to reduce the existing speed limit as shown on drawing VD18678/100-06 Rev E, although this does not show the full extent of the speed limit change and should be discussed further with the Highway Authority should planning permission be issued. The applicant should be made aware that this is a separate process outside of planning and is not a guaranteed outcome and it is advised to start this process early. The Highway Authority is satisfied to secure the provision and TRO cost through a Section 106 legal agreement.

**Junction Assessment**

The applicant has undertaken junction modelling of the following junctions in the agreed assessment scenarios of;

- 2018 Surveyed flows
- 2030 Base + Committed Developments
- 2030 Base + Committed Developments + Proposed Development

**Junctions:**

- Havant Road/ Rowlands Castle Road
- Havant Road/ Site Access north
- Havant Road/ Site Access south
- Dell Piece East/ Havant Road roundabout
- Havant Road/ South Site Access roundabout
- A3 (M) Junction 2

The above junctions have been modelled using industry standard computer modelling programs ARCADY and PICADY computer modelling program. This software provides Mean Maximum Queue (MMQ) and Ratio of Flow to Capacity (RFC) outputs which assess the demand against the theoretical capacity of a junction, an RFC value of 1.00 reflects a demand equal to the capacity of the junction approach, although a result over 0.85 is an indication that the junction is operating above optimum capacity.
LinSig software has also been used of the A3(M) junction. LinSig provides Mean Maximum Queue (PCU), Delay Per PCU (S) and Degree of Saturation (DoS) outputs which assess the demand against the theoretical capacity of a junction. A DoS percentage of 90% suggests that the junction is operating at near full capacity while 100% shows full capacity, anything above this suggests that the junction is operating above its theoretical capacity.

The following assumptions have been made;

- Employment to be accessed via Access A only;
- Primary school to be accessed via Access D only;
- 240 dwellings to be accessed via Access E (this includes north-eastern arm of proposed roundabout as well as dwellings accessed from Pyle Lane and represents 30% of residential traffic);
- 104 dwellings to be accessed via Access C (13% of the residential traffic);
- 228 dwellings accessed from Access B and the same number accessed from Access D. This represents 50% - 50% split between these two access points which will be connected internally within the site.

Should this application be approved, and the subsequent Reserved Matters applications alter access scenarios set out above, the Highway Authority reserve the right to request a reassessment of the junctions.

The modelling assessment has been validated using queue length surveys undertaken in 2018 for the A3(M) and Dell Piece East/Havant Road junctions. It should also be noted the Highway Authority have accepted an increase in trips through the previous application on the local road network and the below junctions were subject to assessment in the expired planning permission 55562/001. The modelling was accepted, and a mitigation package was agreed where required, which has not been altered by this applicant.

**Havant Road/ Rowlands Castle Road**

This junction has been assessed using PICADY and in the 2030 baseline + committed + development scenario and shows that the junction will operate within theoretical capacity with the highest RFC of 0.41, found on the Rowlands Castle Road arm in the PM peak.

**Dell Piece East/Havant Road Roundabout**

This existing layout of the junction has been assessed using ARCADY and in the 2030 baseline + committed scenario and shows that the junction will operate close to theoretical capacity. The proposed development will provide a junction improvement to this roundabout, including a new arm to access the employment element of the development. The improvements will be in line with the previously accepted improvement scheme accepted as part of the previous application.
The improvement scheme will be in the form of a 52 metre ICD roundabout with an additional arm to access the employment element of the proposed development, as shown on drawing VD18678/100-03 Rev D. The modelling results shows that all arms will operate within theoretical capacity in the future year scenario with the highest RFC value of 0.73 on the Havant Road south arm in the AM peak and is therefore considered acceptable to the Highway Authority.

Havant Road/ Site Access north
This junction has been assessed using PICA DY and in the 2030 baseline + committed + development scenario and shows that the junction will operate within theoretical capacity with the highest RFC of 0.22, found on the Site Access arm in the AM peak.

Havant Road/Site access roundabout
This junction has been assessed using ARCADY and in the 2030 baseline + committed + development scenario and shows that the junction will operate within theoretical capacity with the highest RFC of 0.70, found on the Havant Road north arm in the PM peak.

Havant Road/ Site Access south
This junction has been assessed using PICADY and in the 2030 baseline + committed + development scenario and shows that the junction will operate within theoretical capacity with the highest RFC of 0.09, found on the Site Access arm in the PM peak.

Junction 2 A3(M)
The applicant proposes to improve the pedestrian and cycling infrastructure as per the previous application to ensure safe and suitable connectivity from the site to facilities and amenities to the west of the A3 (M). The improvements will include signalisation of the junction and LINSIG has been used to assess the future operation of the junction.

The highest DoS found through the junction is the Dell Piece East Ahead Left lane at 90.70%. It is noted that Highways England have accepted the proposals and the modelling however it is not known if the applicant has altered the modelling based on comments made by HE. The Highway Authority is satisfied that the junction signal timings can be agreed post planning to ensure the scheme fully provides for both vehicular and non-vehicular users and should be secured through planning condition or Section 106 obligation.

This infrastructure should be provided prior to occupation and the applicant should liaise with Hampshire County Council and Highways England as the highway authorities at an early stage to ensure there is no delay in providing this necessary infrastructure.
Rowlands Castle Double Mini-Roundabouts

The Highway Authority recommended that the applicant should consider further assessment of these junctions due to the proposed traffic flows associated with this development and the applicant has submitted a Technical Note to address this and assumes the same modelling assumptions as the previous transport work and geometry from planning application 30016/018. The table below shows the difference in trips through the junction from the previous application to the proposed development.

<table>
<thead>
<tr>
<th></th>
<th>AM Two-Way</th>
<th>PM Two-Way</th>
</tr>
</thead>
<tbody>
<tr>
<td>55562/001 - Previous</td>
<td>14</td>
<td>17</td>
</tr>
<tr>
<td>55562/005 - Current</td>
<td>85</td>
<td>92</td>
</tr>
</tbody>
</table>

The applicant has modelled the junction using PICADY and the results are shown in Table 1. The outputs suggest that the associated development traffic will result in reducing the theoretical capacity of the junction when compared to the future year scenario without development traffic. The highest RFC value is 0.99 on the Whichers Gate Road arm of the junction therefore the additional trips from this development removes any spare capacity in the future year scenario.

The increase in vehicle trips through this junction will result in a significant impact and therefore it is necessary for the applicant to provide mitigation. It is known that the junctions will experience increased delay and queuing and a significant impact on the theoretical capacity through the transport work of the emerging Havant Borough Council Local Plan. This has an identified improvement scheme in this location in the form of a signalised junction.

The Highway Authority recommends that a financial contribution is provided by the application and secured through a Section 106 legal agreement to mitigate the impact on this junction.

Crossing Points

The Highway Authority is satisfied that there will be pedestrian demand for controlled crossing points on Dell Piece East and on Havant Road, however it is not clear on the most appropriate form or locations. The applicant is willing to provide up to three controlled crossing points, one on Dell Piece East and two on the B2149 and this will be secured through a Section 106 legal agreement and will require an appropriate plan showing an indicative location. The final form and locations should be agreed at the appropriate reserved matters stage when the internal layout of the land parcels is known to ensure the crossings are appropriately located.

Bus Service

The applicant has stated that First Group would be willing to divert the number 8 service twice an hour to provide a bus every half an hour through the proposed development site. An email has been submitted by First Group confirming this arrangement.
The proposed route, as shown in Figure 1 of the Crossing and bus service note, shows that bus entering the site from Rowlands Castle Road from the north and traveling south through the site, accessing the western parcel via the proposed site access roundabout and then egress northbound onto the B2149 via the proposed priority junction.

In addition to the above, high quality bus infrastructure should be provided when the residential parcels come forward. This should include bus shelters and real time information technology as a minimum requirement.

The provision of this bus service agreement should be secured through appropriate planning condition to ensure it’s delivery.

**Framework Travel Plan**

The Framework Travel Plan is now agreed and should be secured through a Section 106 legal agreement along with an appropriate bond which should be calculated by the applicant using the agreed measures within the Framework Travel Plan. This should also include the bus service measures which should be calculated as set out above.

A Full Travel Plan should be produced prior to the 1st occupation of the development and a Full Travel Plan Bond secured. In addition to this, an approval fee and monitoring fees will also be secured through the S106 legal agreement.

**Internal Layout**

It is understood that there is concern regarding the internal road in the vicinity of the Primary School site and

The Highway Authority would recommend that the applicant offers the internal residential roads for adoption through a Section 38 legal agreement and is happy to assist and work with the applicant from an early stage.

Should the applicant wish to keep the internal layout private, it would be advisable that the roads and footways are designed to Hampshire County Council’s best practice as set out in

https://www.hants.gov.uk/transport/developers/constructionstandards,

and that an appropriate Private Management Plan is put in place to deal with any future issues. The applicant should also be made aware of the Advance Payments Code (APC) that will be required by the Highway Authority.

**Mitigation**

**Section 278 works**
- Junction 2 A3(M) signalised crossings and cycle scheme which connects to existing provision at the Lakesmere Road/B2149 junction, as shown indicatively on drawing VD18678/100-02 Rev D
  1. Improvements to the Havant Road/Dell Piece Roundabout as shown indicatively on drawing VD18678/100-03 Rev E and associated footway/cycleway works
  2. Three new access onto B2149 as shown indicatively on drawing VD18678/100-04 Rev E, VD18678/100-05 Rev E, VD18678/100-06 Rev E and associated footway/cycleway works
  3. New access onto Pyle Lane as shown indicatively on drawing VD18678/100-05 Rev E
  4. New bus only access onto Rowlands Castle Road, as shown indicatively on drawing VD18678/100-07 Rev B and associated footway works

Section 106 obligations

5. £482,000 towards Rowlands Castle Double Mini roundabout improvement scheme
6. £201,000 towards multi-modal access to Rowlands Castle Rail Station
7. £6,000 TRO contribution
8. Provision of up to three controlled crossing points
9. Provision of bus infrastructure
10. Full Travel Plan, including approval fees, monitoring fees and Travel Plan Bond

The level of Transport Contribution relates directly to the impact of the proposed development. The additional vehicle trips will cause harm by worsening local congestion; this contribution is required to provide more sustainable travel choices and to manage growing travel demands in a sustainable way. In addition, the contribution will comply with the requirements of the East Hampshire District Local Plan Review policies.

The proposed Transport Contribution is in line with the three tests as set out in the Community Infrastructure Levy (CIL) 122 regulation. The contribution is necessary to make the development acceptable in planning terms because it will help fund local measures to accommodate the additional demands generated by the development. The contribution is directly related to the site as it will help provide local improvements that link the site to the wider transport network. The contribution is fairly and reasonably related in scale and kind to the development site.

CIL requirements

It should be made clear the previous application and Section 106 legal agreement were secured prior to the Local Planning Authority introducing the Community Infrastructure Levy

The Local Planning Authority should ensure that the previous Section 106 contributions which were focussed on transport infrastructure are allocated to the following schemes and deliver them in a timely manner to reduce the reliance on private car use and sustainable transport infrastructure is delivered to allow the additional pedestrian and cycling movements wider connectivity to facilities within Horndean.
11. A cycle route between Snells Corner and Horndean War Memorial (Portsmouth Road/London Street junction)
12. Upgrade of Pelican Crossing to Toucan crossing at Bartons Cross, Horndean
13. Cycle route on Catherington Lane
14. Cycle route on Merchistoun Road, Horndean
15. Up-grading the footpath/cycle routes from the site to Havant Thicket

Recommendation

Having regard to the above the Highway Authority raise no objection to the planning application subject to the securing the mitigation package as outlined above. The Highway Authority will discuss with the Local Planning Authority and the applicant with regards to trigger points for the implementation of the proposed mitigation and infrastructure.

Conditions

CONSTRUCTION TRAFFIC MANAGEMENT PLAN

No development shall start on site until a construction method statement has been submitted to and approved in writing by the Planning Authority, which shall include:
(a) A programme of and phasing of demolition (if any) and construction work;
(b) The provision of long term facilities for contractor parking;
(c) The arrangements for deliveries associated with all construction works, including routing and access plans;
(d) Methods and phasing of construction works;
(e) Access and egress for plant and machinery;
(f) Protection of pedestrian routes during construction;
(g) Location of temporary site buildings, compounds, construction material, and plant storage areas;
Demolition and construction work shall only take place in accordance with the approved method statement.

BUS SERVICE AGREEMENT

No occupation of the 100th dwelling shall occur until a bus service agreement has been submitted to and approved in writing by the Planning Authority which shall include the provision to operate a bus service which serves the site every 30 minutes between 0630 and 1900 on Monday to Saturdays.

I hope the above is clear however should you require any further clarity, please contact Tom Fisher on the above details.
24/3/20

Thank you for consulting the Highway Authority on the above application. It does not appear that anything has altered with regard to highway matters since the previous recommendation on 7th November 2019 and therefore no further comments are required. If this is not the case, please let the Highway Authority know so they can respond appropriately.

Highways England

21/12/18

Thank you for your email of 14 December 2018 regarding the above application.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. In the case of this development proposal, our interest is in the A3(M), specific to that development A3(M) Junction 2.

We have reviewed supporting documents available on the planning website, however it is unclear whether full Transport Assessment has been carried out as the only information available is contained within Environmental Statement. You may also be aware that we commented on the previous Outline planning application, planning ref: 5562/001 on 31 March 2015 (under Highways Agency name) and we directed a condition to be attached to any grant of planning permission. It is unclear if this has been considered in the current proposals set out in 55562/005.

We would ask that the authority does not determine the application (other than a refusal) ahead of us receiving and responding to the required information. In the event that the authority wishes to permit the application before this point, we would ask the authority to inform us so that we can provide a substantive response based the position as known at that time. Please note that this is not a formal response.

We also would like to request a meeting with applicant (already requested when we responded to the EIA scoping opinion in October 2018) so we can discuss impacts of the proposal on A3(M) and specifically A3(M) J2. Please e-mail me possible dates for the meeting to planningse@highwaysengland.co.uk

19/9/19

Thank you for your email dated 5 August 2019 regarding the above application.
Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

In the case of this development proposal, our interest is in the A3(M).

This development involves work to the public highway (strategic road network and local road network) that can only be undertaken within the scope of a legal Agreement or Agreements between the applicant and Highways England (as the strategic highway company appointed by the Secretary of State for Transport) and, as necessary and appropriate, the Local Highway Authority. Planning permission in itself does not permit these works.

It is the applicant’s responsibility to ensure that before commencement of any works to the public highway, any necessary Agreements under the Highways Act 1980 are also obtained (and at no cost to Highways England). Works to the highway will normally require an agreement or agreements, under Section 278 of the Highways Act, with Highways England and the Local Highway Authority.

Advice on this matter can be obtained from the:

Spatial Planning Team,

Highways England,
Bridge House,
Walnut Tree Close,
Guildford,
Surrey,
GU1 4LZ.
Email planningse@highwaysengland.co.uk
Tel 0300 123 5000.

Having examined the above application we have no objection to this application. We advise that the reasons behind this no objection are that the site already has planning consent for 700 houses (planning application reference number: 55562/001) so the assessment was of the impact of the additional 100 houses proposed by this application, and that the assessment of A3(M) Junction 2 identified that it would continue to operate within capacity with the trip generation predicted from the additional 100 houses. However, we request that the following condition (this has been agreed with the applicant) is attached to any planning permission you chose to give for this proposal.

Sustainable Northern Link at A3(M) Junction 2:
Prior to first occupation of development hereby permitted, the proposed northern route around the A3(M) Junction 2 roundabout (as per drawing VD18678-100-02D) should be constructed and open to the public to ensure there is a sustainable route to Horndean at all times from the development.

Reason: To maintain the continued safety of the A3(M) and all of its users, and to ensure a sustainable route to Horndean at all times from the development.

We request to be consulted on any reserved matters, this would include the potential acoustic bund to the south of the site.

4/1/19

Thank you for your e-mail of 2 January (from Lauren Tinker) advising where full TA is located on your planning website. We have now reviewed this document and have the following comments:

A3(M) Junction 2 proposed improvement drawing – the one submitted with planning application 55562/005 appears to be identical to the one previously submitted as part of the original 700 dwelling application. However it is our understanding that the proposed improvement would take a different form to that of the original application. Therefore we request confirmation regarding what the form of the proposed improvement will take and if different, please provide relevant drawing.

A3(M) Junction 2 – please provide modelling files (as opposed to just outputs) for ARCADY/Junctions 9 and LinSig files.

Please provide Road Safety Audit brief for the proposed A3(M) Junction 2 improvement as per DMRB HD 19/15 ‘Road Safety Audit’

In our previous response we also requested to provide confirmation whether planning condition directed by us (as Highways Agency) for Outline Planning application (5562/001) has been considered in the current proposals. We still require this information.

We further asked if the meeting with applicant could be arranged to discuss impact of the proposal on the A3(M) J2. We feel that it would be beneficial for this to be arranged. Please e-mail me possible dates for the meeting to planningse@highwaysengland.co.uk

20/9/19

Having examined the above application we have no objection to this application. We advise that the reasons behind this no objection are that the site already has planning consent for 700 houses (planning application reference number: 55562/001) so the assessment was of the impact of the additional 100 houses proposed by this application, and that the assessment of A3(M) Junction 2 identified that it would continue to operate within capacity with the trip generation predicted from the additional 100 houses. However, we request that the following condition (this has been agreed with the applicant) is attached to any planning permission you chose to give for this proposal.

Sustainable Northern Link at A3(M) Junction 2:
Prior to first occupation of development hereby permitted, the proposed northern route around the A3(M) Junction 2 roundabout (as per drawing VD18678-100-02D) should be constructed and open to the public to ensure there is a sustainable route to Horndean at all times from the development.

Reason: To maintain the continued safety of the A3(M) and all of its users, and to ensure a sustainable route to Horndean at all times from the development.

We request to be consulted on any reserved matters, this would include the potential acoustic bund to the south of the site.

18/3/20

Thank you for your letter dated 4 March 2020 regarding the above application, which advises us that the amendments are “Further information received relating to Highways matters”.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

In the case of this development proposal, our interest is in the A3(M).

Having examined the submitted documents for this amendment to the above planning application we consider that this is unlikely to have a significant impact to the safe and efficient operation of the SRN, in this case the A3(M). Therefore, we have no additional comments over and above what we provided in our response dated 19 September 2019 which is attached for convenience. However, we would like to reiterate that our no objection to this planning application is subject to a condition requiring the provision of the proposed northern route around the A3(M) junction 2 roundabout.

Horndean Parish Council

15/1/19

OBJECTION for the following reason:

The increase in housing density, height of proposed buildings and the urbanisation of the section of Havant Road which overlooks the SDNPA is contrary to CP29 Design. This is also contrary to the Horndean Village Design Statement. Further, the layout of the retail (serviced from the front), education and community facilities is contrary to CP29 Design.
The following comments raise concerns which should be addressed before the Application is determined. Consultation with both Parishes and residents would be welcomed.

Design and Access Statement:

Pg 2. The community facilities are classed only as D2. This is restrictive and D1 classification should be added. The HPC Design Brief V7.5 applies

Pg 10. There is no mention of the Horndean Conservation Area in the commentary on Horndean.

Pg 16. The Traffic Assessment is considered to be inadequate. It is important to note that many people will travel to Havant via the B2149 rather than the A3(M), therefore the TA and road improvements must take account of this to avoid major disruption in the area.

Pg 20. As raised under "Access" the hedgerow along the western side of the B2149 is missing from the Constraints plan, as is the hedgerow along the southern edge of the road - Dell Piece West. It is not desirable to urbanise this area any more than is essential.

Pg 24 and Pg 25 It is important to note that none of the Design Development included input from HPC or residents which is contrary to best practice for public engagement.

Pg 28. A two-form entry primary school is listed. That is what is required with the increase in housing numbers. Please confirm that this will be provided.

The hedging along the Havant Road should be retained to maintain the character of the area. No houses should front on to Havant Road.

The Community building, retail provision and school are situated near the main entrance to the site so that each facility faces a busy road and they are separated by that road which will carry a lot of traffic. This is likely to reduce the co-operative use of car parking and introduces the need for safe crossing points to be constructed.

The next section is entitled "Character"

Pg 33. It is difficult to identify the area described as "south-facing public space...........

Why is the Retail provision to be serviced from the front? Service access should be from the rear or it will interfere with the enjoyment and safety of that frontage.

The small drop-off zone for the school appears to be entirely inadequate and will lead to street parking and congestion. The trip estimate in the Transport Assessment associated with the schools is, in our experience, far too low and unrealistic.

The public realm vision is unrealistic - it will be dominated by vehicles - parents taking children to and from school, delivery lorries, visitors to the community centre and "passing trade" which by its very nature will be via a vehicle.
Pg 34. The Linear Park (following the line of the gas pipe) on Plot C is crossed by two roads - what provision is made for users of the Park to cross these in order to ensure it is "a vibrant area for pedestrian movement" and not a series of disconnected spaces? The B2149 separates the two parts of the Linear Park i.e. area C from area B but a crossing is to be provided in a suitable location. A NEAP is mentioned. The play and leisure facilities detailed in the extant S106 are not mentioned.

Pg 35/36/37 The three neighbourhoods raise concerns:

a) Horndean Park and Havant Road - the urbanisation of Havant Road is not welcome, nor is it appropriate opposite the SDNPA. The rural street-scene should be preserved. Horndean is considered to be a semi-rural settlement and loss of this should be avoided. It is difficult to see how "building fronting onto it will make it more attractive"

b) Rowlands Castle - why has this name been applied to area B? The village two miles along the B2149 might find it confusing - as will the residents of Horndean! It is suggested that this neighbourhood will benefit from "Soft landscaping and integrated street planting". Perhaps this could be applied to the other two neighbourhoods rather than an urban landscape.

Pg 38. The allotments have been moved and there does not appear to be any road access to them or any car parking for allotment holders. Further, the area allocated is only .36ha - previously 0.75ha. The extant permission is for 60 1/2 size allotments which cannot be provided in 0.36ha.

Further there is no mention of the Allotment buildings which were to be provided. Is this due to them being situated in a no-build zone?

The football pitch appears to be squeezed into the land allocated with little provision for spectators. There must be sufficient area for spectators. There must be provision for use of the school pitch by the Community outside School hours.

Trees covered by TPO's and which are significant and important to the character of area should be retained. No building should take place within the tree canopy or root area. The tree assessment covers all of these aspects and should be utilised and enforced.

Pg 40/41 The GI is welcomed

Pg 45. Phasing - the Commercial element is now in Phase 3 raising concerns that occupiers will not be employed in the commercial area but work outside of Horndean. The Commercial element should be provided much earlier in the development.

The Framework Travel Plan is over optimistic in terms of travel times and out of date in terms of the facilities quoted and missed out.
**13/8/19**

**OBJECTION** and the following points are made:-

1. HPC has not changed its original objection to the application and the Applicant should respond to the points that have been raised.

2. That HPC request an urgent meeting with the Applicant to discuss concerns.

3. That HPC and EHDC query with Hampshire County Council the change in requirements put forward by Children’s Services particularly in view of the fact that one of the suggested uses for part of the new Community Building is that of Early Years Provision.

4. The Applicant is aware that one of the cornerstones of the development of this site is that the character of the Havant Rd should not be changed. The urbanisation of the Havant Rd as set out in paragraph 2.8.9 of Appendix A! Of the Technical Note Response to HCC comments part 1 produced by Vectos for the Applicant is unacceptable.

**17/3/20**

**OBJECTION.** Notwithstanding what is set out in the Technical Design Response by Terence O’Rouke dated February 2020 and uploaded to the website on 3rd March 2020. Our previous comments and objections still apply.

**Natural England**

**30/1/19**

Planning consultation: Outline (with reserved matters) demolition of existing buildings and the residential-led (C3) mixed-use development of the site with up to 800 dwellings, up to 2ha of employment land (B1 & B2), a Local Centre (including: local retail (food & non-food A1); financial and professional services (A2); restaurants etc. Location: Development Land East of Horndean, Rowlands Castle Road, Horndean, Waterlooville

Thank you for your consultation on the above dated 14 December 2018 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Objection: Further information required to determine impacts on designated sites Solent International sites - Water quality and water resources and efficiency.
There are existing high levels of nitrogen and phosphorus input to the water environment in the Solent with evidence that these nutrients are causing eutrophication at internationally designated sites. An Integrated Water Management Study for South Hampshire was commissioned by the Partnership for Urban South Hampshire (PUSH) Authorities to examine the delivery of development growth in relation to legislative and government policy requirements for designated sites and wider biodiversity. This work has identified that there is uncertainty as to whether housing development in the later stages of the plan period would require mitigation.

In light of this uncertainty and for confidence that the development will be deliverable, Natural England recommends that the proposals achieve nutrient neutrality.

The application is supported by information for a habitat regulations assessment (EPR November 2018) includes a nutrient budget calculation which calculates the development will produce an annual nitrogen contribution of 50.6 kg. It concludes the development will be nitrogen neutral subject to adoption of the higher water efficiency standard of 110L and provision of surface water attenuation features including creation of at least 920m2 of wetland habitat. It is Natural England’s advice that design information for the proposed wetland and Sustainable Urban Drainage System (SUDs) as well as detailed mitigation management evidence including a costed nutrient management plan with respect to the above proposed mitigation measures will need to be provided prior to any permission and its implementation and ongoing maintenance secured by an appropriately worded planning condition(s) attached to any permission.

Please note that recent case law (‘Sweetman II’) outlines that mitigation measures should not be assessed through a Habitats Regulations Assessment (HRA) to ‘screen out’ impacts at the stage of considering Likely Significant Effects (LSE) rather avoidance/mitigation measures should be considered through an Appropriate Assessment. Therefore where impacts are identified as having a LSE, the HRA will need to move on to the Appropriate Assessment stage where avoidance/mitigation measures can be fully assessed. You may also want to seek your own legal advice on any implications of this recent ruling for your decisions.

Natural England advises that it is a matter for your Authority to decide whether an appropriate assessment of this proposal is necessary in light of this ruling. In accordance with the Conservation of Habitats & Species Regulations 2017, Natural England must be consulted on any appropriate assessment your Authority may decide to make. You may also want to seek your own legal advice on any implications of this recent ruling for your decisions.

**Ancient woodland: Objection further information required**

The proposals result of the loss of 800m2 of woodland within Soakfield Row to the north of the site, much of this woodland supports lowland mixed deciduous priority woodland habitat as listed under section 41 of the Natural Environment and Rural Communities Act 2006. Botanical surveys undertaken in 2014 recorded 15 ancient woodland indicators qualifying this site as ancient seminatural woodland, an irreplaceable habitat (WYG Horndean Woodland Botanical Report Final October 2014). Current Natural England standing advice on ancient
woodland and paragraph 175c of the National Planning Policy Framework outlines that development should be refused if it will result in the loss or deterioration of ancient woodland, ancient trees and veteran trees unless: there’s a suitable compensation strategy in place or there are wholly exceptional reasons.

Natural England has concerns about the current routing of the access road which will result in 800m² being lost and irreversibly bisect the woodland. Natural England recommends further options for rerouting the access road are explored to avoid the ancient woodland, possible options include relocating the access road to the north boundary of this parcel on to Rowlands Castle Road or from the south west corner from Dell Piece East roundabout. A sound justification and comprehensive compensation package will be required where avoidance is not possible.

Section 5.1 of Technical Appendix F.3 – Habitats and Vegetation (EPR November 2018) lists various measures for enhancement including a woodland management plan for the retained areas of woodland and transplanting the soils from the area of woodland to be lost to the access road.

However it is Natural England’s opinion that this does not constitute sufficient mitigation or compensation for the area of ancient woodland to be lost to the development or for residual losses and also does not address the potential for replanting the previously felled area of woodland at the western end of Soakfield Row.

In our view a more comprehensive compensation package will need to be agreed if the requirements for biodiversity enhancement as set out in National Planning Policy Framework paragraphs 8, 118, 170, 174 and 175d are to be met. Further, you should be aware that Section 40 of the Natural Environment and Rural Communities Act (2006) provides a duty to conserve and enhance biodiversity stating that, ‘Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity’. Section 40(3) also states that ‘conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat’. Biodiversity 2020: A strategy for England’s wildlife and ecosystem services and Making Space for Nature (2010) also provide strong drivers for the inclusion of biodiversity enhancements through the planning process.

Should your authority consider that there are wholly exceptional circumstances that would justify losses to the ancient woodland then additional habitat biodiversity compensation measures should be secured from the proposals. We would recommend that this is achieved through direct woodland creation, or alternatively a financial contribution secured by a S106 that is in line with the requirements of the Dorset Biodiversity Compensation Framework, or similar mechanism such as that used by the Environment Bank. The agreed level of funding should be used to support projects that facilitate the management, or creation of new or existing areas of lowland mixed deciduous woodland within the Borough. This could be discussed with the council’s retained ecologist as to how this might be achieved. Natural England would also be happy to discuss with the applicant through our Discretionary Advice Service.
Furthermore the mitigation proposals include recreational access to the retained woodlands across the site, Natural England has concerns that the associated footfall may degrade the remaining priority woodland habitat. To offset any adverse impacts it is advised that a woodland management plan is developed to avoid deterioration of the ancient semi-natural and lowland mixed deciduous woodland habitat.

Consideration should be given to appropriate siting of footpaths and exclusion of access from more diverse or sensitive areas, measures for monitoring should also be put in place. A woodland management plan should be submitted to and approved by the HCC Ecologist, any management plan and associated funding should be secured in perpetuity (normally 80 years).

**Bechstein’s bats – Objection further information required**

The application site is in close proximity to the ancient Forest of Bere landscape where Bechstein’s bats are found in internationally important numbers. The Environmental Statement identifies that there are Bechstein’s bat maternity roosts within the woodland parcels in the south and west of the site.

Natural England notes from ES chapter 7 (Terrence O’Rourke December 2018) that the woodlands to the west and south of the site are to be retained along with the area of pasture woodland supporting maternity roosts with a 25m bat habitat buffer zone connecting the woodlands. Natural England welcomes these measures, however has some concerns that the proposed layout does not adequately address enhancement of ecological connectivity with respect to Bechstein’s bats in line with Local Plan allocation policy HN1.

The illustrative master plan shows that the hedgerow connecting the wood pasture area and the woodland to south will be bisected by a road to a residential block in the south western corner (Phase 3). This hedgerow is a known commuting route for Bechstein’s bats identified in Technical Appendix F.6 Bats (EPR November 2018).

Natural England also notes that the size of this residential area has been increased from that permissioned in the previous outline application (55562/001). In line with the requirements of local plan policy HN1, Natural England expects the proposals to demonstrate enhanced ecological connectivity. Relocating development from this more sensitive area would further help buffer the Bechstein’s bat habitat, creating multi-functional open space here including woodland planting / natural regeneration, would preserve the existing hedgerow and provide connectivity within the wider landscape to Hazelton Common Local Nature Reserve.

Natural England would be happy to discuss how these elements could be better incorporated into the proposed layout directly with the applicant through our Discretionary Advice Service. Hazelton Common LNR: Potential impacts from increased recreational pressure – No Objection further information required
The proposals are likely to significantly increase the recreational pressure and associated site management costs of nearby Hazelton Common Local Nature Reserve. Natural England notes and welcomes the developer’s intention to provide a financial contribution towards access management and enhancement of footpaths within the reserve (Chapter 7 Ecology section 7.104 Terence O’Rourke Ltd December 2018). The appropriate level of contribution should be agreed in liaison with Horndean Parish Council and secured in perpetuity by section 106 agreement.

Provided the an appropriate financial contribution is agreed and secured, no further consultation with Natural England on this aspect of the proposal will be required.

Other advice

In addition, Natural England would advise on the following issues.

Construction Environmental Management Plan
Natural England welcomes the submitted Construction Environmental Management Plan (CEMP) this should be approved in writing by the Hampshire County Council (HCC) ecologist that identifies the steps and procedures that will be implemented to avoid or mitigate constructional impacts on species and habitats. The CEMP should address the following impacts:
• Storage of construction materials/chemicals and equipment;
• Dust suppression
• Chemical and/or fuel run-off from construction into nearby watercourse(s)
• Waste disposal
• Noise/visual/vibrational impacts on bats
• Visual screening
• Lighting impacts on bats

The approved CEMP should be secured via an appropriately worded condition attached to any planning consent and shall be adhered to at all times, unless otherwise first agreed in writing with the Local Planning Authority.

Biodiversity Mitigation and Enhancement

Natural England recommends that the application is supported by a Biodiversity Mitigation and Enhancement Plan (BMEP), or equivalent, that has been agreed by a Hampshire County Council (HCC) Ecologist. This will ensure the proposal meets the requirements of Natural England’s standing advice and the additional requirements for biodiversity enhancement and net gain as set out in National Planning Policy Framework paragraphs 8, 170, 174 and 175d.
We would recommend that a BMEP is agreed with the HCC Ecologist to ensure that any measures identified within the report, and any further measures as necessary, are secured and implemented with any planning approval. Consideration should be given to other developments proposed in the locality, particularly Havant Thicket in this instance, to ensure the biodiversity mitigation and enhancement measures are addressed strategically and consider the continued ecological function of the area. Further opportunities for enhancement might include:

- Creating multi-functional greenspace to enhance ecological connectivity with respect to Bechstein’s bats
- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Installation of bee bricks on south-facing walls
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.
- Creation of new species rich grasslands on road verges and amenity areas. The stripping of topsoil to reduce fertility prior to appropriate seeding has been demonstrated to produce attractive biodiverse grass verges that have significantly lower annual maintenance costs than the more typical improved amenity verges.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees and or providing gardens with native trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Please note that provided the HCC Ecologists are satisfied with the submitted BMEP and the full implementation of the plan is secured by any permission then no further consultation with Natural England on this aspect of the proposal is required. In the event that a BMEP cannot be agreed with the applicant then Natural England should be re-consulted on the proposals so that we can reconsider our advice.
Protected species

We have not assessed this application and associated documents for impacts on protected species.

Natural England has published Standing Advice on protected species. The Standing Advice includes a habitat decision tree which provides advice to planners on deciding if there is a ‘reasonable likelihood’ of protected species being present. It also provides detailed advice on the protected species most often affected by development, including flow charts for individual species to enable an assessment to be made of a protected species survey and mitigation strategy.

You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

If you have any specific questions on aspects that are not covered by our Standing Advice for European Protected Species or have difficulty in applying it to this application please contact us with details at consultations@naturalengland.org.uk.

Protected Landscapes

The proposed development is for a site within or close to a nationally designated landscape namely South Downs National Park. Natural England advises that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below.

Your decision should be guided by paragraph 172 of the National Planning Policy Framework which gives the highest status of protection for the ‘landscape and scenic beauty’ of AONBs and National Parks. For major development proposals paragraph 172 sets out criteria to determine whether the development should exceptionally be permitted within the designated landscape.

Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies.

The landscape advisor/planner for the National Park will be best placed to provide you with detailed advice about this development proposal. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the park’s management plan, will be a valuable contribution to the planning decision. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape’s sensitivity to this type of development and its capacity to accommodate the proposed development.
The statutory purposes of the National Park are to conserve and enhance the natural beauty, wildlife and cultural heritage of the park; and to promote opportunities for the understanding and The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence is needed (which is the developer’s responsibility) or may be granted enjoyment of the special qualities of the park by the public. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm those statutory purposes.

Relevant to this is the duty on public bodies to ‘have regard’ for those statutory purposes in carrying out their functions (section 11 A(2) of the National Parks and Access to the Countryside Act 1949 (as amended)). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Should the developer wish to discuss the detail of measures to mitigate the effects described above with Natural England, we recommend that they seek advice through our Discretionary Advice Service.

20/9/19

Amendment Details:

Further technical information received from the applicant in respect of highways, biodiversity, drainage, and noise matters

Thank you for your consultation on the above dated 05 August 2019 and apologies for the delay in our response.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**Solent International sites - Water quality and water resources and efficiency.**

Natural England notes the new nutrient budget provided in support of the application which in part follows technical advice provided by Natural England in June 2019. However, the submitted nutrient budget has not included the recommended 10% buffer as set out in the aforementioned advice. A buffer of a minimum of 10% is in our view required for the competent authority to be assured that the scheme will not lead to additional nutrient loads to the Solent international sites. On this basis we recommend that the N budget is resubmitted with the necessary buffer, along with any additional nutrient mitigation measures, such as the previously proposed wetland, needed to ensure N neutrality (including buffer). If a wetland is to be used as mitigation then, as stated in our previous response, further details of the design of the proposed wetland and Sustainable Urban Drainage System (SUDs) should be provided.
Any permission must ensure the necessary mitigation measures, including the increased water efficiency standard of 110 l, is appropriately secured by any permission.

Please note that recent case law (‘Sweetman II’) outlines that mitigation measures should not be assessed through a Habitats Regulations Assessment (HRA) to ‘screen out’ impacts at the stage of considering Likely Significant Effects (LSE) rather avoidance/mitigation measures should be considered through an Appropriate Assessment. Therefore where impacts are identified as having a LSE, the HRA will need to move on to the Appropriate Assessment stage where avoidance/mitigation measures can be fully assessed. You may also want to seek your own legal advice on any implications of this recent ruling for your decisions.

Natural England advises that it is a matter for your Authority to decide whether an appropriate assessment of this proposal is necessary in light of this ruling. In accordance with the Conservation of Habitats & Species Regulations 2017, Natural England must be consulted on any appropriate assessment your Authority may decide to make.

**Ancient woodland**

Natural England welcomes the more detailed analysis provided in relation to the alternatives considered and area of ancient woodland at Soakfield Row that would be unavoidably lost to the proposals. The submitted assessment now identifies a loss of 473m² (as opposed to 800m²). The acceptability of the loss of ancient woodland and bisecting of the woodland strip by the access road should be considered in light of paragraph 175c of the National Planning Policy Framework which outlines that development should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

Regarding the compensation strategy, Natural England notes and welcomes the proposals for translocation of woodland soils and planting of 0.71 hectares of new deciduous woodland, representing a 15:1 replanting ratio. The 15:1 ratio is however low and Natural England would recommend that this is complemented with additional and extensive native tree planting throughout the development, including within both greenspace and the provision of street and garden trees.

**Bechstein’s bats**

Natural England notes that no substantive changes are proposed in light of our previous comments.

We also note that the Hampshire County Council Ecologist engaged in advising on the implications of the scheme for Bechstein’s bat are stated as satisfied with the proposals. However, Natural England remains concerned that the proposals will not achieve the aim of achieving an enhancement of ecological connectivity with respect to Bechstein’s bats in line Local Plan allocation policy HN1. Rather the scheme will result in the known Bechstein’s bat commuting route along the hedgerow connecting the wood pasture area and the woodland to south being bisected by a new road to a residential block in the south western corner (Phase
The ES notes at paragraph 7.36 that:

“The strengthened bat dispersal corridors will, however, be breached in two locations, through Soakfield Row and to the south of the pasture woodland in the southern parcel, to provide vehicular access to residential areas. In the absence of mitigation, these breaches may discourage continued use of flight corridors, particularly by Bechstein’s bats, which are sensitive to barrier effects. This habitat fragmentation could accordingly cause the abandonment of particular commuting routes and subsequently isolated roost locations, potentially resulting in a large impact and a very substantial, significant adverse effect at the national level”.

The bisecting of an important Bechstein’s bat commuting routes by the new road and through the if residential areas on either side of the commuting route, in a locality already compromised by the motorway and the adjacent proposed residential areas, cannot represent an enhancement of ecological connectivity as require by local plan policy HN1. Rather, the scheme has simply sort to minimise the potential adverse impacts on ecological connectivity, as far as is possible given the current layout and scale of the proposals.

Natural England therefore maintains its advise that the scheme should be seeking to enhance ecological connectivity by linking the existing blocks of woodland that support roosting and foraging Bechstein’s bats by additional substantive blocks of woodland located between the new development and the motorway.

The mitigation measures proposed to remove the potential adverse effect on commuting Bechstein’s bats is set out at ES paragraph 7.116:

“The fragmentation of identified Bechstein’s bats’ flight corridors by access roads will be mitigated by the development of a detailed mitigation design, including the minimisation of carriageway widths and the provision of ‘hop-overs’, through the retention of existing road-adjacent trees or transplantation of large (semi mature or mature) trees, to reduce barrier effects and guide commuting bats above traffic. A monitoring programme, including further phases of radiotracking, will be undertaken to evaluate the effectiveness of the mitigation and inform proposals for remediation and refinement where necessary. No significant residual adverse effects are anticipated”.

It seems unlikely that measures outlined at 7.116 will be capable of fully removing the barrier effect and light pollution associated with the use of the new road. Given Bechstein’s bats sensitivity to light there must also be some doubt as to whether a 25m corridor of new habitat through a new urban to maintain the bats flight paths to foraging areas from the known roost. Examples of where Bechstein’s bat have been demonstrated to have utilised similar habitat corridors through an urban area would be helpful in determining the likelihood of success of the current proposals.
Where there is uncertainty in the likely success of mitigation measures then further consideration should be given to additional measures to ensure the long term viability of the Bechstein’s roosts in the vicinity of the development. Natural England therefore advises that if your authority is minded to grant the scheme in its current layout then further measures are secured to enhance bat foraging, roosting and commuting features within the wider locality. This might be achieved through a secured funding contribution to wider bat enhancement works. The value of such a fund should be calculated through the preparation of a costed bat habitat enhancement scheme for Holt and Havant Thicket.

Natural England would be happy to comment on any enhancement scheme in due course.

**Biodiversity Mitigation and Enhancement**

Natural England welcomes the commitment to submit at the subsequent planning stages a site-wide Ecological Mitigation and Enhancement Strategy that will set out ecological mitigation, compensation and biodiversity enhancement measures for the scheme. Natural England recommends that the provision and implementation of an agreed Ecological Mitigation and Enhancement Strategy is secured as a condition of any permission.

If you have any queries relating to the advice in this letter please contact me on 02080 261472.

Please consult us again once the information requested above, has been provided

20/4/20

Thank you for your consultation on the above dated 04 March 2020 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**Deterioration of the water environment**

The application is supported a revised nutrient budget which sets out the proposals will result in a negative nitrogen contribution of -55.5 Kg/N/year. Please note that the Solent nutrient methodology as recently been revised, we recommend the nitrogen budget is rerun using the new methodology attached. Natural England advises the waste water issue should be examined via an appropriate assessment and the open space provision as mitigation land should be secured in perpetuity by appropriately worded condition or other legal mechanism as appropriate. In accordance with the Conservation of Habitats & Species Regulations 2017, Natural England must be consulted on any appropriate assessment your Authority may decide to make.

Soakfield Row SINC
Natural England notes the Technical Response (TOR February 2020) which states that there is limited evidence to support this as being ancient woodland. Natural England advises that insufficient information has been provided to support this conclusion. The Ancient Woodland Inventory currently only maps ancient woodland above 2ha in size, work is underway to review the inventory and map all ancient woodland above 0.25ha in size but this project has not yet been completed. The presence of 15 ancient woodland indicators and its inclusion on Epoch 1 mapping warrants further investigation, the Ancient Woodland Inventory handbook (May 2018) provides a methodology for reviewing historical maps and records. Natural England recommends this guidance is followed and historical tithe maps and associated tithe apportionment records are checked as a minimum to assess the ancient woodland status of Soakfield Row, this information has yet to be provided.

Without this information Natural England advises that it must be assumed that the Soakfield Row SINC is in fact an area of ancient woodland and the application treated accordingly. In such circumstances the planning authority will need to ensure any permission meets the policy tests set out in the National Planning Policy Framework paragraph 175c. That is, Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. (NPPF para 175 (c)).

The applicant has provided additional information relating to the “wholly exceptional reasons” that would justify damage to Soakfield Row SINC, which rely entirely on the scale of the development. However, the scale of the development is not exceptional on a national scale and nor would the retention of the woodland prevent a significant development at this location.

The justification provided within the Post Application Technical Response is constrained by the Local Plan Policy requirements, most notably the need to avoid a direct access from Rowlands Castle Road. It is however unclear whether the local plan policy considerations took account of the need for a “wholly exceptional reason” that would warrant damage to an area of ancient woodland. If it did not then your authority should be satisfied that the avoidance of a connection to Rowlands Castle Road outweighs the national policy considerations related to ancient woodlands. Here it should be noted that measures could also be put in place to mitigate at least some of the disadvantages. For example, the use of Pyle Lane as a rat run could be prevented by restricting its use to residents only, or preventing access on to Rowlands Way. Similarly, connectivity for pedestrians and cyclists might be provided via Pyle Lane, or via a new cycle way through Soakfield Row SINC, which would be far less damaging than the current proposals.
If your authority is satisfied that there are wholly exceptional reasons that would justify the losses to Soakfield Row SINC then a suitable compensation strategy needs to be agreed and secured. Natural England welcomes the provision of 0.71 ha of new deciduous woodland, plus additional native tree planting across the development, which equates to a compensation ratio for woodland of approximately 15:1 (based on a loss of 470 m²). The proposed Landscape and Environmental Management Strategy should be submitted to, approved by a Hampshire County Council ecologist and secured by appropriate worded condition.

It would however be helpful to clarify how the woodland compensation package has been derived. In our view the area of replacement woodland should, as an absolute minimum, equate to the requirements set out in the Defra Biodiversity Net Gain Metric 2.0 for the loss of a good quality lowland mixed deciduous woodland. It must be stressed that this minimum compensation requirement relates to non-ancient woodland, for the loss of an area of ancient woodland a significantly larger area of like for like replacement woodland should be provided. If following this assessment additional woodland compensation is considered necessary and greater onsite provision cannot be provided than sufficient funding should be agreed with your authority to enable the creation woodland elsewhere to cover any shortfall. Such a contribution could be used for woodland creation and or measures to further the conservation of the East Hampshire population of Bechstein’s bat (see further comments below).

**Bechstein’s bats**

We note the Technical response considers the submitted mitigation strategy to be robust. Natural England disagrees with this assessment. It must be stressed that Bechstein’s bat is considered one of the UK’s rarest bats, with the East Hampshire population likely to be relatively small and isolated and therefore more vulnerable in comparison to other UK populations. The species is included on the EU Habitats Directive Annex II & IV. The European Union include it on its Red List, as a Vulnerable species, while the IUCN classify it as a Near Threatened species globally with a declining trend. In light of the conservation importance of the species any development within the core sustenance zones of known maternity roosts should aim to achieve an enhancement for the local bat population.

The proposals place a large urban development directly between known maternity roost and important foraging areas to the south at Havant Thicket. The scheme will also result in the loss of a significant part of the non woodland foraging area for the local population with no proposed compensation. The principle bat corridor from the maternity to Havant Thicket is bisected by an access road. Further, the retained areas of woodlands and new habitat corridors will be subject to significant levels of new recreational access from the proposed development. The impacts of recreational pressure in relation to Bechstein’s bat have been described in the “Trowbridge Recreation Strategy and Visitor Surveys” (Footprint Ecology Nov 2018).
Potential impacts include damage to woodland structure through tramping, disturbance, cat predation, fly tipping, removal of deadwood etc. Natural England would also draw your authority’s attention to the recently agreed “Trowbridge Bat Mitigation Strategy SPD” Feb 2020 which provides robust mitigation and compensation requirements for a range of key bat species, including Bechstein’s bat.

The measures for Bechstein’s bat set out in the SPD are designed to ensure the successful conservation of the species in a high growth area and are in contrast to the limited scale of measures and overall layout proposed with the current application.

To summarise the scheme as proposed will result in the permanent loss of foraging habitat, will disrupt bat commuter routes which will be enclosed by development and crossed by an access road, and will lead to significant increases in recreational impacts in the retained areas. Together these factors will lead to a further fragmentation and isolation of the remaining area of habitats used by the local Bechstein’s bat population. Natural England therefore does not consider that the mitigation and compensation measures proposed by the application will fully mitigate for the harmful effects of the scheme, nor will the scheme serve to enhance Bechstein’s bat habitats within close proximity to a known maternity roost and or further the long term conservation of the local population.

If in the light of this advice Natural England advises that should your authority be minded to grant the scheme in its current layout then the additional housing numbers associated with the current proposals are used to enable further substantial mitigation and compensation measures designed to enhance the total bat foraging, roosting and commuting features and habitats within the wider locality. This might be achieved directly by the applicant, and or through a secured funding contribution to wider Bechstein’s bat conservation initiative to be agreed with the District Ecologist in consultation with Natural England. The value of the fund should be determined through the preparation of an agreed costed conservation plan for Bechstein’s Bat within the locality.

Natural England would be happy to comment on the detail of any enhancement scheme in due course.
If you have any queries relating to the advice in this letter please contact me on 02080 261472.

Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, we would be happy to provide advice through our Discretionary Advice Service.

03/06/20

Natural England previously responded to this application 20th April. The following advice considers the points covered by the “Technical Response to Natural England Comments, 05/05/2020”.

Nutrient neutrality
Natural England can confirm that we are satisfied with the recalculated nutrient budget submitted by EPR, which demonstrates that the scheme will achieve a nitrogen reduction of -56 kg / year. Natural England welcomes the negative nitrogen budget for the scheme, which relies on the provision of significant areas of open space. However, while no further nitrogen mitigation measures are required the scheme would not maintain neutrality for the duration of the effect as is required by the Appropriate Assessment if the areas of open space were subsequently reduced in scale. Your authority should therefore consider whether any addition safeguards are needed to ensure the features of the scheme that have allowed it to secure nitrogen neutrality (or in this case a reduction in Nitrogen levels) are appropriately maintained for the lifetime of the proposals. Provided you are satisfied such safeguards are in place then Natural England has no further concerns relating to this aspect of the proposals.

**Soakfield Row**

Natural England notes the site is not recognised as an SINC. Our concerns however are to ensure sufficient evidence is available to be assured the site does not qualify as ancient woodland. The additional information provided by EPR at Table 1 is helpful in this regard as it at least suggests that the ancient woodland status of woodland parcels smaller <2 ha in this locality have been previously assessed and Soakfield Row not included. Natural England also accepts the current difficulty of checking the historical tithe maps as recommended in our previous correspondence which would have provided more definitive evidence. Therefore although the evidence base is not fully complete, we are satisfied that the scheme has now provided the best available evidence to indicate the woodland is not ancient. Natural England also welcomes the additional commitment (EPR paragraph 3.7) for further tree planting across the development. In our view this should comprise of native trees and or fruit trees. For example, the provision of a single suitable tree in each plot would significantly improve the ecological characteristics of the developed areas as well as provide additional natural capital benefits. Natural England advised in our last response dated 20th April 2020 that the woodland compensation package should be in line with the Biodiversity Metric 2.0. Given the 15:1 ration of new woodland planting it would seem likely that the proposals would meet this standard. However, if following this assessment, further compensation is considered necessary then Natural England recommends any necessary increases in woodland planting is secured as part of the Landscape and Ecological Enhancement and Mitigation Plan. In light of the information provided by EPR Natural England has no further concerns relating to this aspect of the proposals.
Bechstein’s Bats

Natural England maintains our concerns that the mitigation and compensation measures proposed by the application will not fully mitigate for the harmful effects of the scheme, nor will the scheme serve to enhance Bechstein’s bat habitats within close proximity to a known maternity roost and or further the long term conservation of the local population. We note that the Technical Response dated 5th May 2020 sets out they meet the minimum recommended requirement for buffer zone of 15m as set out in the Trowbridge SPD however this is a minimum recommendation, Natural England advises buffer zones should be in proportion to the size of the development, for a larger development such as this we would expect to see a proportionately larger buffer zone. For example, the buffer agreed from SSSI woodlands known to support maternity roosts of Bechstein’s bat affected by the Trowbridge Ashton Park Urban Extension was 100m. The Trowbridge Bat Mitigation Strategy SPD also sets out a requirement for a minimum bat corridor within development of 45m, with 15 m natural dark zones sandwiching a 15m metre block of habitat. In this case the bat commuting corridor provides an essential link between the maternity roost and foraging habitats to the south, in such circumstances the corridor provided should exceed the minimum specifications. The corridor provided in this instance is also further compromised by access roads.

Natural England agrees with EPR that Bechstein’s bats are a predominately woodland species, however, surveys of the local bat populations have shown they will also exploit more open areas, such as cattle grazed fields. Parkland landscapes are also considered important habitats. Here it is worth noting that the Trowbridge SPD specifically records that Bechstein’s bat “regularly forage of grazed pastures” (para 66) in East Hampshire. In this case the loss of open habitats is in very close proximity to the maternity roost and will form part of the available foraging, particularly for juvenile bats. It is therefore in our view unsafe to simply discount the loss of open habitats in such close proximity the maternity roost as insignificant.

Indeed based on the information available Natural England advises that all potential habitat, including grazed fields, hedgerows with standard trees in such close proximity to a maternity roost should be considered as key foraging habitats. EPR also contend that the proposals exceed the requirements of the Trowbridge SPD, yet the SPD concludes that loss of habitat and recreational impacts within 600m of “Core Roosts” is “High Risk” and in the context of the designated Bath and Bradford on Avon Bat Special Area of Conservation (SAC) would have an adverse impact on the integrity and further that it would be unlikely for development in the high risk zones to be able to fully mitigate for impacts. While, it may be inappropriate to apply the same standards in a non-SAC habitats, the scheme lies in very close proximity to a long standing Bechstein’s bat maternity roost, an Annex II species of the Habitats Directive and considered one of the rarest bats in the UK. Loss of any habitat in such close proximity, combined with the inevitable impacts of recreational use of the woodlands cannot be discounted as “insignificant”, as suggested by the EPR report.
Therefore Natural England continues to advise that should your authority be minded to grant the scheme in its current layout then the additional housing numbers associated with the current proposals are used to enable further substantial mitigation and compensation measures designed to enhance the total bat foraging, roosting and commuting features and habitats within the wider locality. This might be achieved directly by the applicant, and or through a secured funding contribution to wider Bechstein’s bat conservation initiative to be agreed with the District Ecologist in consultation with Natural England. The value of the fund should be determined through the preparation of an agreed costed conservation plan for Bechstein’s Bat within the locality.

Planning Policy - EHDC

29/1/19

Proposal: Outline planning application with all matters reserved, except the means of access to the highway network (junction arrangements) and associated highway improvements, for the demolition of existing buildings and the residential-led (C3) mixed-use development of the site with up to 800 dwellings, up to 2ha of employment land (uses B1 and B2), a Local Centre (including: local retail (food and non-food A1); financial and professional services (A2); restaurants, cafés, and drinking establishments (A3 and A4), hot food takeaways (A5), together with a primary school (D1) and community facilities (D2)), informal and formal open space, allotments, and acoustic bunds, together with associated drainage, utilities and all other associated and necessary infrastructure.

The relevant Development Plans in determining this application are:

a) Joint Core Strategy (2014)
b) Housing and Employment Allocations Plan (2016)

I note that that this application is similar in nature to 55562/001, on the same site, albeit a larger area, which was approved on 5th February 2016. It is noted this new outline application is for the northern parcel (B) and southern parcel (C), and increases the number of proposed dwellings from 700 to 800.

The anticipated application for the remaining parcel of land (A) should also be taken into consideration to address the provision of a care village that was proposed in the original application (55562/001).

It should be highlighted that depending on timescales associated with the submission of Reserved Matters, future applications may need to adhere to planning policies within the emerging Local Plan. Although only at a draft (Regulation 18) stage, the plan is likely to be submitted towards the end of the year, whereby more weight should be attributed to its content.
Key Policies from Development Plans

The East Hampshire Five Year Housing Land Supply document that was published on the 10th August 2018 demonstrates that as of the 1st April 2018 East Hampshire District can identify 6.57 years of housing land supply, equivalent to a surplus of 887 dwellings. The Council can demonstrate a sufficient five-year housing land supply; therefore, the appropriate Joint Core Strategy (JCS) policies for housing are up-to-date. It should be noted that this five-year housing land supply position would be achieved regardless of including the original approved planning permission for the site.

The site falls within the Settlement Policy Boundary (SPB) of Horndean and in line with Policy CP10, residential development would be appropriate within the defined settlement policy boundaries of towns and villages where it is consistent with maintaining and enhancing their character and quality of life. Housing should be accommodated through development and redevelopment opportunities within existing SPBs in the first instance.

In line with Policy CP2 of the JCS, Horndean is considered a ‘Level 2 - Large Local Service Centre’ within the Southern Parishes. In line with Policy CP10 there will be the provision of site allocations to provide a minimum of 700 dwellings at Horndean. These sites were identified in the East Hampshire District Local Plan: Housing and Employment Allocations (2016), of which the proposed site forms part of site allocation HN1. Therefore, the principle of developing the site is accepted.

Residential Development

A maximum of 800 dwellings (an increase of 100 dwellings) are proposed, which is broadly in conformity with Policy HN1 within the Housing and Employment Allocations Plan that advocates about 700 dwellings on the site. Policy CP10 within the JCS is also clear that the allocation of 700 dwellings in Horndean is a minimum.

Development should seek to maximise the delivery of affordable housing which we would expect to see on site. Policy CP13 sets a minimum 40% target requirement for affordable housing and the scheme proposes to deliver this target. It is noted that the precise mix and types of dwellings will be determined at reserved matters stage, where it will be important to consult the Council’s Housing Enabling Officer.

Employment Development

Policy CP3 within the JCS makes provision for about 2ha of land for industrial (B2) and business use (B1) in Horndean. Policy HN1 within the Housing and Employment Allocations Plan suggests this employment requirement should be provided on this site. It is noted that the application proposes to meet this requirement, by providing up to 2ha of land for employment uses (an increase from 1.7ha proposed in the original application). Planning Policy support this increase in provision.
Community

The provision of community facilities, including primary school is supported as it conforms to Policy HN1 (c), however, proposed as D2 use is considered overly restrictive. Many community centres are used for other facilities such as creches, day nurseries and meeting halls (D1 uses), opposed to the assembly and leisure uses associated with D2 uses.

Other Matters

Within the criteria to Policy HN1, Criterion (h) requires that development shall

Conclusion

In light of the above, subject to the case officer and external statutory consultees being satisfied that the proposed development satisfies all the criteria detailed within Policy HN1, it is considered that the principle of the proposed development accords with the relevant local and national planning policies. The application should also not prejudice the separate delivery of the care village element of the policy, which was part of the original outline application. Therefore, there is no policy objection subject to the application being acceptable in all other respects.

Portsmouth Water

31/1/19

Thank you for consulting Portsmouth Water on the outline planning application for Development Land East of Horndean, please see attached Portsmouth Water’s formal consultation response.

In our response we have included the conditions we would wish to remain on this application. Furthermore, if outline planning consent is grant Portsmouth Water would ask to be consulted on any further submissions which relate to discharge of reserved matters relating to protecting the environment, biodiversity and water quality.

Portsmouth Water have reviewed the information associated with the above application and have the following comments.

Where our comments relate to specific documents these have been referenced in the heading:

The proposed development site is located in a very sensitive area with regards to groundwater protection and our drinking water resources. It is in a Source Protection Zone One (SPZ1) and prone to solution features resulting in the potential for rapid movement of pollutants through the catchment.
Construction Environmental Management Plan (CEMP)

Portsmouth Water request the Construction Environmental Management Plan (CEMP) is updated when all information is available and more details are provided on the following areas:

- Contact details once available. Please also include the Environment Agency Incident Hotline and contact details of the Catchment Management Team at Portsmouth Water. The reporting procedure in the event of a pollution incident must be laid out in the CEMP;

- Wheel washing facilities, pollution prevention measures and drainage details;

- Details of plant fuelling should be incorporated in the CEMP identifying where will it occur, how it will be contained, drip trays and designated drainage via interceptors for example;

- Plant and machinery should be inspected daily to check for leaks and faulty equipment;

- Training and awareness of Contractors must also incorporate pollution prevention and spill response procedures;

Surface Water Drainage

Further details on the proposed surface water drainage systems are required to fully assess the potential risks posed to groundwater quality at the reserved matters stage.

Portsmouth Water are pleased to see that deep-bore soakaways are not proposed as a means of surface water discharge as we have a presumption against them in source protection zones one and would oppose their use.

Land Contamination

GROUND_CONDITION_ASSESSMENT_AND_INVESTIGATION_REPORT

The site investigation does not indicate the presence of significant contamination in the subsurface however, the proposed development is over a large area and there are likely to be data gaps. Portsmouth Water request the Applicant develops/shares their discovery strategy and what measures will be taken in the event that unanticipated contamination is encountered.

Portsmouth Water request that details of proposed groundwater monitoring be provided at the detailed reserved matters stage.

Solution Features
As identified the area is prone to solution features and therefore we support the proposed approach to assessing each soakaway location as outlined in ENVIROMENTAL_STATEMENT_APPENDIX_K_PART_2-825983 (Technical Note PBA, 1 October 2018).

Portsmouth Water support the following approach:

- In areas where chalk is encountered in shallow soakaway excavations, a visual inspection by an experienced geotechnical engineer or engineering geologist will need to be completed of the exposed chalk to assess for the presence of solution features. If solution features are absent, then shallow soakaways can be used with a minimum off set from structures of 5m;

- In areas where chalk is not encountered within the depth of the shallow soakaway it will not be possible to assess visually whether solution features are present or not. In this situation either the use of shallow soakaways is possible if located at a minimum of 20m measured from the edge of the soakaway to the structures, or they can be located closer to a structure provided that the soakaway position is investigated (probes/boreholes) to prove the absence of a solution feature;

**Recommended Planning Conditions**

Portsmouth Water request that the following conditions are considered by the Local Planning Authority to reduce the potential risks posed to groundwater and our resource as a result of the proposed development:

1. No development shall take place on any phase of the development until a surface water drainage scheme for that phase, based on sustainable drainage principles and a comprehensive assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority in consultation with the Environment Agency and Portsmouth Water. The scheme shall subsequently be implemented in accordance with the approved details before any building within that phase is occupied.

Details of how the scheme shall be maintained and managed after completion shall also be included.

Reason - To reduce the risk of groundwater pollution and prevent the increased risk of flooding, both on and off site. Note: The drainage scheme design will be required to take account of the location of any solution features present in order to avoid and mitigate risks.
2. If, during development, contamination not previously identified is found to be present at the site then the local planning authority must be notified immediately. No further development (unless otherwise agreed in writing with the local planning authority in consultation with the Environment Agency and Portsmouth Water) shall be undertaken in that phase until the developer has submitted and had approved a site investigation, risk assessment and remediation strategy report, detailing how to mitigate the contamination identified. The remediation strategy approved by the local planning authority shall be implemented in full before development in that phase recommences.

Reason - To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to Controlled Waters, drinking water supplies, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

3. No building or structure, including drainage infrastructure and utility trenches shall be located within a 10m stand-off zone surrounding any solution feature.

Reason - Paragraph 121 of the National Planning Policy Framework paragraph states that planning policies and decisions should also ensure that the site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation.

Solution features can create zones of instability that provide a direct connection to the aquifer. Such features in this area have been shown to provide rapid transmission pathways for pollutants direct to the springs at Havant & Bedhampton. As a result a precautionary approach to development is needed to protect this important public drinking water supply.

4. No piling or any other foundation construction using penetrative methods shall be carried out other than with the express written consent of the local planning authority in consultation with the Environment Agency and Portsmouth Water. The development shall be carried out in accordance with the approved details.

If piling or other penetrative measures were to be approved in lower risk areas of the site a detailed method statement must be submitted to and agreed before such works commence with the local planning authority, in consultation with the Environment Agency and Portsmouth Water. The method statement should detail the equipment, methodology, grout, control measures and monitoring that will be implemented to ensure there is no increased risk to controlled waters or drinking water supplies.

Reason - The site lies within the groundwater Source Protection Zone 1 for the Havant and Bedhampton Springs, a public drinking water supply. Solution features and karstic fissures connected to the Havant & Bedhampton Springs are known to be present in this area which increases the risk of pollutants entering groundwater rapidly without attenuation.
Piling or any other foundation construction methods using penetrative methods could allow hazardous substances and non-hazardous pollutants to enter groundwater by, for example, mobilising contamination and creating preferential pathways. Thus it should be demonstrated that any proposed piling:

a. Will not result in contamination of groundwater. This is in accordance with National Planning Policy Framework paragraph 109.

b. Nor any increased risk to drinking water supplies (including turbidity).

c. Nor deterioration in the transmissivity of the aquifer.

5. No development shall take place, or if a phasing plan has first been agreed in writing by the Local Planning Authority, no development of the individual phase, until full details of any proposed below ground engineering works including land stabilisation measures, has been submitted to and approved in writing by the local planning authority in consultation with the Environment Agency and Portsmouth Water. Those works shall be designed based upon a comprehensive assessment of the hydrological and hydrogeological context of the development, informed by detailed geophysical and ground investigations including the identification of the location of any solution feature that may act as a pathway for pollutants to reach groundwater. The works shall be designed and carried out in such a way as to ensure that they do not pose any potential risk to ground water quality, or drinking water supplies, by way of contamination or adverse effect on turbidity. The works shall be implemented in accordance with the approved details before the development of that phase is occupied.

Reason - Paragraph 121 of the National Planning Policy Framework paragraph states that planning policies and decisions should also ensure that the site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation.

Solution features can create zones of instability that provide a direct connection to the aquifer. Solution features in this area have been shown to provide rapid transmission pathways direct to the springs at Havant & Bedhampton. As a result a precautionary approach to development is needed to protect the public water supply.

The applicant needs to demonstrate that groundwater will be protected in accordance with National Planning Policy Framework (NPPF) paragraph 109.

6. No phase of development shall commence until such time as a scheme to dispose of foul water for that phase has been submitted to, and approved in writing by, the local planning authority in consultation with the Environment Agency, Portsmouth Water and Southern Water. The scheme shall be implemented in accordance with the timetable agreed as part of the approved scheme.

The scheme shall also include:
- details of how the scheme shall be maintained and managed after completion.
details of the sewage pipe work layout and specifications.

Reason - This is in order to manage the quantity of foul sewage and protect the Havant and Bedhampton Springs Source Protection Zone 1 in the development area. The site lies in an area where solution features are known to be present. In accordance with position G8 of Groundwater Protection: Principles and Practice, the applicant must use the highest specification pipework and designs to minimise leakage. The layout and design of the sewage system must take into account areas of extreme, very high, or high groundwater vulnerability, in order to minimise the risk to controlled waters and the public drinking water supply.

7. No underground storage tank used for the storage of hazardous substances shall be permitted at the site.

Reason - The site lies within the groundwater Source Protection Zone 1 for the Havant and Bedhampton Springs, a public water supply. Solution features and karstic fissures connected to the Havant & Bedhampton Springs are known to be present in this area which increases the risk of pollutants entering groundwater and travelling rapidly without attenuation to pollute the public water supply.

8. No development will commence, or if a phasing plan has first been agreed in writing by the Local Planning Authority, no development of the individual phase, until details are submitted to the local planning authority demonstrating how all roads and parking areas will be carefully constructed to ensure that all drainage discharges through appropriately sized interceptors, before passing into the surface water drainage system. The scheme shall be designed to ensure that run off does not pose any potential risk to groundwater quality by way of contamination or adverse effect on turbidity. The scheme shall include details of how the interceptors will be maintained and managed after completion. The scheme shall be approved by the local planning authority in consultation with the Environment Agency and Portsmouth Water before works commence on each phase. The works shall be implemented fully in accordance with the approved details before the development of that phase is occupied.

Reason - The site lies within the groundwater Source Protection Zone 1 for the Havant and Bedhampton Springs, a public drinking water supply. Solution features and karstic fissures connected to the Havant & Bedhampton Springs are known to be present in this area which increases the risk of pollutants entering groundwater and travelling rapidly without attenuation to pollute the public water supply.

The purpose of incorporating interceptors into the design is to capture any hydrocarbons and other contaminants to break the pollutant chain.
9. The relevant reserved matters applications shall identify all areas of employment land that could be used to store potentially polluting material, or vehicles. Such areas must be underlain by an impermeable surface which prevents drips or spills infiltrating into the ground. The surface must be designed to ensure that all run off from such areas drains efficiently via appropriately sized interceptors before entering the site surface water collection system. The scheme shall include details of how the interceptors will be maintained and managed after completion. Chemicals and hydrocarbons must be stored within a bunded area capable of containing 110% of the capacity stored. The scheme shall be approved by the local planning authority in consultation with the Environment Agency and Portsmouth Water before works commence on each phase. The works shall be implemented fully in accordance with the approved details before the development of that phase is occupied.

Reason - The site lies within the groundwater Source Protection Zone 1 for the Havant and Bedhampton Springs, a public drinking water supply. Solution features and karstic fissures connected to the Havant & Bedhampton Springs are known to be present in this area which increases the risk of pollutants entering groundwater and travelling rapidly without attenuation to pollute the public drinking water supply. The purpose of incorporating interceptors in to the design is to capture any hydrocarbons and other contaminants to break the pollutant chain.

10. Prior to the commencement of development, or if a phasing plan has first been agreed in writing by the Local Planning Authority, no development of the individual phase, the developer shall advise the Local Planning Authority of the measures which will be undertaken to protect public sewers. The development shall be carried out in accordance with the approved details.

Reason - To ensure proper protection of public sewers in the interests of public health and the protection of groundwater.

11. No development shall start on site, or if a phasing plan has first been agreed in writing by the Local Planning Authority, no development of the individual phase, until details of offsite foul water drainage have been submitted to and approved in writing by the Local Planning Authority. The development works shall be carried out in accordance with the approved details before any part of the development is occupied and shall be retained thereafter.

Reason - To ensure adequate provision for foul drainage

**Havant Thicket Winter Storage Reservoir (HTWSR)**

Land to the south of the development site is safeguarded in the East Hants District Council (EHDC) and Havant Borough Council Local Plans for provision of a new winter storage reservoir, which is essential to provide new drinking water supplies to the South-East, while also providing new green infrastructure for local community use. It is important to ensure that any development taking place close to the planned site of the reservoir does not have an adverse impact on the ability of Portsmouth Water to obtain planning permission for and deliver this vital new community infrastructure project.
Bats

Site survey work commissioned by the developer and Portsmouth Water over a number of years has confirmed that the mix of woodland and grassland habitats in this area is an important resource for bats, including Bechstein’s bats. The Environment Statement Summary Table submitted with the application sets out the commitment of the developer to address the predicted impacts on ecology, including bats. Portsmouth Water welcome the outline mitigation proposals in relation to bats which include retention of the main woodland blocks and most hedgerows, development of grassland buffer zones around these important habitats for commuting, foraging and roosting bats, along with a commitment to a site management plan to protect and enhance biodiversity.

Given the proven presence of protected species including Bechstein’s bats using the development site and the wider landscape it is essential that the mitigation strategy ensures that there are no significant effects from the development in isolation, nor any in combination cumulative effects with other developments including HTWSR.

In order to ensure that a robust mitigation and compensation strategy is developed, approved and implemented it is essential that if planning consent is to be granted that the planning conditions applied by the Local Planning Authority to the previous outline consent to protect biodiversity are once again incorporated into any planning consent to secure submission, approval and implementation of:

- Detailed mitigation and compensation strategy including a site management plan
- Construction Environmental Management Plan, including programme and phasing
- Lighting strategy

Portsmouth Water would support the use of the two planning conditions proposed by the LPA Ecologist (HCC) on 23 January 2019.

This is especially important given that the outline development layout is subject to change and will enable the LPA ecologist to work with the developer to ensure a robust strategy is developed for both the construction and operational phases of the site.

The issue of lighting must be addressed in the final report, but more specifically as each phase of the development is commenced.

In addition to habitat mitigation / compensation important areas to consider in more detail will be;

- The programme and phasing of the work and how this will fit with the programme for delivery of the reservoir in an effort to minimise the impact on protected species.

Land East of Horndean (55562/005) Page 8 of 8 Portsmouth Water

- The strategy for restricting access to the important woodland habitats to minimise disturbance of protected species.
- Further monitoring of the Bechstein’s bat population to inform the mitigation strategy.

Portsmouth Water welcome the proposal for further monitoring work, including the commitment to complete the Bechstein’s bat diet study which will inform the strategy going forward. It would be helpful if this could be completed as soon as possible.

The developer proposes to deliver a biodiversity net gain through enhancement measures (Env.Statement Non Tech Summary NTS64). This includes providing bird and bat boxes in The Holt and Havant Thicket woodland. This could potentially conflict with the strategy Portsmouth Water have already discussed with the Forestry Commission of placing bird and bat boxes in Havant Thicket in relation to the reservoir project strategy. It is important that the developer’s advisors take a collaborative approach and work with Portsmouth Water, Forestry Commission, Natural England and the LPA Ecologist to agree a robust strategy for such enhancements which does not conflict with the reservoir project strategy.

If outline planning consent is granted Portsmouth Water would ask to be consulted on any further submissions which relate to discharge of reserved matters relating to protecting the environment, biodiversity and water quality.

**Access enhancements**

Portsmouth Water welcome the commitment in the application to new paths linking to the wider network, along with the proposed reduction in the speed limit on Havant Road and new toucan crossings to improve access. This is a very positive step forward, however, I note that the proposals do not extend the existing path network (including the path over the A3M bridge) to Havant Thicket.

As mentioned in Portsmouth Water letter dated 7 April 2015 relating to the previous outline consent application 55562/001; safe access from Horndean to Havant Thicket was something that Horndean residents felt was essential for walking, cycling and riding routes during the previous public consultation relating to the HTWSR project.

A link to the Havant Thicket woodland would provide access to the existing network of gravel paths which already link to Staunton Country Park, and ultimately the improved green infrastructure facilities the reservoir project will deliver. Portsmouth Water cannot deliver this access link which was important to the local community as the land is in private ownership.

This planning application offers EHDC the opportunity to negotiate this new link as the land owner of the current application site also owns the land south to the boundary of Havant Thicket.

Page 19 of the EIA Scoping highlights that the East Hants Local Plan states that the developer should provide new green infrastructure to connect to the wider network and improve habitat connectivity.
We look forward to working in partnership with the LPA’s to bring forward the reservoir project

30/9/19

Portsmouth Water have reviewed the amendments to the above application and have the following comments.

Portsmouth Water’s Position

Portsmouth Water do not object in principle to the proposed development, however there are a number of outstanding concerns regarding design and layout which will need to be addressed prior to full approval. Our concerns regarding groundwater quality protection can be addressed through the addition of appropriate planning conditions to reduce the potential risks posed to groundwater and our resource as a result of the proposed development.

Recommended Planning Conditions

In our previous representation we recommended conditions to be considered by the Local Planning Authority should permission be granted. The applicant has no objections to Condition 1 to 2 and 4 through to 11. They have however recommended the wording of Condition 3 be adjusted to reflect the possibility of minor works within area where solution features are identified or where solution features are suitably established in accordance with standard policy. We accept with appropriate mitigation measures the risk to groundwater could be adequately assessed and mitigated. Nevertheless, we would need to be fully consulted on these measures, thus we have revised the wording of Condition 3 to reflect this.

We have additional included a condition for the requirement for a Construction Environmental Management Plan (CEMP) as the current plan in the Appendix C of the Environmental Statement needs to be updated with further details and information for the final plan. Later in our response we outline what information we believe needs to be included for the final submission.

Below are the 12 planning conditions we would wish to be implied should permission be granted:

1. No development shall take place on any phase of the development until a surface water drainage scheme for that phase, based on sustainable drainage principles and a comprehensive assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority in consultation with the Environment Agency and Portsmouth Water. The scheme shall subsequently be implemented in accordance with the approved details before any building within that phase is occupied.

Details of how the scheme shall be maintained and managed after completion shall also be included.
Reason - To reduce the risk of groundwater pollution and prevent the increased risk of flooding, both on and off site. Note: The drainage scheme design will be required to take account of the location of any solution features present in order to avoid and mitigate risks.

2. If, during development, contamination not previously identified is found to be present at the site then the local planning authority must be notified immediately. No further development (unless otherwise agreed in writing with the local planning authority in consultation with the Environment Agency and Portsmouth Water) shall be undertaken in that phase until the developer has submitted and had approved a site investigation, risk assessment and remediation strategy report, detailing how to mitigate the contamination identified. The remediation strategy approved by the local planning authority shall be implemented in full before development in that phase recommences.

Reason - To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to Controlled Waters, drinking water supplies, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

3. No building or structure, including drainage infrastructure and utility trenches shall be located within a 10m stand-off zone surrounding any solution feature, unless appropriate mitigation measures are undertaken and approved in writing by the local planning authority in consultation with Portsmouth Water and the Environment Agency.

Reason - Paragraph 121 of the National Planning Policy Framework paragraph states that planning policies and decisions should also ensure that the site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation.

Solution features can create zones of instability that provide a direct connection to the aquifer. Such features in this area have been shown to provide rapid transmission pathways for pollutants direct to the springs at Havant & Bedhampton. As a result a precautionary approach to development is needed to protect this important public drinking water supply.

4. No piling or any other foundation construction using penetrative methods shall be carried out other than with the express written consent of the local planning authority in consultation with the Environment Agency and Portsmouth Water. The development shall be carried out in accordance with the approved details.
If piling or other penetrative measures were to be approved in lower risk areas of the site a detailed method statement must be submitted to and agreed before such works commence with the local planning authority, in consultation with the Environment Agency and Portsmouth Water. The method statement should detail the equipment, methodology, grout, control measures and monitoring that will be implemented to ensure there is no increased risk to controlled waters or drinking water supplies.

Reason - The site lies within the groundwater Source Protection Zone 1 for the Havant and Bedhampton Springs, a public drinking water supply. Solution features and karstic fissures connected to the Havant & Bedhampton Springs are known to be present in this area which increases the risk of pollutants entering groundwater rapidly without attenuation.

Piling or any other foundation construction methods using penetrative methods could allow hazardous substances and non-hazardous pollutants to enter groundwater by for example, mobilising contamination and creating preferential pathways. Thus it should be demonstrated that any proposed piling;

a. Will not result in contamination of groundwater. This is in accordance with National Planning Policy Framework paragraph 109.

b. Nor any increased risk to drinking water supplies (including turbidity).

c. Nor deterioration in the transmissivity of the aquifer.

5. No development shall take place, or if a phasing plan has first been agreed in writing by the Local Planning Authority, no development of the individual phase, until full details of any proposed below ground engineering works including land stabilisation measures, has been submitted to and approved in writing by the local planning authority in consultation with the Environment Agency and Portsmouth Water. Those works shall be designed based upon a comprehensive assessment of the hydrological and hydrogeological context of the development, informed by detailed geophysical and ground investigations including the identification of the location of any solution feature that may act as a pathway for pollutants to reach groundwater. The works shall be designed and carried out in such a way as to ensure that they do not pose any potential risk to ground water quality, or drinking water supplies, by way of contamination or adverse effect on turbidity. The works shall be implemented in accordance with the approved details before the development of that phase is occupied.

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Solution features can create zones of instability that provide a direct connection to the aquifer. Solution features in this area have been shown to provide rapid transmission pathways direct to the springs at Havant & Bedhampton. As a result a precautionary approach to development is needed to protect the public water supply.
The applicant needs to demonstrate that groundwater will be protected in accordance with National Planning Policy Framework (NPPF) paragraph 109.

6. No phase of development shall commence until such time as a scheme to dispose of foul water for that phase has been submitted to, and approved in writing by, the local planning authority in consultation with the Environment Agency, Portsmouth Water and Southern Water. The scheme shall be implemented in accordance with the timetable agreed as part of the approved scheme.

The scheme shall also include:

- details of how the scheme shall be maintained and managed after completion.
- details of the sewage pipe work layout and specifications.

Reason - This is in order to manage the quantity of foul sewage and protect the Havant and Bedhampton Springs Source Protection Zone 1 in the development area. The site lies in an area where solution features are known to be present. In accordance with position G8 of Groundwater Protection: Principles and Practice, the applicant must use the highest specification pipework and designs to minimise leakage. The layout and design of the sewage system must take into account areas of extreme, very high, or high groundwater vulnerability, in order to minimise the risk to controlled waters and the public drinking water supply.

7. No underground storage tank used for the storage of hazardous substances shall be permitted at the site.

Reason - The site lies within the groundwater Source Protection Zone 1 for the Havant and Bedhampton Springs, a public water supply. Solution features and karstic fissures connected to the Havant & Bedhampton Springs are known to be present in this area which increases the risk of pollutants entering groundwater and travelling rapidly without attenuation to pollute the public water supply.

8. No development will commence, or if a phasing plan has first been agreed in writing by the Local Planning Authority, no development of the individual phase, until details are submitted to the local planning authority demonstrating how all roads and parking areas will be carefully constructed to ensure that all drainage discharges through appropriately sized interceptors, before passing in to the surface water drainage system. The scheme shall be designed to ensure that run off does not pose any potential risk to groundwater quality by way of contamination or adverse effect on turbidity. The scheme shall include details of how the interceptors will be maintained and managed after completion. The scheme shall be approved by the local planning authority in consultation with the Environment Agency and Portsmouth Water before works commence on each phase. The works shall be implemented fully in accordance with the approved details before the development of that phase is occupied.
Reason - The site lies within the groundwater Source Protection Zone 1 for the Havant and Bedhampton Springs, a public drinking water supply. Solution features and karstic fissures connected to the Havant & Bedhampton Springs are known to be present in this area which increases the risk of pollutants entering groundwater and travelling rapidly without attenuation to pollute the public water supply. The purpose of incorporating interceptors in to the design is to capture any hydrocarbons and other contaminants to break the pollutant chain.

9. The relevant reserved matters applications shall identify all areas of employment land that could be used to store potentially polluting material, or vehicles. Such areas must be underlain by an impermeable surface which prevents drips or spills infiltrating into the ground. The surface must be designed to ensure that all run off from such areas drains efficiently via appropriately sized interceptors before entering the site surface water collection system. The scheme shall include details of how the interceptors will be maintained and managed after completion. Chemicals and hydrocarbons must be stored within a bunded area capable of containing 110% of the capacity stored. The scheme shall be approved by the local planning authority in consultation with the Environment Agency and Portsmouth Water before works commence on each phase. The works shall be implemented fully in accordance with the approved details before the development of that phase is occupied.

10. Prior to the commencement of development, or if a phasing plan has first been agreed in writing by the Local Planning Authority, no development of the individual phase, the developer shall advise the Local Planning Authority of the measures which will be undertaken to protect public sewers. The development shall be carried out in accordance with the approved details.

Reason - To ensure proper protection of public sewers in the interests of public health and the protection of groundwater.

11. No development shall start on site, or if a phasing plan has first been agreed in writing by the Local Planning Authority, no development of the individual phase, until details of off-site foul water drainage have been submitted to and approved in writing by the Local Planning Authority. The development works shall be carried out in accordance with the approved details before any part of the development is occupied and shall be retained thereafter.

Reason - To ensure adequate provision for foul drainage
12. No development, or if a phasing plan has first been agreed in writing by the Local Planning Authority, no development of the individual phase, shall start on site until a construction environmental management plan (CEMP) for each phase has been submitted to and approved in writing by the Planning Authority in consultation with Portsmouth Water outlining all pollution mitigation measures to be adopted during the construction phase. This should include management of overland runoff, storage of hazardous materials, chemical and hydrocarbons on site and temporary drainage infrastructure to ensure that water resources are not put at risk from leaks or spillages.

Reason- Fugitive emissions from the site during construction could pose a significant threat to groundwater and therefore the Havant & Bedhampton Springs.

Informatives

The proposed development site is located in a very sensitive area with regards to groundwater protection and our drinking water resources. It is in a Source Protection Zone One (SPZ1) and prone to solution features resulting in the potential for rapid movement of pollutants through the catchment. The site is also located in close proximity to the safeguarded site for provision of a new winter storage reservoir.

Where our comments relate to specific documents these have been referenced as a sub-heading:

Construction Environmental Management Plan (CEMP)

55562_005- ENVIRONMENTAL_STATEMENT_APPENDIX_C-825938

Portsmouth Water request the Construction Environmental Management Plan (CEMP) is updated when all information is available and more details are provided on the following areas:

- Contact details once available. Please also include the Environment Agency Incident Hotline and contact details of the Catchment Management Team at Portsmouth Water. The reporting procedure in the event of a pollution incident must be laid out in the CEMP;

- Wheel washing facilities, pollution prevention measures and drainage details;

- Details of plant fueling should be incorporated in the CEMP identifying where will it occur, how it will be contained, drip trays and designated drainage via interceptors for example;

- Plant and machinery should be inspected daily to check for leaks and faulty equipment;

- Training and awareness of Contractors must also incorporate pollution prevention and spill response procedures.

Surface Water Drainage
Further details on the proposed surface water drainage systems are required to fully assess the potential risks posed to groundwater quality at the reserved matters stage. The addition of an appropriate planning condition (Condition 1) will address this request.

**FLOOD RISK ASSESSMENT AND DRAINAGE STRATEGY REPORT**

We have reviewed the revised FRA and drainage strategy report by Abley Letchford Partnership Ltd 22nd July 2019. We welcome the additional measures where drainage systems cross the sensitive subsurface “paleochannel” to protect the channel from potential seepage of surface and foul water. This information should be included in the final foul and surface drainage strategies. We are also pleased to see that deep-bore soakaways have been ruled out as a means of surface water discharge as we have a presumption against them in source protection zones one and would oppose their use.

*Land Contamination*

**GROUND_CONDITION_ASSESSMENT_AND_INVESTIGATION_REPORT**

The site investigation does not indicate the presence of significant contamination in the subsurface however, the proposed development is over a large area and there are likely to be data gaps. Portsmouth Water request the Applicant develops/shares their discovery strategy and what measures will be taken in the event that unanticipated contamination is encountered. Condition 2 of our recommended conditions covers this requirement.

Portsmouth Water request that details of proposed groundwater monitoring be provided at the detailed reserved matters stage.

**Solution Features**

As identified the area is prone to solution features and therefore we support the proposed approach to assess the presence of these features in excavations. All pumping station excavations are to be inspected for evidence of solution features by an experienced geotechnical engineer or engineering geologist.

**Post-Application Technical Submission**

In section 4, sub-section 4.1.1 it states ‘Portsmouth Water (PW) – the incumbent Statutory Undertaker for potable water supply, foul and surface water drainage’. We are only the statutory undertaker for potable water supply and not for foul or surface water drainage, please could this document be updated.

**Protection of Bechstein’s Bats**

We are pleased to see that the applicant agrees that a collaborative approach to Bechstein’s bat mitigation, including all stakeholders (Forestry England, Natural England, LPA Ecologist and Portsmouth Water) is required. We look forward to working with the applicant and/or their representatives to deliver robust and strategic Bechstein’s bat mitigation.
Recycling and Refuse - EHDC

22/8/19

There is no mention at all on the plans as far as I can see regarding domestic refuse collections. There are no plans showing the sweep of the refuse vehicles or planned collection points.

When I originally commented back in March 2019 (my comments have not been saved only the PDF I attached showing the refuse vehicle collection sizes) I did advise that we will only collect domestic refuse and do not comment on the trade waste collections.

All properties will need storage space for 1x 240 ltr recycle bin and 1x 240 ltr refuse bin. plus a 38 ltr glass box container and an optional additional 240lt garden waste bin. All bins will need to be placed at the edge of the property for collection. Our crew will not be expected to cross private areas and will not be expected to reverse in order to make collections.

There will be a need for collection points where properties cannot be accessed as crews will not be expected to walk bins out. The current plans are not detailed enough to comment fully.

Developers will need to ensure there is enough room for the full vehicle sweep allowing for the lifters at the rear of the vehicle. We will also need to ensure that the carriageways are clear of parking to allow for adequate room for the collections.

Please see original documents that were attached for the dimensions of the current refuse collector. You will need to use the larger size shown in the PDF attached on 6th March 2019.

Rowlands Castle Parish Council

24/01/19

Rowlands Castle Parish Council (RCPC) considered this Application at its Meeting on 7 January 2019 and unanimously resolved to OBJECT to it for the reasons outlined below. RCPC calls for a major revisit of the issues identified within the Application.

RCPC has focused its research and subsequent objections on the (unreserved) matters of the means of access to the highway network (junction arrangements) and associated highway improvements aspects of this Application. Despite its emphasis on highways matters, RCPC found it notably difficult and time-consuming to track down the relevant information within the Application’s 90 or so documents listed on EHDC’s website. The required information was traced to 2 documents: Environmental Statement - Traffic and Transport and Environmental Statement Appendix J Part, the latter described as such but upon opening was actually titled Transport Assessment (hereafter referred to as the TA). Further comment on these documents is provided at Point 18.
RCPC found the TA to be inaccurate and inadequate. It does not consider the cumulative impact of this site along with other dwellings under construction, committed developments and allocated sites using the highway network in the area. Listed below are RCPC’s findings regarding the TA and other documents which led to its objection to the Application. The numbering corresponds to the paragraphs in the more detailed Report and Annexes enclosed with this letter.

**A. Omission of, or inaccurate information on, the cumulative impact of current and committed developments and allocated sites in the area**

1. Incorrect claims that the Land South of Oaklands House development (106 dwellings) in Rowlands Castle was largely complete and that its traffic was recorded by the traffic surveys. No dwellings were occupied at that time.

2. No assessment of growth in traffic from further 80 dwellings under construction in Rowlands Castle, none of which were occupied when the traffic survey was undertaken. There is also another site allocated for 10 dwellings.

3. No assessment of the impact of traffic from dwellings under construction and allocated sites in nearby areas of Havant Borough which will use Havant Road to connect with the A3(M):

   3.1. **300** dwellings under construction,
   
   3.2 Sites allocated for **139** dwellings in the Havant Borough Council Local Plan (Allocations) (July 2014) covering the period up to 2026 which is within the period considered by this Application (up to 2030).
   
   3.3 Sites allocated for **2,400** dwellings up to 2036 and a further **1,000** thereafter, in the emerging Havant Borough Council Local Plan. A proportion of these would be developed before 2030.

**B. Inaccurate Information about traffic generated by LEOH Development**

4. Inappropriate use of residential traffic trip rates determined in 2014, thereby relying on a very outdated version of the calculation system and its 2005/7 surveys. That determination did not adequately consider the mixed tenure of the application site and its scale.

5. **25%** of the residential trips from the development will use the B2149 Havant Road South of Pyle Lane at peak times to reach Havant. A further **3%** would arise from journeys to Rowlands Castle or Havant railways stations to reach London. This will result in an increase at peak times of **20%** in south-bound traffic on that road. The application distributed only **16%** of the additional traffic to Havant Road (South). There will be an increase in trips on Rowlands Castle Road of **7%** and not **0%** as stated in the application.
6. Incorrect implication that the part of Havant Road south of the development will not experience an increase in AM and PM peak flows of greater than 10% and that therefore it is not considered in the Environmental Assessment. The increases in the AM and PM peak flows will be 11.9% and 11.5% respectively.

7. No mitigation proposed for the increase in traffic that will cause the mini-roundabouts at the junction of Manor Lodge Road, Durrants Road, Whichers Gate Road and Redhill Road, to be overloaded.

8. No assessment of the impact of increased traffic on the junction of Havant Road and Castle Road.

9. No assessment of the impact of increased traffic on the junction of Manor Lodge Road (a continuation of Havant Road) and Mallard Road that already experiences delays and queuing at peak times. It is the only exit for the 160 dwellings in the Kings Meadow Estate.

10. Gross underestimate of the increase in traffic on Rowlands Castle Road.

C. No recognition of impact of travelling to local facilities in Rowlands Castle

11. No recognition that the entire application site is within the catchment area of the Rowlands Castle GP Surgery that will probably require residents of the application site to drive into the centre of the Rowlands Castle village, which has very limited parking facilities.

12. No recognition that approximately 40% of the area south-west of Havant Road is within the catchment area of the Rowlands Castle St. John’s Church of England Controlled Primary School.

D. Road layout

13. Site accesses B and C should have ‘ghost islands’ and not be simple priority junctions. In addition to serving the stated 104 dwellings, access C will be used by school traffic and other areas of the site.

14. No consideration is given to the likely increased use of Pyle Lane as a ‘short cut’ from Havant Road to Rowlands Castle Road in the vicinity of the site. At the junction of Pyle Lane and Rowlands Castle Road there is a blind bend with limited visibility.

E. Other issues:

15. Non-compliance with EHDC Local Plan (2014) policy CP31 because no proposals are made to improve access to and parking at, or adjacent to, Rowlands Castle railway station.

16. No consideration of the cumulative impact of construction traffic arising from the possible development of the Havant Thicket Reservoir, which could be taking place while this site is being developed.
17. There should be a permanent and enforceable planning requirement that the bus gate entrance onto Rowlands Castle Road should not be made available for a more general use by other vehicles. Otherwise, this would result in a very significant use of Rowlands Castle Road as a route for travelling eastwards.

18. RCPC would normally expect an Application of this scale and nature to include substantial transport-related documentation in the form of a named Transport Assessment or Statement to justify the proposals therein. In RCPC’s opinion, neither

The *Environmental Statement - Traffic and Transport nor Environmental Statement Appendix J Part 1 (TA)*, constitute an appropriate level of examination and evidence to support this Application.

It is important that the proposed highways improvements should accurately consider and accommodate the total cumulative volume of traffic that will be using Havant Road and other parts of the highway network in 2030 which is when it is anticipated that the development of the site would be complete. This would be to the benefit of both the residents of the proposed development and neighbouring areas such as Rowlands Castle, and of all users of the highway network.

Thank you for the opportunity to comment on this Application.

**Annex A**

This Annex provides the paragraphs of the *Environmental Statement - Traffic and Transport* and *Environmental Statement – Technical Appendix J: Transport Assessment* on which RCPC’s comments in the main Report are based. The comments are shown below, underlined to save referring back to the paper.

**A. Omission of, or Inaccurate Information on, the cumulative impact of current and committed developments and allocated sites in the area**

1. Incorrect claims that the Land South of Oaklands House development (106 dwellings) was largely complete and that its traffic was recorded by the traffic surveys. No dwellings were occupied at that time.

The traffic survey was undertaken between 27th June and 3rd July 2018. Minutes of the EHDC Developer Liaison meeting for this site on 18th June 2018 show that the first occupation was expected in the first week of July 2018 and the minutes for 13th November show that 10 dwellings had been occupied.

a. Paragraph 11.15 of the ‘Traffic and Transport Environmental Statement’ states:

‘Land South of Oaklands House, Redhill Road, Rowlands Castle – not included. This development is largely complete and its traffic will have been incorporated in the baseline flows recorded by the traffic surveys’

‘Land South of Oaklands House, Rowlands Castle was not included because it has been largely built out and flows will have been captured in the traffic surveys’.

c. Paragraph 2.45 of the ‘Environmental Statement – Technical Appendix J: Transport Assessment’ states:

‘Automatic Traffic Counters (ATC) were installed by Nationwide Data Collection (NDC) on behalf of Vectos between the 27th June 2018 and the 03rd July 2018 to ascertain the existing traffic flows in the vicinity of the site.’

d. The minutes of the Liaison meeting on 18th June 2018 for the Land South of Oaklands House development (EHDC Reference: 30016/018) which was chaired and minuted by the EHDC ‘Community Development Officer – New Housing’ and which was attended by, amongst others, the developer’s site manager and technical manager, an EHDC Development Inspector and parish councilors, record the site manager’s statement that:

‘1st occupation is anticipated for 1st week in July, the first affordable unit occupation is anticipated for the end of July’.

e. The minutes of the Liaison meeting on 13th November 2018 record the site manager’s report that:

‘…. 10 properties were in occupation……’

f. Copies of both sets of minutes would be available on request from the EHDC Community Development Officer. They give irrefutable evidence that the Land South of Oaklands House site was not largely developed at the time of the June traffic survey and that its traffic flows were not included in that traffic survey. Therefore, the impact of the additional traffic from the 106 dwellings on this site has not been considered.

2. No assessment of growth in traffic from 80 dwellings under construction in Rowlands Castle, none of which were occupied when the traffic survey was undertaken. There is also a site allocated for 10 dwellings.

These developments are within 0.5 miles of the application site and the only committed development considered is at Woodcroft Farm in Waterlooville which is about 1.5 miles by road to the west of site Access A (Dell Piece East Roundabout).

a. Paragraph 11.15 of the ‘The Traffic and Transport Environmental Statement’ does not refer to the following Committed Developments which are only 0.5 mile from Havant Road:

- Keyline Builders’ Merchants, Redhill Road, Rowlands Castle (EHDC Reference: 23856/009) – 46 dwellings. This is currently under construction, but no dwellings have yet been occupied.
Land East of College Close (EHDC Reference: 55268) – 34 dwellings. This is currently under construction and the first dwellings were occupied shortly before Christmas 2018.

Land South of Oaklands House (EHDC Reference: 30016/031) – 10 retirement bungalows. This site is not yet under construction.

b. Paragraphs 11.15 of the ‘Traffic and Transport Environmental Statement’ and 6.13 of the ‘Environmental Statement – Technical Appendix J: Transport Assessment’ show that the committed development on Woodcroft Farm in Waterlooville (ref: APP/13/00804) has been considered. The distance by road from this development to the Havant Road / Dell Piece East Roundabout (access A) is about 1.5 miles which is three times the distance of the three developments referred to above and on the other side of the A3(M).

3. No assessment of the impact from traffic from dwellings under construction and allocated sites in nearby areas of the Havant Borough which will use Havant Road to connect with the A3(M).

Although the application states that the B2149 Havant Road connects the A3(M) to the north and Havant and Emsworth to the south, it does not assess the growth in traffic along that road arising from committed developments and allocations in those areas which are within the Havant Borough but within 2.5 miles of the southern boundary of the application site. Traffic from these areas will connect with the Havant Road via Whichers Gate Road or Durrants Road which connect at a mini-roundabout junction to Manor Lodge Road, a continuation of Havant Road.

The application uses the National Trip End Model for all road types to derive background growth factors for the AM and PM peak hours only for East Hampshire.

The stated growth rates between 2018 and 2030 for AM Peak (1.0619) and PM Peak (1.0568) would not reflect the cumulative impact of traffic from these developments.

a. Paragraph 11.34 of the ‘Traffic and Transport Environmental Statement’ states: ‘The B2149 Havant Road runs between the northern and southern parcels of the site, connecting to the A3 to the north and Havant and Emsworth to the south…….’

b. The ‘Environmental Statement – Technical Appendix J: Transport Assessment’ states: 6.6. The TEMPRO National Trip End Model AF15 dataset for all road types (i.e. worst case) has been used to derive background growth factors for the AM and PM peak hours for East Hampshire 016 (E02006829):

6.7. TEMPRO National Trip End Model traffic growth is in part, calculated based on the forecast growth of households and jobs associated with the sites allocated in the Local Plan. The land east of Horndean (the application site) is allocated for the mixed residential-led development in policy HN1 of the East Hampshire District Local Plan.
6.8. In order to prevent double-counting of future traffic, alternative assumptions were applied to the 2018-2030 TEMPRO growth factors. No additional committed developments or allocations have been identified within the TEMPRO area. As such, the forecast increase in households and jobs are likely to be associated with the application / allocation site (which is also a committed development by virtue of its extant planning permission).

6.9. The following growth rates were derived from TEMPRO:
• 2018 -> 2030 AM Peak – 1.0619; and
• 2018 -> 2030 PM Peak – 1.0568.

The following sentences give more details of these developments and allocations for which no assessment has been made.

3.1 Committed developments for 300 dwellings within 2.5 miles of the southern boundary of the application site for which no assessment has been made. All of these are under construction but were not occupied in June 2018 when the traffic survey was carried out.

a. West of Horndean Road (Havant Borough Council (HBC) Ref: APP/14/00547) -125 dwellings. This is Policy UE13 in the Havant Borough Council Local Plan (Allocations). The site is about 0.5 miles south of the EHDC boundary

b. Land South of Bartons Road (HBC Ref: APP/15/01435) – 175 dwellings. This is site UE3b in the Havant Borough Council Local Plan (Allocations) Policy HB1. It is about 100m south of the EHDC boundary

3.2 Site Allocations for 139 dwellings in the Havant Borough Council Local Plan (Allocations) (July 2014) covering the period up to 2026 which is included within the period of this application which assumes development would take place from 2020 to 2030. No assessment has been made.

a. Policy L145 – SSE Offices Site, Bartons Road – 90 dwellings. This site is about 100 metres south of the EHDC boundary. Planning application APP/16/00940 for approval for demolition has been granted, but construction has not yet commenced.

b. PolicyUE43 – Havant Garden Centre, Bartons Road – 49 dwellings. This site is also about 100 metres south of the EHDC boundary. No planning application has yet been submitted

3.3 Sites allocated for 2,400 dwellings up to 2036 and a further 1,000 thereafter, in the emerging Havant Borough Council Local Plan which will use Havant Road. It could be assumed that a significant proportion of those allocated for 2036 would be developed during the period ending 2030. See Annex B

**B. Inaccurate Information about traffic generated by LEOH Development**

4. Inappropriate use of residential traffic trip rates determined in 2014, thereby relying on a very outdated version of the calculation system and its 2005/7 surveys. That determination did not adequately consider the mixed tenure of the application site and its scale.
The determination of the traffic trip rates arising from this development is inappropriate. The application uses the trip rates for residential and employment land uses which were used in the original 2014 application. Those rates were derived from Version 7.1.1 of the TRICS (Trip Rate Information Computer System), and the reports from that system were generated on 16th April 2014. In contrast, this application uses Version 7.5.2 of TRICS to determine trip rates for the primary school, and the report was generated on 4th September 2018. No Trip Rates from TRICS Version 7.5.2 are presented for other land uses.

The 2014 application derived Trip Rates (per residential dwelling) from TRICS (7.1.1) by using the following selection parameters:

- One-day manual surveys undertaken in East Midlands (one site in Lincoln for 150 dwellings (survey Tuesday 15th May 2007), another in Lincoln for 186 dwellings (Monday 14th May 2007)) and West Midlands (a site in Bromsgrove for 232 dwellings (Thursday 30th June 2005))

- Only privately owned housing was considered and, according to the 2014 Transport Assessment, this parameter applies to sites where at least 75% of the units are privately owned. EHDC policy is for 40% of housing to be ‘affordable’ (non-private) so only 60% of the housing on this site should be privately owned. The land use of ‘Mixed private/non-private housing’ was not considered in this selection.

- A range of 150 to 500 units, but there were 700 units in the 2014 proposal

- Public Transport provision within the period 01/01/2005 to 20/072008 was considered

- No sites in the South East (which includes Hampshire) were considered

The Trip Rates (for the primary school) used in this application (TRICS Version 7.5.2) were derived from one-day manual surveys undertaken in North Lincolnshire (Scunthorpe (147 pupils – survey 20th May 2014), North West (Blackburn(472 pupils) – survey 28th September 2016 and Liverpool (264 pupils – survey 13th June 2013), Wales (Merthyr Tydfil (184 pupils – survey 18th October 2013) Public Transport provision within the period 01/01/10 to 04/09/18 was considered.

New versions of TRICS are released every 3 months, and version 7.5.2 was the most recent version when this application was submitted. The TRICS Good Practice Guide (2016) states in paragraph 2.2: ‘Between updates, new data is added, and from time to time, some sites are removed from the system due to issues with data, or moved from one land use category to another (due to re-classification).’ It is unreliable to aggregate the numbers of trips derived from trip rates obtained from these two different versions of TRICS.

The Version 7.1.1 Trip Rates are used in this application to compare the number of trips arising from 700 dwellings in the previous application, with those arising from the 800 dwellings in this application, but they are also used to estimate the growth in traffic flow arising from this proposed development.
It is more important for the proposed highways improvements to be based on increases in traffic flow calculated from the latest version of TRICS and for all land uses to use the same version. This would provide consistent and up-to-date measurements of traffic flow. The ‘TRICS Good Practice Guide (2016)’ states in paragraph 2.2: ‘There is no set rule against using an earlier version of the system. However, users should always aim to use the most up to date version’ Hampshire County Council is one of six county councils who are members of the TRICS Consortium.

The Trip Rates should be derived from developments which have a number of dwellings and tenure similar to those proposed in this application in order to avoid inaccuracies which may arise from any lack of scalability from data derived from smaller sites. Sites in the South East (which includes Hampshire) should also be considered as they have been in Transport Assessments for other applications in the vicinity of this site.

a. Paragraph 5.15 of the ‘Environmental Statement – Technical Appendix J: Transport Assessment’ states:
‘As part of the Transport Assessment scoping discussions HCC stated a preference to minimize the trip rates that were presented in the 2014 Transport Assessment prepared by WYG. Inconsistencies in the presentation of trip rates has been identified in this report with the actual trip rates identified as those that are provided in Appendix G of the 2014 Transport Assessment’

b. Appendix G of the 2014 Transport Assessment used version 7.1.1 of the TRICS database and did not provide any statistics for ‘Education’ Land Use. The Trip Rates for privately owned residential houses were derived from the sites relating to the selected parameters. These sites are:
- 150 dwellings at Bracebridge, Lincoln
  Survey date: 15/05/07 Survey Type: Manual
- 186 Mixed dwellings at Hykeham Road, Lincoln
  Survey date: 14/05/07 Survey Type: Manual
- 232 Detached/Terraced dwellings at St. Godwalds Road, Aston Fields, Bromsgrove
  Survey date: 30/06/05 Survey Type: Manual

c. Paragraph 5.2 of the ‘Environmental Statement – Technical Appendix J: Transport Assessment’ states:

‘A TRICS assessment has been undertaken using version 7.5.2 of the database for the land use category ’04 – Education, Primary School’.


The Trip Rates were derived from the sites relating to the selected parameters. These sites are for primary schools at the following addresses:
Newton Street, Blackburn
Total Number of pupils: 472
Survey date: 28/09/16 Survey Type: Manual

Booker Avenue, Alverton, Liverpool
Total Number of pupils: 264
Survey date: 13/06/13 Survey Type: Manual

Brecon Road, Merthyr Tydfil
Total Number of pupils: 184
Survey date: 18/10/13 Survey Type: Manual

Sunningdale Road, Scunthorpe
Total Number of pupils: 147 Survey date: 20/05/14 Survey Type: Manual

e. Table 5.2 of the ‘Environmental Statement – Technical Appendix J: Transport Assessment’ compares the number of trips arising from 700 dwellings with those for 800 dwellings.

f. Paragraph 6.4 of the Transport Assessment submitted in 2014 states:

‘TRICS Land Use Category ’03 – Residential / A – Houses Privately Owned’ was used for the residential element of the Proposed Development and includes “housing developments where at least 75% of units are privately owned”.

5. 25% of the residential trips from the development will use the B2149 Havant Road South of Pyle Lane at peak times to reach Havant. A further 3% would arise from journeys to Rowlands Castle or Havant railways stations to reach London. This will result in an increase at peak times of 20% in south-bound traffic on that road. The application distributed only 16% of the additional traffic to Havant Road (South). There will be an increase in trips on Rowlands Castle Road of 7% and not 0% as stated in the application.

The application distributes additional trips around the highway network, by using 2011 Census data relating to the origin of current work-related trips in the electoral Wards of Horndean Hazelton and Blendworth, and Rowlands Castle, where the site is located. The Census data shows that residents of those Wards had Places of Work in 43 areas in the South East and in 18 areas of London, and indicates the number of trips made to each of those Places of Work.
For trips within the South East, 25% were to Havant, 22% to Portsmouth, 21% to East Hampshire, and 7% to Chichester. Of the other 39 areas, none had more than 6% of the total number of trips.

Using this data, and for the purposes of this application, it must be assumed that at least 25% of the residential traffic from the application site would travel southwards along the B2149 Havant Road, and that the 7% would use Rowlands Castle Road. It is very possible that traffic to Places of Work in the South East other than Havant, would also travel southwards along Havant Road, to, for example, join the B2148 (Whichers Gate Road), and travel eastwards along Emsworth Common Road.

3% of the total number of trips in the Census data were to 17 areas in London, and it could be reasonably assumed that these would be made by rail. These journeys would start from Rowlands Castle or Havant railways stations to reach London. Havant railway station would be reached by travelling south on Havant Road, and Rowlands Castle station by also travelling south and joining Castle Road, or by using Rowlands Castle Road. It is likely that some of the trips to other areas in the South East would also be by rail from Rowlands Castle or Havant stations.

a. The ‘Environmental Statement – Technical Appendix J: Transport Assessment’ states:

5.22 Information to estimate the trip distribution has been obtained by using the 2011 ‘Location of Usual Residence and Place of Work (WF01BEW)’ Census data from the website www.nomisweb.co.uk (supplied by the Office of National Statistics).

5.23 The Census Super Output Area East Hampshire 016 (E02006829) which encompasses the site was set as being the place of residence i.e. the origin of work-related trips. The destination of work-related trips was set at the Super Output Area Mid Layer level for those travelling to work within East Hampshire and neighbouring Havant administrative areas but at Local Authority level for those travelling to destinations located further afield.

5.24 The resultant trips were combined as a total and distributed to the various routes connecting the site to the identified workplace destinations. This exercise was completed by identifying the most likely and / or direct route. The distribution identified is as follows:

- A3 Portsmouth Road (W) 1%;
- A3 (M) North 22%;
- A3 London Road (E) 0%;
- Blendworth Road (E) 0%;
- Rowlands Castle Road (E) 0%;
- B2149 Havant Road (S) 16%;
- A3 (M) South (51%); and
- B2149 Dell Piece Drive (W) 9%.

5.25 The above illustrates that the majority of the existing residents of Horndean commute towards Portsmouth and Havant primarily using the A3 (M) and Havant Road. The residential trip distribution and trip assignment for 800 dwellings diagrams are provided in Appendix G.
b. The spreadsheet ‘Residential work-related trips to the South East and London by residents of Rowlands Castle Ward and Horndean Hazelton and Blendworth Ward on 2011 Census day’ uses the same Census dataset ‘Location of Usual Residence and Place of Work (WF01BEW)’ to consider the current residences and places of work as follows:

**Ward of current residents (origin of work-related trips)**

The Census Super Output Area Mid Layer East Hampshire 016 (E02006829) which includes the Horndean Hazelton and Blendworth Ward, and Rowlands Castle Ward, was used to determine ‘Usual Residence’.

**Places of work (destination of work-related trips)**

To obtain this information, all areas in the South East and London for ‘Merged Local Authority Districts’ were selected

6. Incorrect implication that the part of Havant Road south of the development will not experience an increase in AM and PM peak flows of greater than 10% and that therefore it is not considered in the environmental assessment. The increases in the AM and PM peak flows will be 11.9% and 11.5% respectively.

The 2018 Survey Flows and the 2030 Base + Total Development (800 units) + Total Committed Development show that on the part of Havant Road south of Access C, there would be a total increase of 11.9% in the morning peak, and 11.5% in the afternoon peak. This does not consider the increases arising from the committed developments and allocated sites referred to above.

a. Paragraph 11.59 of the ‘Traffic and Transport Environmental Statement’ states: ‘In accordance with the guidance set out in paragraphs 11.21 and 11.22, links 1, 2, 5, 6, 7, 8, 9 and 10 are not considered further in this part of the assessment because the predicted changes in traffic flows are less than 10%. Link 3 (B2149 Havant Road, south of Dell Piece East) is predicted to experience an increase of 26%, while link 4 (B2149 Dell Piece East) is predicted to experience an increase of 20%. These links are also the only ones that will experience an increase in AM and PM peak flows of greater than 10%, with link 3 predicted to have increases of 36% in the AM peak and 33% in the PM peak and link 4 predicted to have increases of 28% in the AM peak and 27% in the PM peak.’

b. The table below shows data from Appendix I (Traffic Flow diagrams – Baseline 2018 and 2030 scenarios) of the ‘Environmental Statement – Technical Appendix J: Transport Assessment’

<table>
<thead>
<tr>
<th></th>
<th>2018 Survey Flows 2030 base + Total Development flows (800 units) + Total Committed Development Increase</th>
<th>2018 Survery Flows 2030 base + Total Development flows (800 units) + Total Committed Development Increase</th>
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<tbody>
<tr>
<td>Morning Peak</td>
<td>South 702 799 13.8% North 723 796 10.1% Total 1,425 1,595 11.9% Afternoon Peak: South 784 865 10.3% North 799 900 12.6% Total 1,583 1,765 11.5%</td>
<td>Appendix I – Traffic Flow diagrams – Baseline 2018 and 2030 scenarios</td>
</tr>
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</table>
7. No mitigation proposed for the increase in traffic that will cause the Mini-roundabouts at the junction of Manor Lodge Road, Durrants Road, Whichers Gate Road and Redhill Road, to be overloaded.

No assessment is made of the capacity of these mini-roundabouts which will be overloaded (based on Ratio of Flow to Capacity) in 2030 even without assessing the additional traffic arising from the developments already under construction, committed developments and allocated sites referred to above that have not been considered in this application. No mitigation is proposed.

a. The Transport Assessment (2014) for the Land South of Oaklands House development in paragraph 6.14 contains Table 6.6 which shows the Junction Modelling for 2019 of the mini-roundabouts at the junction of Manor Lodge Road, Whichers Gate Road, Durrants Road and Redhill Road. The table below shows the Ratio of Flow to Capacity (RFC) modelled for 2019 for the Mini-roundabout junction of Manor Lodge Road which is a continuation of Havant Road. The increase in traffic flows referred to above is used to give an indication of the likely RFC in 2030.

**Ratio of Flow to Capacity (RFC) of Manor Lodge Road mini-roundabout junction**

b. Paragraph 7.6 of the ‘Environmental Statement – Technical Appendix J: Transport Assessment’ states:

‘RFC values between 0.00 and 0.85 indicate good operating conditions, values between 0.85 and 1.00 represent variable operation (i.e. queues building at the junction resulting in increased vehicle delay moving through the junction). RFC values in excess of 1.00 represent overloaded conditions.

8. No assessment of impact of increased traffic on the junction of Havant Road and Castle Road.

Some traffic from the proposed new development would be very likely to use Castle Road to access the Rowlands Castle railway station, the Rowlands Castle GP surgery, and places such as Chichester which are further to the east. Vehicles are parked along most of the length of this road, making it very difficult for other vehicles to pass along it. Any increase would exacerbate this problem. The junction from Castle Road to Havant road already presents safety issues. No mitigation is proposed.

9. No assessment of the impact of increased traffic on the junction of Manor Lodge Road (a continuation of Havant Road) and Mallard Road that already experiences delays and queuing at peak times. It is the only exit for the 160 dwellings in the Kings Meadow Estate.

A traffic count undertaken by Rowlands Castle Parish Council, and observations by residents of the Kings Meadow estate show that during the morning peak hour vehicles can queue up waiting to join Manor Lodge Road from Mallard Road, particularly when drivers have to turn right and require co-incident gaps in the traffic heading north and south. This can result in delays of several minutes for each vehicle with a consequent increase in pollution from cold,
idling engines. These delays will increase as a result of the increase in traffic on Havant Road at peak times referred to above. No mitigation is proposed.

10. Gross underestimate of the increase in traffic on Rowlands Castle Road

The submission is that the 800 dwellings would result in only one additional vehicle travelling eastward along Rowlands Castle Road in the morning peak hour, and in only five additional vehicles travelling northward along Havant Road from its junction with Dell Piece East.

Rowlands Castle Road is already a well-established route for traffic driving towards Chichester and further east. At present, as shown in the submission, during the morning peak hour 135 Passenger Car Units (‘vehicles’) travel eastward along Rowlands Castle Road. 38 of these (28%) join Rowlands Castle Road having driven northwards along Havant Road from its junction with Dell Piece East (Junction 2).

Of the traffic currently approaching Junction 2 from the west, 25% turns northwards onto Havant Road. Of the traffic approaching Junction 2 from the south, 21% continues northwards along Havant Road. 12% of the traffic travelling northwards on Havant Road from Junction 2 turns into Rowlands Castle Road. This indicates that a significant number of vehicles travelling from outside the area of this site use Rowlands Castle Road. It should be assumed that because this site is very close to Rowlands Castle Road, a greater proportion of its residents would use Rowlands Castle Road.

The distance by road from the Havant Road/Dell Piece junction to Chichester via Rowlands Castle Road is approximately 3 miles shorter than the route southwards along Havant Road and to the A27. Therefore, it is very likely to be an attractive route for residents of the development.

Rowlands Castle Road would also be used by residents travelling to Rowlands Castle Railway Station.

Additional traffic using Rowlands Castle Road to travel eastward towards Chichester would exacerbate the existing problems in Rowlands Castle at the junction of Bowes Hill, Finchdean Road, Woodberry Lane and The Green. The double arch railway bridge severely restricts visibility at the junction.

a. Appendix I – Traffic Flow Diagrams and Appendix G – Traffic Flow Diagrams – Development Trip Distribution in the ‘Environmental Statement – Technical Appendix J: Transport Assessment’ show the increase in residential traffic in the AM peak using Rowlands Castle Road and Havant Road:
b. Appendix I – Traffic Flow Diagrams in ‘Environmental Statement – Technical Appendix J: Transport Assessment’ gives the following 2018 AM Peak survey data for traffic using Rowlands Castle Road:

2018 AM Peak Survey Flows - Appendix I - Traffic Flow Diagrams

c. Appendix I – Traffic Flow Diagrams in ‘Environmental Statement – Technical Appendix J: Transport Assessment’ gives the following 2018 AM Peak survey data for traffic travelling northwards from Junction 2:

Traffic from the west and the south travelling northwards at Junction 2 (Dell Piece East and Havant Road) - Appendix I - Traffic Flow Diagrams - 2018 AM Survey

C. No recognition of impact of travelling to local facilities in Rowlands Castle

11. No recognition that the entire application site is within the catchment area of the Rowlands Castle GP Surgery that will probably require residents of the application site to drive into the centre of the Rowlands Castle village, which has very limited parking facilities. Paragraph 2.27 (Table 2.2) of the ‘Environmental Statement – Technical Appendix J: Transport Assessment’ does not refer to the Rowlands Castle GP surgery.

12. No recognition that approximately 40% of the area south-west of Havant Road is within the catchment area of the Rowlands Castle St. John’s Church of England Controlled Primary School.

There are no pedestrian links from the site to this school, so it would be necessary for children to be transported by car to the school which has few parking spaces and where dropping off and picking of pupils is already problematic, with some congestion occurring. Site access C would be used to travel to and from this school.

Paragraph 2.27 (Table 2.2) of the ‘Environmental Statement – Technical Appendix J: Transport Assessment’ does not refer to this school

D. Road layout

13. Site accesses B and C should have ‘ghost islands’ and not be simple priority junctions. In addition to serving the stated 104 dwellings, access C will be used by school traffic and other areas of the site.
To enable vehicles to safely and promptly leave the site and travel southwards, and to enter the site when travelling from the north, these accesses should have a ‘Ghost’ island or roundabout. See NPPF paragraph 108. There is a ‘Ghost’ island at the junction of Mallard Road and Manor Lodge Road which provides access to a similar number of dwellings in the Kings Meadow estate, to the number of dwellings served by Access C. This existing ‘Ghost’ island has proved very necessary.

a. Paragraph 7.32 of the ‘Environmental Statement – Technical Appendix J: Transport Assessment’ states:

‘The access (C) to 104 dwellings is proposed to be taken from Havant Road South.’

b. The ‘Ghost’ island at the junction of Mallard Road and Manor Lodge Road provides access to the following roads serving 160 dwellings in the Kings Meadow estate: Mallard Road, Brambling Road, Nuthatch Close, Blackcap Close, Dunnock Close, Kingfisher Close, Hazeldean Court.

14. No consideration is given to the likely increased use of Pyle Lane as a ‘short cut’ from Havant Road to Rowlands Castle Road in the vicinity of the site. At the junction of Pyle Lane and Rowlands Castle Road there is a blind bend with limited visibility

E. Other issues

15. Non-compliance with EHDC Local Plan (2014) policy CP31 because no proposals are made to improve access to and parking at, or adjacent to, Rowlands Castle railway station.

a. Paragraph 2.21 of ‘Environmental Statement – Technical Appendix J: Transport Assessment’ states:

‘The nearest railway station is Rowlands Castle located circa 3.0km south east of the site. This distance can be travelled by car or by cycling (circa 12 minutes – based on the average cycling speed of 4.2m/s) as part of a multi-modal journey. The station provides 26 car parking spaces and four-cycle parking spaces’.

b. During working days all parking places are generally full before the 6.45am train service to London (Waterloo) leaves, so it would not be able to accommodate any additional vehicles that may be driven from the proposed development.

c. Paragraph 3.19 refers to EHDC Local Plan Policy CP31 which states:

‘Development proposals are required to include a number of mitigation measures to reduce its impact in the local highway network. These include:
……improvements to the access to rail stations at Rowlands Castle, Petersfield, Liss, Liphook, Alton and Bentley Station by sustainable modes of transport and, where appropriate, provide additional car and cycle parking at rail stations;’
d. Table 11.6 in the ‘Traffic and Transport Environmental Statement’ shows that the proposed development would not result in any increase in traffic along 'Link Reference 1 (Rowlands Castle Road, east of Idsworth Close)'. This indicates an unstated assumption that any vehicles travelling from the development to Rowlands Castle railway station would do so along the Havant Road-Castle Road-Redhill Road-The Green-Bowes Hill route, which is already congested during morning and evening peak times.

e. This development proposal does not include any of the mitigation measures required for Rowlands Castle railway station by EHDC Policy CP31, and so does not demonstrate compliance with that policy.

16. No consideration of the cumulative impact of construction traffic arising from the possible development of the Havant Thicket Reservoir, which could be taking place while this site is developed.

The Havant Borough Council Local Plan (2011) allocates this as a strategic site (reference 2) and one of the development requirements is that construction traffic should be minimized in Leigh Park, Rowlands Castle and other residential areas. This implies that the construction traffic would use the stretch of Havant Road north of the reservoir site adjacent to the Land East of Horndean site. We are reliably informed that a planning application for this site will be submitted in 2019, so if it were to be approved, construction would take place during the same period up to 2030 that the development on this application site would be underway.

17. There should be a permanent and enforceable planning requirement that the bus gate entrance onto Rowlands Castle Road should not be made available for a more general use by other vehicles. Otherwise, this would result in a very significant use of Rowlands Castle Road as a route for travelling eastwards.

Annex B

Route for traffic travelling northwards to connect with the B2149 Havant Road

Reference Site Name Number of Dwellings Traffic will join Bartons Road and take either the Petersfield Road (B2149)-Durrants Road-Manor Lodge Road-Havant Road or Comley Hill (B2148)-Whichers Gate Road-Manor Lodge Road-Havant Road Up to 2036KS5Southleigh 1,1002037 onwardsKS5Southleigh 1,000Southleigh Road (East of Horndean Road) - Horndean Road (B2148)-Comley Hill-Whichers Gate Road- Manor Lodge RoadH6 Land North of Long Copse Lane260H21Land West of Havant Crematorium90H17Land South of Bartons Road175H18Portsmouth Water HQ120H25Southleigh Park House35H27Helmsley House15H35Former Colt Site - New Lane90H07Former Wessex Site - New Lane41UE33Eastleigh House, Bartons Road8H11North Street Gas Site15H12Former Victoria Cottage Hospital15Total of Other Sites864Total of Southleigh (up to 2036) and Other Sites1,964Total of Southleigh (2037 onwards) and Other Sites2,964North Street, Emsworth - Horndean Road (B2148)-Comley Hill-Whichers Gate Road-Manor Lodge RoadHavant Borough Council Local Plan (2036) - (Emerging)Number of dwellings in sites north of the A259, allocated in the emerging Havant Borough Council Local Plan (2036), that will use the B2149 Havant Road as the shortest
route to connect with the A3(M)Joining Bartons Road and taking either the Petersfield Road (B2149)-Durrants Road -Manor Lodge Road-Havant Road, or Comley Hill (B2148)-Whichers Gate Road-Manor Lodge RoadSouthleigh Strategic Site:Other

**Report by Rowlands Castle Parish Council on the (unreserved) matters of the means of access to the highway network (junction arrangements) and associated highway improvements**

This Report provides supporting detail and arguments to the comments in Rowlands Castle Parish Council's (RCPC) letter of objection to this Application dated 24 Jan 2019.

Annex A provides the paragraphs of the Environmental Statement - Traffic and Transport ('the Statement') and 'Environmental Statement – Technical Appendix J: Transport Assessment' ('the TA') on which these comments are based. Annex B gives details of the sites allocated in the emerging Havant Borough Council Local Plan which will use Havant Road via Junction 2 to connect with the A3(M). This is in the form of a spreadsheet containing details of residential work-related trips to the South East and London by residents of Rowlands Castle Ward and Horndean Hazeldon and Blendworth Ward on 2011 Census day.

**A. Omission of, or Inaccurate Information on, the cumulative impact of current and committed developments and allocated sites in the area**

1. Incorrect claims that the Land South of Oaklands House development (106 dwellings) was largely complete and that its traffic was recorded by the traffic surveys. No dwellings were occupied at that time.

   The traffic survey was undertaken between 27th June and 3rd July 2018. Minutes of the EHDC Developer Liaison meeting for this site on 18th June 2018 show that the first occupation was expected in the first week of July 2018 and the minutes for 13th November show that 10 dwellings had been occupied. See Annex A section 1.

2. No assessment of growth in traffic from 80 dwellings under construction in Rowlands Castle, none of which were occupied when the traffic survey was undertaken. There is also a site allocated for 10 dwellings.

   These developments are within 0.5 miles of the application site and the only committed development considered is at Woodcroft Farm in Waterlooville which is about 1.5 miles by road to the west of site Access A (Dell Piece East Roundabout). See Annex A section 2.

3. No assessment of the impact from traffic from dwellings under construction and allocated sites in nearby areas of the Havant Borough which will use Havant Road to connect with the A3(M)
Although the application states that the B2149 Havant Road connects the A3(M) to the north and Havant and Emsworth to the south, it does not assess the growth in traffic along that road arising from committed developments and allocations in those areas which are within the Havant Borough but within 2.5 miles of the southern boundary of the application site.

Traffic from these areas will connect with the Havant Road via Whichers Gate Road or Durrants Road which connect at a mini-roundabout junction to Manor Lodge Road, a continuation of Havant Road.

The application uses the National Trip End Model for all road types to derive background growth factors for the AM and PM peak hours only for East Hampshire. The stated growth rates between 2018 and 2030 for AM Peak (1.0619) and PM Peak (1.0568) would not reflect the cumulative impact of traffic from these developments.

The following sentences give more details of these developments and allocations for which no assessment has been made:

3.1 Committed developments for **300** dwellings within 2.5 miles of the southern boundary of the application site for which no assessment has been made. All of these are under construction but were not occupied in June 2018 when the traffic survey was carried out. See Annex A section 3.1

3.2 Site Allocations for **139** dwellings in the Havant Borough Council Local Plan (Allocations) (July 2014) covering the period up to 2026 which is included within the period of this application which assumes development would take place from 2020 to 2030. No assessment has been made. See Annex A section 3.2

3.3 Sites allocated for **2,400** dwellings up to 2036 and a further **1,000** thereafter, in the emerging Havant Borough Council Local Plan which will use Havant Road. It could be assumed that a significant proportion of those allocated for 2036 would be developed during the period ending 2030. See Annex B.

**B. Inaccurate Information about traffic generated by LEOH Development**

4. Inappropriate use of residential traffic trip rates determined in 2014, thereby relying on a very outdated version of the calculation system and its 2005/7 surveys. That determination did not adequately consider the mixed tenure of the Application site and its scale.

The determination of the traffic trip rates arising from this development is inappropriate. The Application uses the trip rates for residential and employment land uses which were used in the original 2014 Application for the site. Those rates were derived from Version 7.1.1 of the TRICS (Trip Rate Information Computer System), and the reports from that system were generated on 16th April 2014. In contrast, this Application uses Version 7.5.2 of TRICS to determine trip rates for the primary school, and the report was generated on 4th September 2018. No Trip Rates from TRICS Version 7.5.2 are presented for other land uses.
The 2014 Application derived Trip Rates (per residential dwelling) from TRICS (7.1.1) by using the following selection parameters:

- One-day manual surveys undertaken in East Midlands (one site in Lincoln for 150 dwellings (survey Tuesday 15th May 2007), another in Lincoln for 186 dwellings (Monday 14th May 2007)) and West Midlands (a site in Bromsgrove for 232 dwellings (Thursday 30th June 2005))

- Only privately owned housing was considered and, according to the 2014 Transport Assessment, this parameter applies to sites where at least 75% of the units are privately owned. EHDC policy is for 40% of housing to be ‘affordable’ (non-private) so only 60% of the housing on this site should be privately owned. The land use of ‘Mixed private/non-private housing’ was not considered in this selection.

- A range of 150 to 500 units, but there were 700 units in the 2014 proposal

- Public Transport provision within the period 01/01/2005 to 20/07/2008 was considered

- No sites in the South East (which includes Hampshire) were considered

The Trip Rates (for the primary school) used in this Application (TRICS Version 7.5.2) were derived from one-day manual surveys undertaken in North Lincolnshire (Scunthorpe (147 pupils – survey 20th May 2014), North West (Blackburn (472 pupils) – survey 28th September 2016 and Liverpool (264 pupils – survey 13th June 2013), Wales (Merthyr Tydfil (184 pupils – survey 18th October 2013) Public Transport provision within the period 01/01/10 to 04/09/18 was considered.

New versions of TRICS are released every 3 months, and version 7.5.2 was the most recent version when this Application was submitted. The TRICS Good Practice Guide (2016) states in paragraph 2.2: ‘Between updates, new data is added, and from time to time, some sites are removed from the system due to issues with data, or moved from one land use category to another (due to re-classification).’

It is unreliable to aggregate the numbers of trips derived from trip rates obtained from these two different versions of TRICS.

The Version 7.1.1 Trip Rates are used in this Application to compare the number of trips arising from 700 dwellings in the previous application, with those arising from the 800 dwellings in this application, but they are also used to estimate the growth in traffic flow arising from this proposed development.

It is more important for the proposed highways improvements to be based on increases in traffic flow calculated from the latest version of TRICS and for all land uses to use the same version. This would provide consistent and up-to-date measurements of traffic flow. The ‘TRICS Good Practice Guide (2016)’ states in paragraph 2.2: ‘There is no set rule against using an earlier version of the system. However, users should always aim to use the most up to date version’. Hampshire County Council is one of six county councils which are members of the TRICS Consortium.
The Trip Rates should be derived from developments which have a number of dwellings and tenure similar to those proposed in this application in order to avoid inaccuracies which may arise from any lack of scalability from data derived from smaller sites. Sites in the South East (which includes Hampshire) should also be considered as they have been in transport assessments for other applications in the vicinity of this site. See Annex A section 4.

5. 25% of the residential trips from the development will use the B2149 Havant Road South of Pyle Lane at peak times to reach Havant. A further 3% would arise from journeys to Rowlands Castle or Havant railways stations to reach London. This will result in an increase at peak times of 20% in south-bound traffic on that road. The Application distributed only 16% of the additional traffic to Havant Road (South). There will be an increase in trips on Rowlands Castle Road of 7% and not 0% as stated in the Application.

The Application distributes additional trips around the highway network, by using 2011 Census data relating to the origin of current work-related trips in the electoral Wards of Horndean Hazelton and Blendworth, and Rowlands Castle, where the site is located. The Census data shows that residents of those Wards had Places of Work in 43 areas in the South East and in 18 areas of London, and indicates the number of trips made to each of those Places of Work.

For trips within the South East, 25% were to Havant, 22% to Portsmouth, 21% to East Hampshire, and 7% to Chichester. Of the other 39 areas, none had more than 6% of the total number of trips.

Using this data, and for the purposes of this Application, it must be assumed that at least 25% of the residential traffic from the application site would travel southwards along the B2149 Havant Road, and that the 7% would use Rowlands Castle Road.

It is very possible that traffic to Places of Work in the South East other than Havant, would also travel southwards along Havant Road, to, for example, join the B2148 (Whichers Gate Road), and travel eastwards along Emsworth Common Road. 3% of the total number of trips in the Census data were to 17 areas in London, and it could be reasonably assumed that these would be made by rail. These journeys would start from Rowlands Castle or Havant railways stations to reach London. Havant railway station would be reached by travelling south on Havant Road, and Rowlands Castle station by also travelling south and joining Castle Road, or by using Rowlands Castle Road. It is likely that some of the trips to other areas in the South East would also be by rail from Rowlands Castle or Havant stations. See Annex A section 5 and

Annex B.

6. It is incorrectly implied that the part of Havant Road south of the development will not experience an increase in AM and PM peak flows of greater than 10% and that therefore it is not considered. The increases in the AM and PM peak flows will be 11.9% and 11.5% respectively.
The 2018 Survey Flows and the 2030 Base + Total Development (800 units) + Total Committed Development show that on the part of Havant Road south of Access C, there would be a total increase of 11.9% in the morning peak, and 11.5% in the afternoon peak. This does not consider the increases arising from the committed developments and allocated sites referred to above. See Annex A section 6.

7. There is no mitigation proposed for the increase in traffic that will cause the mini-roundabouts at the junction of Manor Lodge Road, Durrants Road, Whichers Gate Road and Redhill Road, to be overloaded.

No assessment is made of the capacity of these mini-roundabouts which will be overloaded (based on Ratio of Flow to Capacity) in 2030 even without assessing the additional traffic arising from the developments already under construction, committed developments and allocated sites referred to above that have not been considered in this Application. No mitigation is proposed. See Annex A section 7.

8. There is no assessment of the impact of increased traffic on the junction of Havant Road and Castle Road. Some traffic from the proposed new development would be very likely to use Castle Road to access the Rowlands Castle railway station, the Rowlands Castle GP surgery, and places such as Chichester which are further to the east. Vehicles are parked along most of the length of this road, making it very difficult for other vehicles to pass along it. Any increase would exacerbate this problem. The junction from Castle Road to Havant Road already presents safety issues. No mitigation is proposed.

9. There is no assessment of the impact of increased traffic on the junction of Manor Lodge Road (a continuation of Havant Road) and Mallard Road that already experiences delays and queuing at peak times. It is the only exit for the 160 dwellings in the Kings Meadow Estate. See Annex A section 9.

10. There is a gross underestimate of the increase in traffic on Rowlands Castle Road

The submission is that the 800 dwellings would result in only one additional vehicle travelling eastward along Rowlands Castle Road in the morning peak hour, and in only five additional vehicles travelling northward along Havant Road from its junction with Dell Piece East.

Rowlands Castle Road is already a well-established route for traffic driving towards Chichester and further east. At present, as shown in the submission, during the morning peak hour 135 Passenger Car Units (‘vehicles’) travel eastward along Rowlands Castle Road. 38 of these (28%) join Rowlands Castle Road having driven northwards along Havant Road from its junction with Dell Piece East (Junction 2).
Of the traffic currently approaching Junction 2 from the west, 25% turns northwards onto Havant Road. Of the traffic approaching Junction 2 from the south, 21% continues northwards along Havant Road. 12% of the traffic travelling northwards on Havant Road from Junction 2 turns into Rowlands Castle Road. This indicates that a significant number of vehicles travelling from outside the area of this site use Rowlands Castle Road. It should be assumed that because this site is very close to Rowlands Castle Road, a greater proportion of its residents would use Rowlands Castle Road.

The distance by road from the Havant Road/Dell Piece junction to Chichester via Rowlands Castle Road is approximately 3 miles shorter than the route southwards along Havant Road and to the A27. Therefore, it is very likely to be an attractive route for residents of the development.

Rowlands Castle Road would also be used by residents travelling to Rowlands Castle Railway Station.

Additional traffic using Rowlands Castle Road to travel eastward towards Chichester would exacerbate the existing problems in Rowlands Castle at the junction of Bowes Hill, Finchdean Road, Woodberry Lane and The Green. The double arch railway bridge severely restricts visibility at the junction. See Annex A section 10

C. No recognition of impact of travelling to local facilities in Rowlands Castle

11. There is no recognition that the entire Application site is within the catchment area of the Rowlands Castle GP Surgery that will probably require residents of the application site to drive into the centre of the Rowlands Castle village, which has very limited parking facilities. See Annex A section 11.

12. There is no recognition that approximately 40% of the area south-west of Havant Road is within the catchment area of the Rowlands Castle St. John’s Church of England Controlled Primary School.

There are no pedestrian links from the site to this school, so it would be necessary for children to be transported by car to the school which has few parking spaces and where dropping off and picking of pupils is already problematic, with some congestion occurring. Site access C would be used to travel to and from this school. See Annex section 12.

D. Road layout

13. Site accesses B and C should have ‘ghost islands’ and not be simple priority junctions. In addition to serving the stated 104 dwellings, access C will be used by school traffic and other areas of the site.
To enable vehicles to safely and promptly leave the site and travel southwards, and to enter the site when travelling from the north, these accesses should have a ‘ghost’ island or roundabout. See NPPF paragraph 108. There is a ‘ghost’ island at the junction of Mallard Road and Manor Lodge Road which provides access to a similar number of dwellings in the Kings Meadow estate, to the number of dwellings served by Access C. This existing ‘ghost’ island has proved very necessary. See Annex A section 13.

14. No consideration is given to the likely increased use of Pyle Lane as a ‘short cut’ from Havant Road to Rowlands Castle Road in the vicinity of the site. At the junction of Pyle Lane and Rowlands Castle Road there is a blind bend with limited visibility.

E. Other issues

15. Non-compliance with EHDC Local Plan (2014) policy CP31 because no proposals are made to improve access to and parking at, or adjacent to, Rowlands Castle railway station. See Annex A section 15.

16. There is no consideration of the cumulative impact of construction traffic arising from the possible development of the Havant Thicket Reservoir, which could be taking place while this site is developed. The Havant Borough Council Local Plan (2011) allocates this as a strategic site (reference 2) and one of the development requirements is that construction traffic should be minimised in Leigh Park, Rowlands Castle and other residential areas. This implies that the construction traffic would use the stretch of Havant Road north of the reservoir site adjacent to the Land East of Horndean site. RCPC is reliably informed that a planning application for this site will be submitted in 2019, so if it were to be approved, construction would take place during the same period up to 2030 that the development on this Application site would be underway.

17. There should be a permanent and enforceable planning requirement that the bus gate entrance onto Rowlands Castle Road should not be made available for a more general use by other vehicles. Otherwise, this would result in a very significant use of Rowlands Castle Road as a route for travelling eastwards.

18. RCPC would normally expect an Application of this scale and nature to include substantial transport-related documentation in the form of a named Transport Assessment or Statement to justify the proposals therein. In RCPC’s opinion, neither The Environmental Statement - Traffic and Transport nor Environmental Statement Appendix J Part 1, constitute an appropriate level of examination and evidence to support the sizeable proposals in the Application.

There is a lack of clarity about the purpose and scope of this Application. Whilst it is listed as an Outline Planning Application, many of the accompanying documents are titled or prefaced as “environmental statements”. RCPC concludes this stems from a preceding Application for the site (Ref: 55562/004) which concerned a Request for Environmental Impact Assessment Scoping Opinion on a “residential development for about 700 dwellings, a care village ….” etc. In response to that previous application, EHDC agreed a scope for an Environmental
Statement which was to include only the Land South of Oaklands House development in Rowlands Castle (Ref 30016/026).

The Applicant now appears to have taken that agreed scope and applied it to this Application, which is for something different ie residential development of 800 dwellings with no care village included. This scope has also been extended to the TA.

Neither the Statement nor the TA is adequate for a comprehensive Transport Assessment which should cover all matters related to the “means of access to the highway network (junction arrangements) and associated highway improvements” as described in the title of the Application.

RCPC also notes that Highways England initially recommended objecting to this Application because it could not find a Transport Assessment on EHDC’s website. Highways England later commented that another organisation had assisted it in tracing the required information. It begs the question, how many other consultees were unable to trace this vital information?

06/09/19

Further Comments by Rowlands Castle Parish Council (RCPC) to Applicant’s Response on RCPC’s previous Comments on Application Ref 55562/005

EHDC Planning Application Ref 55562/005 Notification of pre-decision Amendment: Outline planning application with all matters reserved, except the means of access to the highway network (junction arrangements) and associated highway improvements for residential-led (c3) mixed-use development of the site with up to 800 dwellings, up to 2ha of employment land etc. etc.

Amendment Details: Further technical information received from the applicant in respect of highways, biodiversity, drainage and noise matters) for Development of Land East of Horndean

Background

1. RCPC reviewed this Application on 7th January 2019 and unanimously resolved to OBJECT and submitted the following documents to EHDC:
   - Cover letter summarizing the 18 reasons for our objection
   - Accompanying Report providing more detail
   - 2 Supporting Annexes – A and B

2. All of RCPC’s objections related to highways matters.

3. In July 2019 the applicant provided a ‘Post-Application Technical Submission’ which aimed to address some of the key technical issues raised by consultees relating to the topics of:

   • Highways
• Biodiversity
• Drainage
• Noise

4. With regard to Highways, the applicant submitted a ‘Technical Note’ (about 300 pages) in response to comments made by HCC Highways in February 2019, and subsequent discussions between the two parties.

5. The Applicant also submitted a report commenting on each of the 18 objections in RCPC’s cover letter. This had to be read alongside the aforementioned ‘Technical Note’. For ease of reference, the text of the Applicant’s report is copied below in italics, to which RCPC has now added its further comments in bold, as agreed at its Meeting on 2nd September 2019.

Report of July 2019 by Applicant in response to RCPC’s Comments

Introduction

1. This note has been prepared to provide a response to consultation responses from Rowlands Castle Parish Council and Southern Councillors of Horndean and Rowlands Castle in respect of the planning application for the development at Land East of Horndean.

2. The comments raised by the consultees are set out in Bold Italic with a response provided after each in plain text.

Comments from Rowlands Castle Parish Council

RCPC 1. Incorrect claims that the Land South of Oaklands House development (106 dwellings) in Rowlands Castle was largely complete and that its traffic was recorded by the traffic surveys. No dwellings were occupied at that time.

3. Information provided at the time of preparing the Transport Assessment suggested that occupations of this development had commenced. Information since then has suggested that this may not have been the case.

4. The consideration of a number of development sites is set out in further technical responses to the highway authority, Hampshire County Council (HCC). Within those notes, the traffic volumes forecast through committed development is shown to be low and within the assumptions made through the application of Tempro (Trip End Model Presentation Program) growth factors. As such the cumulative impact of committed development such as Land South of Oaklands House has been accounted for within the Transport Assessment.

RCPC’s Further Comment:
The Transport Assessment for the Land South of Oaklands House contains development traffic flows in figures 5.1 and 5.2. These could be added to the traffic flows estimated for this Land East of Horndean application. The increase in traffic volumes in recent years across Britain’s highways has mostly been underestimated because new housing developments bring all sorts of additional traffic over and above the movement of vehicles owned by residents. The huge increase in deliveries of food and goods ordered on-line plus the requirements of residents to have cleaners, maintenance and other services all contribute to increased traffic on the arterial roads that service the new developments. It is the effect of increased traffic on these arterial routes (B roads and yellow roads in particular) in former countryside areas plus the impact of congestion at junctions and nodal points that is the key issue that must be considered.

RCPC 2. No assessment of growth in traffic from further 80 dwellings under construction in Rowlands Castle, none of which were occupied when the traffic survey was undertaken. There is also another site allocated for 10 dwellings.

5. As with comment 1, the further consideration of traffic associated with a range of development sites has been undertaken as part of an additional response to HCC and within the Transport Assessment through the application of Tempro derived growth factors.

RCPC’s Further Comment:

a. The ‘Technical Note’ and Transport Assessment do not refer to the following committed sites as having been considered. They are all within 0.5 miles of Havant Road:

- Keyline Builders’ Merchants, Redhill Road, Rowlands Castle (EHDC Reference: 23856/009) – 46 dwellings. This was under construction at the time of the traffic survey but no dwellings had been occupied.
- Land East of College Close (EHDC Reference: 55268) – 34 dwellings. This was also under construction at the time of the traffic survey but no dwellings had been occupied.
- Land South of Oaklands House (EHDC Reference: 30016/031) – 10 retirement bungalows. This site is not yet under construction.

b. The Transport Assessment (paragraph 6.8) states: ‘No additional committed developments have been identified within the TEMPRO area, and that as such, the forecast increase in households and jobs are likely to be associated with the application / allocation site’. This implies that the growth factors do not consider the three sites listed above and the Land South of Oaklands House developments.

c. It is noted that with regards to this matter, the ‘Technical Note’ states on page 22: ‘Position 2.82 - HCC to review and confirm position regarding the application of background growth and committed development flows.’
RCPC 3. No assessment of the impact of traffic from dwellings under construction and allocated sites in nearby areas of Havant Borough which will use Havant Road to connect with the A3(M):

3.1. 300 dwellings under construction,

3.2 Sites allocated for 139 dwellings in the Havant Borough Council Local Plan (Allocations) (July 2014) covering the period up to 2026 which is within the period considered by this Application (up to 2030).

3.3 Sites allocated for 2,400 dwellings up to 2036 and a further 1,000 thereafter, in the emerging Havant Borough Council Local Plan. A proportion of these would be developed before 2030.

6. An assessment of committed development sites has been undertaken through the further submissions to HCC.

RCPC’s Further Comment:

Table 9 in the ‘Technical Note’ does not include the following permitted planning application in Havant Borough:

West of Horndean Road (Havant Borough Council (HBC) Ref: APP/14/00547) -125 dwellings. This is Policy UE13 in the Havant Borough Council Local Plan (Allocations). The site is about 0.5 miles south of Bartons Road, and traffic leaving the site and heading north or approaching from the north would use Havant Road. This site was under construction but not occupied in June 2018 when the traffic survey was carried out

7. Allocated sites in the current Local Plan (3.2) are generally accounted for through the application of Tempro growth factors.

RCPC’s Further Comment:

a. The application uses the TEMPRO National Trip End Model AF15 dataset to derive background growth factors for East Hampshire 016 (E02006829). It is not stated if this dataset reflects site allocations outside East Hampshire (e.g. Havant).

b. It is noted that with regards to this matter, the ‘Technical Note’ states on page 17: ‘Position – 1.69 HCC to review and provide further comment on the application of Tempro growth.’

8. Draft site allocations through the emerging Local Plans are not generally considered due to the uncertainty over their planning status and ultimately their delivery. However, in developing an Evidence Base for those Local Plans, the cumulative impacts will have been assessed.
9. The status of the Land East of Horndean site as an allocated site means that the emerging Local Plan Transport Assessments and later individual site assessments will account for the cumulative effects.

RCPC’s Further Comment:

a. Paragraph 2.66 of the ‘Technical Note’ requests an indication of the source of traffic arising from site allocations in the Havant Borough Council Local Plan. This information is provided in the attached report by Rowlands Castle Parish Council on the (unreserved) matters of the means of access to the highway network (junction arrangements) and associated highway improvements - Annex B’

b. Paragraph 2.67 of the ‘Technical Note’ states

‘The Transport Assessment for the Havant Borough Council Local Plan was prepared by Hampshire Services / Hampshire County Council. The Transport Assessment extended to assess Havant Road and Junction 2 of the A3(M) and by virtue of the Land East of Horndean site’s status as an allocated site (Policy HN1) for development and extant planning permission would have been accounted for. As such a cumulative assessment has been undertaken’

However, the HBC Local Plan Final Transport Assessment (February 2019) contains Figure 18 ‘Larger proposed development allocations (sites as considered likely allocations by HBC at September 2017)’. This does not show the Land East of Horndean site and there is no reference to it elsewhere in the report.

c. Paragraph 2.68 of the ‘Technical Note’ states:

‘2.68 The conclusion of the Transport Assessment was that there was no significant effect to report. As such Hampshire County Council both having undertaken the assessment and reviewed this as part of the evidence base for the Local Plan are satisfied with the cumulative effects on the local highway network.

However, the HBC Local Plan Final Transport Assessment (February 2019) in Table 16 (Junction Mitigation Findings) it proposes that the B2149 Durrants Road / B2148 Whichers Gate Road existing mini-roundabout should be converted to a signalized junction at an indicative cost of £1.8 million.

RCPC 4. Inappropriate use of residential traffic trip rates determined in 2014, thereby relying on a very outdated version of the calculation system and its 2005/7 surveys. That determination did not adequately consider the mixed tenure of the application site and its scale.

10. The trip rates used to forecast movements associated with the development are based upon those used in the previous Transport Assessment for the site. These trip rates were approved by HCC and their use in the Transport Assessment was specifically requested by the highway authority.
11. The age of survey data that the trip rates are based upon has little bearing other than perhaps to over-estimate trip forecasts (where the prevailing pattern is a reduction in trips). Further, the trip rates are based upon private houses, providing a higher forecast of trips than might be expected should rental properties or flats / apartments be considered.

RCPC’s Further Comment:

Why is there an opinion that rental properties or flats/apartments produce fewer trip rates? The residents will own cars or motor cycles and may have commercial vehicles to park overnight. They will also have the same needs for deliveries and other services where vehicles are used. Overall in Rowlands Castle we have seen a considerable increase in traffic throughout the day and congestion at times outside of the peak hours.

12. The trip rates used in the Transport Assessment are considered to be robust and provide an acceptable forecast of trips associated with the development proposal, suitable for assessment of highway capacity.

RCPC’s Further Comments:

a. It is noted that in their comments on the Land East of Horndean planning applications 55562/007 (Development of a care village comprising a 60-bed care home and a village care centre), and 55562/008 (Development of a 60-bed care home and up to 50 extra care bungalows and apartments) submitted in June 2019, HCC Highways Development Planning Strategic Transport HCC stated: ‘Trip Generation - The applicant has used the TRICS database, an industry standard tool, to provide the proposed trip generation from the site. The considered robust.’

b. In the previous Transport Assessment, Trip Rates were derived from Version 7.1.1 of the TRICS, and the reports from that system were generated on 16th April 2014. New versions of TRICS are released every 3 months, and version 7.5.2 was the most recent version when this Application was submitted. The TRICS Good Practice Guide (2016) states in paragraph 2.2: ‘Between updates, new data is added, and from time to time, some sites are removed from the system due to issues with data, or moved from one land use category to another (due to re-classification). There is no set rule against using an earlier version of the system. However, users should always aim to use the most up to date version’.

RCPC 5. 25% of the residential trips from the development will use the B2149 Havant Road South of Pyle Lane at peak times to reach Havant. A further 3% would arise from journeys to Rowlands Castle or Havant railways stations to reach London. This will result in an increase at peak times of 20% in south-bound traffic on that road. The application distributed only 16% of the additional traffic to Havant Road (South). There will be an increase in trips on Rowlands Castle Road of 7% and not 0% as stated in the application.
13. The trip distribution presented in the Transport Assessment is based on Census journey to work information. By reviewing the most direct route, and journey times using tools such as the Google Maps Route Planner, the most likely route for each destination has been selected. The distribution presented in the TA is considered to be sound and the highway authority has confirmed they are satisfied that it is appropriate to assess the development.

RCPC's Further Comment:

The attached file '55562 005 LEOH – Residential work-related trips to SE and London by residents of residents of RC Ward Hazelton and Blendworth’ includes data obtained from the 2011 'Location of Usual Residence and Place of Work (WF01BEW)' Census data. The ‘Usual Residence’ of work-related trips was set as the Census Super Output Area Mid Layer East Hampshire 016 (E02006829) which includes the Horndean Hazelton and Blendworth Ward, and Rowlands Castle Ward. To obtain places of work (destination of work-related trips), all areas in the South East and London for ‘Merged Local Authority Districts’ were selected.

This Census data shows that residents of those Wards had Places of Work in 43 areas in the South East and in 18 areas of London, and indicates the number of trips made to each of those Places of Work.

For trips within the South East, 25% were to Havant, 22% to Portsmouth, 21% to East Hampshire, and 7% to Chichester. Of the other 39 areas, none had more than 6% of the total number of trips.

Using this data, and for the purposes of this application, it must be assumed that at least 25% of the residential traffic from the application site would travel southwards along the B2149 Havant Road, and that the 7% would use Rowlands Castle Road.

It is very possible that traffic to Places of Work in the South East other than Havant, would also travel southwards along Havant Road, to, for example, join the B2148 (Whichers Gate Road), and travel eastwards along Emsworth Common Road.

3% of the total number of trips in the Census data were to 17 areas in London, and it could be reasonably assumed that these would be made by rail. These journeys would start from Rowlands Castle or Havant railways stations to reach London. Havant railway station would be reached by travelling south on Havant Road, and Rowlands Castle station by also travelling south and joining Castle Road, or by using Rowlands Castle Road. It is likely that some of the trips to other areas in the South East would also be by rail from Rowlands Castle or Havant stations.

14. The proposal does not include for an access on to Rowlands Castle Road. Whilst it would clearly be inappropriate to say that no car drivers will ever choose to use Rowlands Castle Road, the requirement to access this via a route turning north along Havant Road, through the roundabout with Dell Piece East and then turning right to Rowlands Castle Road or via Pyle Lane is unlikely to be seen as the more convenient route compared to the more direct option via Havant Road to the south.
RCPC 6. Incorrect implication that the part of Havant Road south of the development will not experience an increase in AM and PM peak flows of greater than 10% and that therefore it is not considered in the Environmental Assessment. The increases in the AM and PM peak flows will be 11.9% and 11.5% respectively.

15. The application of a 10% threshold relates to the Environmental Impact Assessment and consideration of transport matters.

16. There are two thresholds to considering terms of traffic increases. The first is a 30% increase in traffic which should be considered on all links. The second is a consideration of specifically sensitive links where traffic increases of 10% may be assessed.

17. In the case of the network considered for Land East of Horndean, the sensitivity of links has been assessed in the context of traffic increases and were not considered to pass the identified thresholds.

RCPC’s Further Comments:

The table below shows data from Appendix I (Traffic Flow diagrams – Baseline 2018 and 2030 scenarios) of the ‘Environmental Statement – Technical Appendix J: Transport Assessment’ relating to traffic flows along Havant Road south of Access C (the southernmost access to the site).

<table>
<thead>
<tr>
<th>Year</th>
<th>Flow</th>
<th>Total Development Flows (800 units)</th>
<th>Total Committed Development Increase</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018</td>
<td>Morning Peak:</td>
<td>South 702 799 13.8%</td>
<td>North 723 796 10.1%</td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>1,425 1,595 11.9%</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Afternoon Peak:</td>
<td>South 784 865 10.3%</td>
<td>North 799 900 12.6%</td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>1,583 1,765 11.5%</td>
<td></td>
</tr>
</tbody>
</table>

Appendix I – Traffic Flow diagrams – Baseline 2018 and 2030 scenarios

This demonstrates that the traffic increases would be greater than the 10% threshold, and so the impact should be assessed.

18. Movements below the thresholds are generally considered to be insignificant in environmental terms given that daily variations in background traffic flow may vary by this amount.
RCPC 7. No mitigation proposed for the increase in traffic that will cause the mini-roundabouts at the junction of Manor Lodge Road, Durrants Road, Whichers Gate Road and Redhill Road, to be overloaded.

19. The scope of the highway impact assessment was agreed with HCC prior to submitting the planning application. Whilst this does not preclude a later assessment, the number of movements forecast to pass through these mini-roundabouts during peak hours is low. The proportional impact at these roundabouts will not be significant.

RCPC’s Further comments:

a. This contradicts the East Hampshire Local Plan Interim Transport Assessment – February 2019, which contains a section entitled 'Highway Link Flows, Delays and Capacity Hotspots'. The data in this section has been obtained from Transport Modelling of the road network before the allocated development sites in the emerging local plan are considered. It does consider the LEOH site which was allocated in the adopted version of the Local Plan, but assumes it would be for 700 dwellings, but the latest application is for 800 dwellings. It provides the following data for these mini-roundabouts:

Junction 42 - Durrants Dual Mini Roundabouts [SOUTH]: on the Manor Lodge Road [NW] approach arm, this junction is forecast high delays of 126s in the PM period, as well as a high Volume/Capacity (V/C) of 101% in the AM and IP (inter-peak) periods and 106% in the PM period.

Junction 43 - Durrants Dual Mini Roundabouts [NORTH]: on the Manor Lodge Road [NW] approach arm, this junction is forecast a moderately high 86% V/C in the IP period. On the Manor Lodge Road [SE] approach arm, this junction is forecast high delays of 88s with 104% V/C in the AM period, and high V/C ratios of 100% and 102% in the IP and PM periods, respectively.

b. This also contradicts the Havant Borough Council Local Plan Final Transport Assessment (February 2019) Table 8 ‘Junctions for Potential Mitigation Assessment List’ which states that the southbound Manor Lodge Road approach to the B2149 Durrants Road / B2148 Whichers Gate Road junction is over capacity in the PM. This does not consider the additional traffic from this application site.

c. It must be recognized that a considerable proportion of residents in the new development will need to travel south into Havant to access shops, services, the principal railway station in the area and the coastal region offering both employment and also recreation in varying forms. The impact on the B2149 and B2148 leading down to the coastal areas will be considerable over and above what are already high volume routes for much of the day.

20. It is understood that financial contributions toward improving the capacity at these mini-roundabouts has been secured as part of the Land South of Oaklands House development. Further, the previous planning permission for Land East of Horndean included a further financial contribution towards these mini-roundabouts.
RCPC’s Further Comments:

a. The S106 agreement for the ‘Land South of Oaklands’ development (dated 21st September 2015) does not require a financial contribution towards improvements at these mini-roundabouts. It requires a Transport Contribution of £200,000 for:

1. Traffic Calming scheme on Whichers Gate Road
2. Improvements to local public transport infrastructure
3. Cycle storage at RC village centre
4. Improvements including access, surfacing and fencing work to circular cycle route linking the highway network to Staunton Country Park and the Right of Way network.


21. It is understood that an improvement scheme is being developed by HCC as part of the transport evidence base for wider Local Plans. As such, pooled financial contributions from a range of development will be sought. In the case of Land East of Horndean, the financial contrition may be collected as part of the Community Infrastructure Levy (CIL) payments.

RCPC 8. No assessment of the impact of increased traffic on the junction of Havant Road and Castle Road.

As with comment 7, the scope of the highway impact assessment was agreed with HCC prior to submitting the planning application and did not include this junction. The additional through movements associated with Land East of Horndean is not likely to materially affect the capacity performance of this junction.

RCPC’s Further Comments:

Some traffic from the proposed new development would be very likely to use Castle Road to access the Rowlands Castle railway station, the Rowlands Castle GP surgery, and places such as Chichester which are further to the east. Vehicles are parked along most of the length of this road, making it very difficult for other vehicles to pass along it. Any increase would exacerbate this problem. The junction from Castle Road to Havant Road already presents safety issues.

RCPC 9. No assessment of the impact of increased traffic on the junction of Manor Lodge Road (a continuation of Havant Road) and Mallard Road that already experiences delays and queuing at peak times. It is the only exit for the 160 dwellings in the Kings Meadow Estate.
23. As with Comments 7 and 8, HCC did not request that this junction be assessed. The impact that development traffic may have at this junction is not likely to be material. RCPC’s Further Comments: This contradicts the East Hampshire Local Plan Interim Transport Assessment – February 2019 (referred to above) which provides the following data for this junction: Junction 44 - Manor Lodge Rd / Mallard Rd: on the Manor Lodge Road [NW] approach arm, this junction is forecast high delays of 83s with a 91% V/C in the AM period, and of 94s with 93% V/C in the PM period.

RCPC 10. Gross underestimate of the increase in traffic on Rowlands Castle Road.

24. As detailed earlier, the distribution of trips that positively excludes Rowlands Castle Road has been agreed with HCC. The Local Plan policy for the site is also clear that access should not be taken from Rowlands Castle Road, in part to avoid additional vehicle movements on this street.

25. Whilst some movements on this road would be expected, the number of trips would not be significant. The figures presented in the Transport Assessment are presented for highway capacity purposes to assess the impact of the development rather than to be explicit about every route available to car drivers.

RCPC’s Further Comments:

a. Rowlands Castle Road is already a well-established route for traffic driving towards Chichester and further east. At present, as shown in the Traffic Flow diagrams in the Transport Assessment, during the morning peak hour 135 Passenger Car Units (‘vehicles’) travel eastward along Rowlands Castle Road. 38 of these (28%) join Rowlands Castle Road having driven northwards along Havant Road from its junction with Dell Piece East (Junction 2).

b. Of the traffic currently approaching Junction 2 from the west, 25% turns northwards onto Havant Road. Of the traffic approaching Junction 2 from the south, 21% continues northwards along Havant Road. 12% of the traffic travelling northwards on Havant Road from Junction 2 turns into Rowlands Castle Road. This indicates that a significant number of vehicles travelling from outside the area of this site use Rowlands Castle Road. It should be assumed that because this site is very close to Rowlands Castle Road, a greater proportion of its residents would use Rowlands Castle Road.

c. The distance by road from the Havant Road/Dell Piece junction to Chichester via Rowlands Castle Road is approximately 3 miles shorter than the route southwards along Havant Road and to the A27. Therefore, it is very likely to be an attractive route for residents of the development.

d. Rowlands Castle Road would also be used by residents travelling to Rowlands Castle Railway Station.
e. Additional traffic using Rowlands Castle Road to travel eastward towards Chichester would exacerbate the existing problems in Rowlands Castle at the junction of Bowes Hill, Finchdean Road, Woodberry Lane and The Green. The double arch railway bridge severely restricts visibility at the junction.

f. The attached report (55562 005 – Pre-decision amendment – increase in traffic on Rowlands Castle Road) gives details of these traffic flows based on diagrams in appendices to the Transport Assessment.

RCPC 11. No recognition that the entire application site is within the catchment area of the Rowlands Castle GP Surgery that will probably require residents of the application site to drive into the centre of the Rowlands Castle village, which has very limited parking facilities.

26. Visitors to the Rowlands Castle GP surgery will generally fall outside of peak hours. As such, those that drive will have little impact on highway capacity. People choosing to drive to the GP surgery will have access to the car parking throughout the village. The number of people visiting the GP surgery at any one time from the development would not be excessive and it is considered that there will be appropriate parking provision to accommodate this demand.

RCPC’s Further Comments:

The applicant does not state on what grounds it is considered that there will be appropriate parking provision. This claim conflicts with the local knowledge that the existing limited parking facilities within the grounds of the GP surgery are already full for most of the day with staff cars. The on-street parking in the immediate vicinity of the surgery is restricted to 30 minutes which is frequently inadequate for waiting for and attending an appointment; further away in the village, parking is mostly taken up with residents’ vehicles so there is very little spare parking and that is not guaranteed. The elderly and infirm, or mothers with very young children may find it very difficult to park at an acceptable distance from the surgery.

It is also a serious safety concern that the applicant’s response suggests that visitors to the Rowlands Castle GP Surgery outside peak hours will generally fall (!).

RCPC 12. No recognition that approximately 40% of the area south-west of Havant Road is within the catchment area of the Rowlands Castle St. John’s Church of England Controlled Primary School.

27. The development proposes a new primary school facility that will provide a local school for future residents. Whilst parents and carers of children will have choice with regard to school placement, it is considered that generally pupils attend their closest school.

28. The HCC educational department has confirmed that catchment areas will be redefined following the opening of the new school at Land East of Horndean. The initial advice provided is that the new catchment will be largely constrained to the development site and areas of Horndean to the east of the A3 (M), largely ensuring attendance by local pupils.
RCPC 13. Site accesses B and C should have ‘ghost islands’ and not be simple priority junctions. In addition to serving the stated 104 dwellings, access C will be used by school traffic and other areas of the site.

29. The proposed site access arrangements B and C incorporate ghost island right turn lanes within the design.

RCPC’s Further Comments:

A key issue for residents exiting major new developments onto busy roads is being able to turn right, which needs co-incident gaps in traffic on both lanes to permit safe exit. Too often the gaps in traffic flows are not co-incident, leading exiting vehicles having to push out across the nearer lane when a gap is available and hoping that traffic will slow and offer a space in the further lane.

This is not a safe practice. Mini roundabouts offer a safe way of vehicles turning right as when they move forward they have right of way over the traffic in the further lane. Ghost islands only help traffic turning right off the main road, mini roundabouts help traffic both entering and leaving large developments off and on to a busy road.

RCPC 14. No consideration is given to the likely increased use of Pyle Lane as a ‘short cut’ from Havant Road to Rowlands Castle Road in the vicinity of the site. At the junction of Pyle Lane and Rowlands Castle Road there is a blind bend with limited visibility.

30. The nature of Pyle Lane with narrow carriageway widths and limited visibility is considered to be a deterrent to use as a convenient rote between Havant Road and Rowlands Castle Road. It is considered that by not seeking to improve visibility or provide a more convenient route, car drivers will continue to be deterred from using the lane. Owing to the character of Pyle Lane, the number of additional movements associated with the development is not considered to be significant.

RCPC 15. Non-compliance with EHDC Local Plan (2014) policy CP31 because no proposals are made to improve access to and parking at, or adjacent to, Rowlands Castle railway station.

31. Any planning permission for the site will result in CIL payments, a proportion of which may be directed towards the measures identified above.

RCPC’s Further Comments:

The S106 agreement for the ‘Land East of Horndean’ development (2015) requires a contribution of £180,000 for a ‘Multi-modal access to Rowlands Castle and Rowlands Castle Rail Station’
RCPC 16. No consideration of the cumulative impact of construction traffic arising from the possible development of the Havant Thicket Reservoir, which could be taking place while this site is being developed.

32. The Havant Thicket Reservoir has limited planning status nor is any information about movements that may be associated with its construction or operation available. Any forecast of movements would be based on assumptions of use that may not be relevant to the final proposals. As such an assessment of this emerging proposal cannot be reasonably undertaken nor is it required by virtue of its limited planning status. Peak period movements associated with the proposal will be low and unlikely to significantly affect highway capacity.

33. It would be appropriate for the supporting assessments for the Havant Thicket Reservoir to consider the cumulative effects of the Land East of Horndean, which is an allocated site in the Local Plan and benefits from a previous planning consent.

RCPC 17. There should be a permanent and enforceable planning requirement that the bus gate entrance onto Rowlands Castle Road should not be made available for a more general use by other vehicles. Otherwise, this would result in a very significant use of Rowlands Castle Road as a route for travelling eastwards.

34. As suggested in the RCPC comment, the facility on to Rowlands Castle Road is provided for the use of public transport vehicles, pedestrians and cyclists. It is positively not intended for general vehicle movements.

35. Any future planning permission can include a relevant condition or obligation to confirm the proposed use. Further Traffic Regulation Orders will specifically prohibit use by general vehicles.

RCPC 18. RCPC would normally expect an Application of this scale and nature to include substantial transport-related documentation in the form of a named Transport Assessment or Statement to justify the proposals therein. In RCPC’s opinion, neither The Environmental Statement - Traffic and Transport nor Environmental Statement Appendix J Part 1 (TA), constitute an appropriate level of examination and evidence to support this Application.

36. The scope of the Transport Assessment has been agreed with both highway authorities in the area; Highways England and Hampshire County Council. Both authorities have requested additional information post submission that has been provided.

37. The Transport Assessment and supporting information has been prepared in accordance with industry standard practice and is considered to be appropriate in scope and detail to support the planning application.

Annex B
Route for traffic travelling northwards to connect with the B2149 Havant Road

Reference Site Name: Number of Dwellings
Traffic will join Bartons Road and take either the Petersfield Road (B2149)-Durrants Road-Manor Lodge Road-Havant Road or Comley Hill (B2148)-Whichers Gate Road-Manor Lodge Road-Havant Road.

Up to 2036:
KS5 Southleigh: 1,002
KS5 Southleigh: 1,000
Southleigh Road (East of Horndean Road) - Horndean Road (B2148)-Comley Hill-Whichers Gate Road-Manor Lodge Road-Havant Road.

H6 Land North of Long Copse Lane: 260
H21 Land South of Bartons Road: 175

Portsmouth Water:
HQ120 H25 Southleigh Park House: 35
H27 Helmsley House: 15
Former Colt Site: 90

UE33 Eastleigh House, Bartons Road: 8
Horndean Road (B2148)-Comley Hill-Whichers Gate Road-Manor Lodge Road-Havant Road.

Total of Other Sites: 864
Total of Southleigh (up to 2036): 1,964
Total of Southleigh (2037 onwards): 2,964
North Street, Emsworth - Horndean Road (B2148)-Comley Hill-Whichers Gate Road-Manor Lodge Road-Havant Road.

Southleigh Strategic Site: Other

Residential work-related trips to the South East and London regions by residents of Rowlands Castle Ward and Horndean Hazeltion and Blendworth Ward on 2011 Census day:

<table>
<thead>
<tr>
<th>Place of work</th>
<th>Number of Trips</th>
<th>Proportion of trips to each place of work in the region</th>
<th>Direction along B2149 Havant Road for shortest travel route to and from work</th>
<th>Direction at Dell Piece East Rounabout</th>
</tr>
</thead>
</table>

RCPC 10. Gross underestimate of the increase in traffic on Rowlands Castle Road.

a. Appendix I – Traffic Flow Diagrams and Appendix G – Traffic Flow Diagrams – Development Trip Distribution in the ‘Environmental Statement – Technical Appendix J: Transport Assessment’ show the increase in residential traffic in the AM peak using Rowlands Castle Road and Havant Road:

Direction of Travel 2018 AM Survey - Appendix I - Traffic Flow Diagrams AM Development Trip Assignment (800 dwellings) - Appendix G - Development Distribution Proportionate Increase due to 800 dwellings Northwards from Junction 2 (Dell-Piece East/Havant Road) continuing on to Horndean 289 5 1.7% Northwards from Junction 2 (Dell-Piece East/Havant Road) turning eastwards onto Rowlands Castle Road 38 1 2.6% Additional Traffic travelling northwards along Havant Road from Junction 2 (Dell Piece East/Havant Road)
b. Appendix I – Traffic Flow Diagrams in ‘Environmental Statement – Technical Appendix J: Transport Assessment’ gives the following 2018 AM Peak survey data for traffic using Rowlands Castle Road:

Direction of Travel  Passenger Car Units (‘Vehicles’)  Proportion of Total Traffic turning eastwards onto Rowlands Castle Road:

- Northwards from Junction 2 (Dell-Piece East/Havant Road) turning eastwards onto Rowlands Castle Road 38 28%
- Southwards from Horndean centre along Havant Road towards Junction 2 (Dell-Piece East/Havant Road) but turning eastwards onto Rowlands Castle Road 97 72%

Total traffic travelling eastward along Rowlands Castle Road


c. Appendix I – Traffic Flow Diagrams in ‘Environmental Statement – Technical Appendix J: Transport Assessment’ gives the following 2018 AM Peak survey data for traffic travelling northwards from Junction 2:

Direction of Travel  Passenger Car Units (‘Vehicles’)  Eastwards from A3(M) towards Junction 2 and turning northwards onto Havant Road:

- 657 Northwards from Junction 2 continuing on to Horndean centre
- 720 Northwards from Junction 2 towards Horndean centre
- 325 Turning east from Horndean Road onto Rowlands Castle Road

Total traffic travelling northwards from Junction 2 turning into Rowlands Castle Road

01/04/20

Pre-Decision Amendment – 3rd March 2020

The Parish Council has considered this application and unanimously agreed to OBJECT for the following reasons, and this will be recorded at its meeting to be held on Monday 6th April 2020:

1. Underestimate of the traffic from the proposed development that would use Whichers Gate Road. The proposal asserts that no traffic from the development would use Whichers Gate Road.

The ‘Land east of Horndean - Further post-application technical and design response to issues raised by consultees’ document refers in paragraph 2.2 to a ‘B2149 Rowlands Castle, Double Mini-Roundabout Junction Capacity Assessment’ dated 28th October 2019, which contains ‘Appendix A Traffic Flow Diagrams’.

- The ‘Development AM (15-minutes)’ diagram does not show any traffic travelling south from the proposed development and turning into Whichers Gate Road. In sharp contrast, together the four ‘2018 Survey AM’ Traffic Flow Diagrams show that about 75% of south-bound traffic turns into Whichers Gate Road.
• Similarly, the ‘Development PM (15-minutes)’ diagram does not show any traffic travelling north along Whichers Gate Road and towards the proposed development. In contrast, together the four ‘2018 Survey PM’ Traffic Flow Diagrams show that about 90% of the traffic along Whichers Gate Road approaching the mini-roundabouts would travel north of Redhill Road towards the proposed development.

It seems very probable that traffic arising from the proposed development of about 800 dwellings and employment land would make use of Whichers Gate Road in a proportion very similar to that shown in the ‘2018 Surveys’, and that, therefore, the modelling of the southern roundabout of Junction 9 (and in particular Arm 2) should be reviewed.

2. Underestimate of the traffic from the proposed development that would travel westwards along Redhill Road to the mini-roundabouts and then travel northwards towards the proposed development. No traffic is shown as taking this route, but traffic going in the other direction is shown,

Both the ‘Development AM’ and ‘Development PM’ traffic flow diagrams show vehicles travelling southwards from the proposed development and entering Redhill Road. However, neither of them shows any vehicles leaving Redhill Road and turning northwards towards the development.

It would seem likely that at least some of the vehicles that travelled eastwards along Redhill Road would return westwards.

3. The following ‘Further Comments’ submitted by RCPC in September 2019 have not yet been fully addressed in the plans and documents submitted for this amendment:
   • RCPC 2. No assessment of growth in traffic from further 80 dwellings now developed in Rowlands Castle, none of which were occupied when the traffic survey was undertaken. There is also another site allocated for 10 dwellings.
   • ‘Paragraph 6 of the ‘B2149 Rowlands Castle, Double Mini-Roundabout Junction Capacity Assessment’, the only the committed developments considered are those that were specified in the Transport Assessment dated December 2018 (Appendix G and H), and that did not include these 80.

   • RCPC 3. No assessment of the impact of traffic from dwellings under construction and allocated sites in nearby areas of Havant Borough which will use Havant Road to connect with the A3(M)
   • RCPC 8. No assessment of the impact of increased traffic on the junction of Havant Road and Castle Road.

The Traffic Flow Diagram (Development PM) Appendix A of the ‘B2149 Rowlands Castle, Double Mini-Roundabout Junction Capacity Assessment’, shows that 9 vehicles per 15 minutes would travel south from the development and turn eastwards into Redhill Road, and the ‘Development AM’ diagrams shows 15 vehicles per 15 minutes would take this route.
Because there is mainly only residential accommodation along the stretch of Redhill Road from the mini-roundabouts to its junction with Castle Road, it seems very probable that these vehicles would be travelling through the Rowlands Castle village to other destinations such as Chichester. In this case, it is more likely that they would use Castle Road which is a shorter route.

- RCPC 9. No assessment of the impact of increased traffic on the junction of Manor Lodge Road (a continuation of Havant Road) and Mallard Road that already experiences delays and queuing at peak times. It is the only exit for the 160 dwellings in the Kings Meadow Estate.

- RCPC 11. No recognition that the entire application site is within the catchment area of the Rowlands Castle GP Surgery that will probably require residents of the application site to drive into the centre of the Rowlands Castle village, which has very limited parking facilities.

- RCPC 15. Non-compliance with EHDC Local Plan (2014) policy CP31 because no proposals are made to improve access to and parking at, or adjacent to, Rowlands Castle railway station.

Paragraph 6.5 of the ‘Land east of Horndean - Further post-application technical and design response to issues raised by consultees’ document refers only to a ‘financial contribution secured through the Section 106 to provide, for example, additional signage, directional fingerposts and cycle parking infrastructure (at Rowlands Castle station).’

4. Significant increase in traffic travelling along Redhill Road towards the Rowlands Castle village centre because of the proposed development.

The Traffic Flow Diagrams ‘Development AM’ and ‘Development PM’ in Appendix A of the 'B2149 Rowlands Castle, Double Mini-Roundabout Junction Capacity Assessment', show that in the morning peak hour about 60 additional vehicles an hour would be travelling from the junction of Redhill Road and the mini-roundabouts towards the centre of the Rowlands Castle village, and in the evening peak hour about 36 vehicles an hour.

The ‘2018 Survey AM’ diagram shows 171 vehicles in the morning peak hour taking this route and the ‘2018 Survey PM’ diagram shows 236 vehicles in the evening peak hour would be travelling eastwards along Redhill Road

This indicates an increase of 35% in traffic along this route of in the morning peak hour, and an increase of 15% in the evening peak hour.

5. The 'B2149 Rowlands Castle, Double Mini-Roundabout Junction Capacity Assessment’ in Appendix B – Junctions 9 – Full Report, contains the following section: ‘2030 Base + Committed Developments – Data Errors and Warnings’

The warnings include the following:
• The linked junctions will be modelled as separate junctions, but the real behaviour may be that of a complex system with interactions that cannot be modelled.
• Mini-roundabout appears to have unbalanced flows and may behave like a priority junction; treat results with caution

This could imply that a version of the modelling software more appropriate to closely-spaced linked mini-roundabouts should be used in order to provide an accurate assessment.

6. The 'B2149 Rowlands Castle, Double Mini-Roundabout Junction Capacity Assessment' states in paragraph 9:

‘….The geometric input for the model was extracted from the Transport Assessment (TA) prepared by Motion (dated September 2014) as part of the planning application (ref. 30016/018) for residential development off Redhill Road in Rowlands Castle…’

The following response to this application from HCC Highways on 21st January 2015 includes the following comment:

‘Traffic Flow Data

The Highways Authority has previously raised concern that an element of the ATC data appears to be missing likely to be owing to damage to the equipment, The Highway authority has conducted a comparable traffic flow study using available data which confirms that this is broadly comparable and is therefore acceptable to the Highway Authority.

It must, therefore, be determined if the data from the TA for 30016/018 on which this ‘Mini-Roundabout Junction Capacity Assessment’ is based, is sufficiently accurate for its purposes.

7. The ‘Mini-roundabout Junction Capacity Assessment’ states in paragraph 25:

'Notwithstanding the above, an appropriate financial contribution towards the capacity improvements prepare by Hampshire Services as part of the Havant Local Plan Evidence Base is proposed. The financial contribution will facilitate the delivery of the scheme and allow capacity improvements identified by Hampshire Services to be brought forward.'

It should be clarified if this refers to the Havant Borough Council Local Plan Final Transport Assessment (February 2019) Table 16 (Junction Mitigation Findings) which was referred to on page 4 of RCPC’s response on 2nd September 2019. This plan proposes that the B2149 Durrants Road / B2148 Whichers Gate Road existing mini-roundabout should be converted to a signalized junction at an indicative cost of £1.8 million.

8. The 'Land east of Horndean - Further post-application technical and design response to issues raised by consultees’ document refers in paragraph 2.37 (Rowlands Castle Parish Council) to:
‘a package of highways and sustainable transport improvements has been identified and agreed to facilitate the site’s development and mitigate impacts. These will be funded through S106 contributions and CIL. The S106 contributions include a contribution towards improvements to the Rowlands Castle double mini roundabout improvement scheme.’

Paragraph 2.5 (Hampshire County Council (LHA)) only states ‘a range of Section 106 contributions towards highways works have been identified and agreed in principle by the applicant and the County Council’ In addition, Community Infrastructure Levy funding is intended to fund a range of sustainable transport infrastructure, including improvements to pedestrian and cycle links in the local area.’

It should be stated which other improvements are included in this package.

9. There is no assessment of the cumulative impact of traffic arising from this proposed development and the other proposed Land East of Horndean developments, viz. EHDC Planning applications 55562/006, 55562/007 and 5562/008.

10. The ‘Parameters Plan – Trees and Buildings’ does not show that the large woodland area in the southernmost part of the site to the west of Havant Road, as depicted in the ‘Illustrative Master Plan’, would be retained. Instead that area is designated as ‘Development Footprint’. It should be clarified whether or not that woodland area is to be retained.

South Downs National Park

10/1/19

Thank you for your correspondence received 14 December 2018, consulting us as a neighbouring authority on the above noted development proposals.

The National Park’s comments on the development are as follows:

The Council has a duty to consider the impact of the proposed development on the Purposes of the National Park, and it's setting, when reaching it's decision. The site forms the majority part of site allocation HN1 in the East Hampshire District Local Plan.

The principle of developing this site is therefore accepted. Outline consent has been previously granted on the site for an alternative scheme. The SDNPA is mindful of this when making our comments.

The SDNPA have the following comments on the outline development proposed:

Landscape and visual
The application site is located hard up against the boundary of the National Park along Havant Road (B2149) and Pyle Lane. The proposed development would give rise to a significant change in the character along this part of the National Park boundary due to replacement of agricultural land with extensive urban development. The development would result in loss of part of the undeveloped transition zone between the National Park and Horndean, and the development would result in the built up area of Horndean leap-frogging the A3.

Policy HN1 (h) requires that development "provide landscaping and screening to minimise the impact of development on the setting of the South Downs National Park and on the setting of the Grade II Listed Buildings at Pyle Farm". In line with this policy requirement, and in order to avoid a hard urban edge along the National Park boundary, the SDNPA have the following comments:

1. Chapter 2 of the Environmental Statement, and the Parameters Plan and Land use & Access Plan confirms that the existing boundary vegetation and most of the good quality trees along Pyle Lane will be retained. This is welcomed. In contrast, the existing vegetation along Havant Road is proposed to be removed in order to accommodate the proposed footway and cycleway provision.

This loss of existing vegetation is regretable. Could the pedestrian/cycle link be provided within the site itself instead perhaps

If the Council is satisfied that this vegetation removal is required, then it is essential that this is replaced with suitable screening planting. As far as the SDNPA can see, no details appear to have been provided at this stage to confirm that this replacement would be provided (although the illustrative masterplan does depict planting along this boundary) and the SDNPA would therefore like to see a commitment at this stage to the delivery of a strategic planting scheme along the eastern boundary of the development with the National Park. As well as retaining the existing trees and hedging along Pyle Lane, the SDNPA are concerned this does not go far enough and would ideally like to see this existing vegetation strengthened/supplemented in order to create a stronger visual buffer, and ensure the development is suitably screened/softened from the National Park in accordance with HN1 (h). This deepening of the existing landscaping should also apply along Havant Road in terms of any replacement planting.

In order to deliver a strategic planting scheme, the proposed built development along the eastern boundary should be set back sufficiently in order to enable space for any additional screening planting to be provided and establish over time. Any strategic planting should be delivered early in the project in order to ensure the mitigation becomes established as early as possible, and should be subject to an appropriate long term management regime. This is especially crucial along Havant Road where all existing vegetation is currently proposed to be removed.
At this stage, the SDNPA therefore currently have reservations about this element of the development and are not convinced it has been clearly demonstrated within the submitted details that the requirements of HN1 (h) will be met and delivered at the reserved matters stage. The SDNPA would request that a commitment to a strategic mitigation planting scheme along the eastern boundary is provided at this outline stage and are ideally details shown on the parameters plan. If a commitment to a landscaping/planting scheme along the eastern boundary has in fact already been provided within the submitted details, then the SDNPA would welcome direction to where this information is set out, and have the opportunity to comment on this.

A comprehensive landscape plan will be required at the reserved matters stage, including full details of the boundary planting to be provided. Any planting should consist of locally appropriate native species. Indicative streetviews from Havant Road and Pyle Lane would help to demonstrate the effectiveness of any proposed planting. The SDNPA would welcome the opportunity to comment on the landscaping details as and when they come forward, including the proposed species.

2. In terms of the spatial arrangement of built form and open space, it would be preferable if the areas of open space could be sited along the eastern boundary of the application site in order to create a softer edge to the development, and set the built form back further from the National Park boundary. The SDNPA note that there are constraints that may limit this possibility however, including the SGN pipeline in the northern part of the site. Failing this, the SDNPA would request that the lower density housing in larger plots area located along the eastern boundary in order to create a softer edge, in particular along Pyle Lane and close to Pyle Farm. This commitment would ideally be secured on the parameters plan in order to ensure it is carried through the reserved matters.

3. The SDNPA would welcome the opportunity to comment on the detailed design and materials of the buildings along the National Park boundary as and when they come forward.

4. A new junction/vehicular access point is proposed along Havant Road (B2149) in order to serve the residential units south of the proposed school playing fields. A new junction in this location would contribute towards a change in character and urbanisation of this stretch of Havant Road, and open up greater views of the built development from the National Park boundary. The SDNPA would prefer the removal of this access point from the proposed plans if possible and may help maintain a more rural character to the road and National Park boundary.

The SDNPA is pleased to see that no new access points are proposed along Pyle Lane.

*Heritage*

The proposed development would result in harm to the setting of the historic farmstead and grade II listed buildings at Pyle Farm which are located within the National Park.
The SDNPA appreciate that the Council will need to balance the wider public benefits of this strategic development against this significant harm. The landscaping and housing density comments suggested above (see landscape comments, points 1 and 2) would go some way to further mitigating the harm and meeting the requirements of HN1 (h).

The Council’s Conservation Officer should be consulted on the application.

*Lighting*

The South Downs National Park is a designated International Dark Sky Reserve and dark skies and tranquility are a special quality of the National Park which need to be protected. In line with this, paragraph 180(c) of the NPPF 2018 outlines that development should limit the impact of light pollution on intrinsically dark landscapes and nature conservation.

Chapter 9 of the submitted Environmental Statement considers the impact of new light sources from the proposed development on the dark night sky environment and nocturnal species during the construction and operational stage. The report appears to be generally well considered and recommends numerous design and control measures in order to try and limit light pollution. The SDNPA welcome these proposed measures and would ask that these are secured by condition and are followed through to the detailed design stage. The SDNPA would welcome the opportunity to comment on the details again at the detailed design stage. The applicant has also offered to undertake post-construction compliance checking which is welcomed.

Where possible, the SDNPA would welcome the use of curfews to restrict the use of street lighting when it is not required. Dimming of street lighting is currently proposed in accordance with Hampshire County Council’s specifications. The SDNPA is aware that HCC are currently considering part night switching however, and would therefore welcome consideration of this option in selected areas if appropriate.

It is unclear at this stage where the floodlighting is proposed as part of the playing fields. If floodlighting is proposed, or is proposed at a later date, then the SDNPA would welcome the opportunity to comment on this. At the detailed design stage, consideration should be given to new areas of glazing, especially on the larger educational/commercial buildings proposed. A large areas of uninterrupted glazing facing towards the National Park should be avoided, or suitable mitigation measures proposed. The SDNPA welcome the applicants commitment to no conservatories and the potential use of low transmittance/polarised/SMART glazing on rooflights. As outline above, the SDNPA would welcome the opportunity to comment on the detailed design and materials of the buildings facing the National Park boundary as and when they are submitted.

The Council’s Ecology Officer should be consulted on the proposed lighting details in terms of the impact on nocturnal species.
Biodiversity Various internationally, nationally and locally designated habitats have been identified as falling within the zone of influence of the proposed development, including Butser Hill SAC/SSSI, River Itchen SAC/SSSI, Catherington Down SSSI and The Holt SINC which are located within the National Park.

Protected species which move across the National Park boundary, including bats, could also be affected.

The Council must have regard to protected habitats and species within the National Park when making their decision and ensure that there would be no harm through direct or indirect impacts.

Harm to these habitats and species could undermine the first Purpose of the National Park.

Policy NH1 requires that development:

i) provide new green infrastructure to connect with the wider network, and to improve the habitat connectivity between the adjoining SINCS;

j) be supported by a Biodiversity Enhancement and Mitigation Scheme and include measures to protect key species and habitats on site;

The Council should ensure that these requirements have been sufficiently met, including potential habitat/species linkages to off site habitat in the National Park such as The Holt SINC. The SDNPA welcome the firm commitment to the provision of bat habitat buffers/corridors, including along the southern boundary of the site which could provide species links eastwards towards the National Park.

The specialist views of Natural England and the Council’s Ecology Officer should be sought on this matter.

Traffic

The SDNPA would support conditions securing a Construction Traffic Management Plan and individual residential/school/employment/retail travel plans as recommended by the Environmental Statement. The SDNPA would wish to avoid HGV's being directed down narrow rural lanes within the National Park.

Rights of way

Policy HN1 requires the development to f) provide an on-site movement layout suitable for all potential users, linked to existing external routes including the Public Rights of Way network, Horndean Village, Hazleton Common and the South Downs National Park;

This should be secured in detail as part of the reserved matters stage and the SDNPA would be interested in the provision of good and safe links to the National Park, including to Broad Walk/the Monarch’s way long distance walking route.
The Havant Thicket reservoir development to the south is known to be coming forward and could present a significant recreational opportunity for residents of the new development. It would therefore be highly desirable if the proposed development could provide for a future potential connection/onward links to Havant Thicket.

Existing public rights of way should be suitably protected during the construction phase.

HCC's Public Rights of Way team should be consulted on the application.

**Conclusion**

The SDNPA currently raise concerns over the proposed development as it is not clear whether suitable mitigation landscaping/screening will be delivered in order to minimise the impact of the development on the setting of the South Downs National Park and on the setting of the Grade II Listed Buildings at Pyle Farm.

The SDNPA would welcome the opportunity to comment again following receipt of further information/clarification on this point.

23/08/19

Thank you for your correspondence received 5 August 2019, consulting us as a neighbouring authority on the above noted development proposals.

The National Park’s comments on the development are as follows:

Thank you for re-consulting the SDNPA.

The comments raised in the SDNPA’s consultation response dated 8th January 2019 remain unchanged. The further information submitted does not appear to address the landscape impacts of the proposal and the SDNPA’s concerns raised in terms of the impact of the development on the setting of the National Park, especially the intended treatment of the development along Havant Road and Pyle Lane.

Policy HN1 (h) requires that the development "provide landscaping and screening to minimise the impact of development on the setting of the South Downs National Park and on the setting of the Grade II Listed Buildings at Pyle Farm". As outlined in our previous comments, the application as currently submitted does not clearly demonstrate/confirm that this criteria will be met.

The SDNPA would expect the above to be addressed/clarified prior determination to ensure there would not be harm to the setting of the National Park. In the continued absence of this, the SDNPA would raise a holding objection.

The SDNPA would be happy to comment again further if more information becomes available.

02/04/20
Thank you for your correspondence received 4 March 2020, consulting us as a neighbouring authority on the above noted development proposals.

Although the application site is located outside of the National Park, the Council has a statutory duty to consider the Purposes of the National Park when making its determination. The statutory purposes and duty of the National Park are:

1. Purpose 1: To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
2. Purpose 2: To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.
3. Duty: To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes.

The National Park's comments on the development are as follows:

We maintain the objection as set out in our previous responses of 8th January 2019 and 23rd August 2019, with the following additional comments.

Whilst we note the applicant's explanation of why they feel a southern access might be required, the extent of works to create such an access remains a key point of objection for the SDNP. The widening of the B2149 to create ghost island junction, along with loss of further hedgerow, road markings, and opening up of views into the development will unnecessarily bring the urban character further south east. Having had sight of Plan VD18678/100-06, We would also like confirmation that the red-line boundary and any widening of the B2149 do not extend into the SDNP, which is understood to run to the edge of the metalled carriageway rather than the field boundary.

We continue to support the principle of a shared footpath/cycleway towards Havant Thicket (insofar as is within the applicant's control), but we would maintain that this could be achieved west side of the roadside hedge to avoid further unnecessary loss of hedgerow.

The creation of a link from FP54 across Pyle Lane to FP25 (which is within the National Park) is welcomed. Both these footpaths form part of the long-distance Monarch's Way. Although the details would be the subject of a reserved matters application, we would suggest that the crossing point on Pyle Lane could utilise an existing gap in the hedgerow (field access) opposite the entrance to FP25.

South Eastern Hampshire CCG
11/1/19

Thank you for your email of 14 December 2018 in which you invite the CCG to comment on the above outline planning application and offer any other observations on the proposed development.
Whilst we recognise that not all of the occupants of the proposed 800 dwellings will be new to the area, we make the Heath Care planning assumption that this application will generate up to 1,920 additional residents (proposed no. of dwellings at 2.4 persons per dwelling).

The resulting growth in the locality population will inevitably seek registration with a local GP surgery and place additional pressure on existing NHS services; NHS services in primary, community and secondary care settings.

Our estimate of the level of additional demand that will be placed on NHS primary care does not in our view warrant the commissioning of an additional GP surgery. The increased demand will be accommodated by the existing GP surgeries open to new registration requests from people living in the area of the proposed development, however additional capacity within the premises will be required. Therefore the CCG considers that the application should be required to make an appropriate financial contribution to the capital investment that the NHS will make in this regard.

Please see below the NHS investment projection that the CCG will consider should the application be granted by the Council;

The proposed contributions formula for developments under 2000 dwellings is:
800 No. of dwellings x 2.4 divided by average list size (1800) x 16 (size of a consultation room (m2) x £375 (cost of rent and other additional expenses with regard to premises) x 20 (number of years expected on a lease)

The South Eastern Hampshire CCG requests that £128,000 be made available from developer contributions.

12/12/19

Thank you for your letter dated 5th August 2019 with notification regarding the above redevelopment.

As a Clinical Commissioning Group we have a specific interest in new residential developments and how the increased population would directly affect local healthcare provision. We are especially interested in the types of residential properties being built to help us plan for the future.

The resulting growth in the locality population will inevitably seek registration with a local GP surgery and place additional pressure on existing NHS services; NHS services in primary, community and secondary care settings.

The increased demand would be accommodated by the existing GP surgeries open to new registration requests from people living in the area of the proposed development; however additional workforce and building capacity within the premises will be required.
The CCG considers that the application should be required to make an appropriate financial contribution to the provision of capital and revenue investment that the NHS will make in this regard.

Please see below the NHS investment projection that the CCG will consider should the application be granted by the Council;

The proposed contributions formula for developments under 2000 dwellings is: 800 No. of dwellings x 2.4 divided by average list size (1800) x 16 (size of a consultation room (m2) x £375 (cost of rent and other additional expenses with regard to premises) x 20 (number of years expected on a lease)

This means that South Eastern Hampshire CCG will be looking for a contribution of £128,000 of planning gain for health.

South Eastern Hampshire CCG identifies multiple practices (Vine Medical Group, The Horndean Surgery, Cowplain Family Practice and Rowlands Castle Surgery) could be impacted by this development in our CCG area as their boundaries cover this area.

However, it is likely that The Horndean Surgery will be the preferred practice for new patient registrations due to their close proximity to the development. Therefore we request that funding be made available from developer contributions to enable those practices impacted, to make suitable building adaptations to facilitate this growth.

If you have any questions relating to this request please direct them, in the first instance, to Lisa Medway through our enquiries email address: SEHCCG.Enquiries@nhs.net

26/2/20

Thank you for your letter dated 5th August 2019 with notification regarding the above redevelopment.

As a Clinical Commissioning Group we have a specific interest in new residential developments and how the increased population would directly affect local healthcare provision. We are especially interested in the types of residential properties being built to help us plan for the future.

The resulting growth in the locality population will inevitably seek registration with a local GP surgery and place additional pressure on existing NHS services; NHS services in primary, community and secondary care settings.

The increased demand would be accommodated by the existing GP surgeries open to new registration requests from people living in the area of the proposed development; however additional workforce and building capacity within the premises will be required.
The CCG considers that the application should be required to make an appropriate financial contribution to the provision of capital and revenue investment that the NHS will make in this regard.

Please see below the NHS investment projection that the CCG will consider should the application be granted by the Council;

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If you have any questions relating to this request please direct them, in the first instance, to Lisa Medway through our enquiries email address: SEHCCG.Enquiries@nhs.net.

**Southern Gas**

18/2/19

We have received your enquiry via LSBUD. SGN have a high pressure pipeline in the vicinity of these proposed works. If this enquiry is an information only based search and no physical works are to be carried out, please refer to the plan and safety information received via the LSBUD website. If your works are planned please can you provide further details including;

- Detailed Drawings/plans
- Address of the works location
- Designs
- Overview of the Activity being carried out
- A confirmed on-site start date

Please submit this information to Maintenance.Land.Owner.Enquiries@sgn.co.uk
Please note that until we receive this information and have replied back to you, no works should occur within the vicinity of the pipeline. If we do not receive a response within 30 days, you will be required to resubmit your enquiry via www.linesearchbeforeudig.co.uk. The pipeline is of prime importance to the gas supplies of this area. It is essential that you comply with the restrictions detailed below and in the document SGN/WI/SW/2 in order to protect our plant and equipment and for the safety of your own operatives. Please note that this response does not give permission to carry out any works within the vicinity of the gas pipeline.

Browning, Christian
Mon 18/02/2019 10:21
To: EHDC - Planning Development Shared <planningdev@easthants.gov.uk>;

1 attachments (3 MB) SW2.pdf;

No mechanical excavation is allowed within 3 metres either side of pipeline. Please note that further restrictions on activities may need to be imposed as a result of a site inspection.

Further to your enquiry received on 18/02/2019 09:58:08 AM please find attached the ESP Utilities Group (ESP) response to your enquiry.

If your proposed work site was found to be in the vicinity of ESP plant, project drawing as laid extracts for these sites are enclosed (not to scale) for your information which show the approximate location of the ESP gas/electric network close to the area of interest.

As your plans for the proposed work develop you are required to keep ESP regularly updated about the extent and nature of your proposed works in order for us to fully establish whether any additional precautionary or diversionary works are necessary to protect our gas network.

Arrangements can be set in place so that one of our representatives can meet on site (date to be agreed) and we will be happy to discuss the impact of your proposals on the gas network once we have received the details.

ESP are continually constructing new gas and electricity networks and this notification is valid for 90 days from the date of this letter. If your proposed works start after this period of time, please re-submit your linesearchbeforeUdig enquiry.

**Sport England**

11/1/19

The site is not considered to form part of, or constitute a playing field as defined The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595), therefore Sport England has considered this a non-statutory consultation.
It is understood that is a Community Infrastructure Levy (CIL) charging authority and as such, the proposed development is required to provide CIL contribution in accordance with the Councils adopted CIL Charging Schedule.

Sport England notes that the outline application seeks to meet the new development's needs for sport and recreation through the provision of outdoor sports facilities, namely playing pitches.

Sport England is aware that East Hants District Council adopted an up to date and robust playing pitch strategy (PPS) for its area in 2018. Sport England considers that the work was developed in accordance with Sport England guidance. It is unclear how the proposed sports provision takes account or contributes to meeting the community needs for sport identified through the PPS. The PPS identifies particular issues for football and cricket within the “southern parishes” (includes the centres of Horndean; Clanfield and Rowlands Castle). In relation to football, it should be noted that the priorities centred around addressing the shortfall in the quantity of provision for youth 11x11; junior and mini-soccer in the sub-area, not adult football. Furthermore, the need for additional 3rd generation rubber crumb (3G) artificial grass pitches (AGPs) has also been identified within the PPS to meet the current and future needs of clubs in the “southern parishes”.

A single adult football pitch site is therefore considered unlikely to meet the needs of the new development and address the identified issues set out in the district’s own PPS. We should add that we do not support the development of single pitch sites as they are likely to prove unsustainable over the longer term and do not benefit from economies of scale associated with running a sports club. For example, maximising income generation from catering/bar facilities to ensure that suitable maintenance and management arrangements of the sports facilities can be sustained.

Sport England further notes that a “community building” is also proposed adjacent to the playing pitch. However, it is unclear whether the community building is intended to provide ancillary facilities to support the sporting use of the pitch. Eg, changing facilities etc.

Sport England notes that the previous application 55562/001 granted permission on 5 February 2016 included the provision of new cricket facilities including a new cricket pavilion. Sport England notes that this land no longer forms part of the application. It is disappointing that such provision will no longer be provided as the PPS identified the lack of cricket provision within the southern parishes and a new cricket ground would help to meet identified needs.

Sport England has consulted the national governing bodies for sport and has received comments from the Football Foundation (on behalf of the FA) and the ECB. The Football Foundation comments that the proposed development has not utilised the Playing Pitch Strategy that was produced in February 2018. An option of providing 1 grass pitch would not meet the needs of the local clubs in the area. There is a lack of 3G pitches within the southern parishes of East Hants to support clubs such as Clanfield, Horndean Hawks and Travaux so this could be considered as an alternative option for provision.
The ECB comments that it is disappointed to note that the land for the cricket pitch and associated infrastructure in the previous application approved in 2016 is no longer being included. The ECB comment that cricket is thriving in the area and currently only two clubs in the surrounding area do not have a junior section. Several clubs in the district have engaged in the ECB’s drive to recruit more 5 – 8 year old children into the sport through All Stars Cricket. It is hoped that this initiative will see an increase in the numbers of children participating in traditional junior cricket and that over time this will lead to increased participation levels in senior cricket and the development of women’s cricket in the area. To assist in this initiative, the aim of the ECB and the Hampshire Cricket Board is to increase the number of All Stars Cricket clubs/centres further in the District, using both club and local authority facilities.

Whilst the latest PPS states there is adequate access to facilities across the district, it also identifies the lack of community accessible pitches in the southern parishes, in which this proposed development is situated. The 2 pitches that do exist have been rated as poor or standard and have no artificial/non-turf pitches. The Hampshire Cricket Board understands that the District Council had previously communicated with local clubs and identified existing clubs that would have made use of the new facility for a second ground proposed in the previous application (55562/001).

**Active Design**

Sport England, in conjunction with Public Health England, has produced ‘Active Design’ (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government’s desire for the planning system to promote healthy communities through good urban design.

Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link:

http://www.sportengland.org/activedesign

**Conclusion**

In light of the above considerations, Sport England wishes to object to the application as it does not adequately meet the community needs for sport generated by this development. In our view, the proposal does not meet our planning objective 3 – to provide new facilities to meet demand. Sport England would welcome further engagement with the applicant and/or the local authority to better understand how this development could contribute to addressing the needs for sport as identified through the recent PPS, including the provision of additional 3G pitch(es).
Thank you once again for consulting Sport England. We would be grateful if you would advise us of the outcome of the application by forwarding a copy of the decision notice.

7/8/19

Sport England has no further comment to the revised documents. Please refer to our previous responses.

Should you require any further information, please do not hesitate to contact me on the number provided.

Please note: this response relates to Sport England’s planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.

2/4/20

Thank you for re-consulting Sport England on further information provided by the applicant.

In terms of sport, we note that the applicant in their design and technical response document responds to Sport England’s comments from 7th January 2019. These relate to the sections under community building; sports pitch and cricket provision.

Taking these in turn:

Community Building

Sport England does not object to dual use ancillary facilities which serve both sports users as well as wider community needs. In fact the approach can have benefits in terms of viability and sustainability. However, it will be important that such a facility supports the sporting use of the facilities/site. We would expect compliance with our and relevant national governing body for sport technical design guidance for clubhouses and pavilions. Such that key components of ancillary provision, as well as changing provision, are considered eg storage; catering; toilets etc.

Sports pitch

Sport England notes the applicant’s response to our comments about the football pitch and the “assumption” that this will be a 3G pitch. Does this mean the applicant will be providing the 3G pitch? As above it will be important that while there is an identified need in the area, the design and specification of the facility will need to be fit for purpose and will need to accord with FA design and testing requirements. Can further clarification and more detail be provided on this aspect of the proposal?

Cricket provision

We acknowledge the approach to cricket in the area.
Conclusion

Given the above approach, in order for Sport England to consider it capable of meeting our planning objective 3 – to provide new facilities to meet demand, a suitable Section 106 agreement would need to be drawn up detailing the sports provision to be delivered. Sport England therefore wishes to maintain its objection until we are satisfied with the wording of a draft section 106 or similar legal agreement detailing the sports provision to be delivered within a reasonable timescale.

29/4/20

Following our conversation last week, please find our response.

Sport England welcomes the further information/confirmation provided by the agent on the provision of the 3rd generation rubber crumb artificial grass pitch (AGP). We are supportive of the approach and the general direction of travel on this application which better seeks to respond to East Hants’ needs as identified in their Playing Pitch Strategy (PPS).

However, the detail on the design; specification and layout of the proposed sport and ancillary facilities; as well as their ongoing management and maintenance are important. For example, in order for the facility to be fully available to the community for formal sport it will need to comply with relevant national governing body (FA) and Sport England technical design guidance. For competitive football use, the pitch would need to be registered on the FA’s register of Artificial Grass Pitches and subsequently tested. Similarly, the AGP will require ongoing maintenance and it is important that business plans are put in place to ensure that the pitch is maintained to a good quality and the artificial surface is replaced after a period of approximately 8-10 years.

Without having that detail at this stage, it is difficult for us to formally withdraw the objection. However, we are supportive of the overall approach subject to agreeing the detailed wording in the Section 106 agreement which we would like to be consulted on.

Thames Water

No comments.

Traffic Management Team - EHDC

25/7/19

My comment on the above planning application is that there is insufficient detail for me to comment on the parking for this development.
19/8/19

Traffic team has no further comments to make at this time. My comments dated 25/07/19 still apply.

9/3/20

My previous comments still stand.
## S106 Heads of Terms

<table>
<thead>
<tr>
<th>No.</th>
<th>Obligation</th>
<th>Amount</th>
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<tr>
<td></td>
<td><strong>Owners covenants</strong></td>
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<tr>
<td>1.1</td>
<td>Provide written notice to the district council and county council of intended date of first commencement of development and notify the councils within 14 days of its occurrence</td>
<td>N/A</td>
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</tbody>
</table>
| 1.2  | Provide written notice to the district council and county council of the intended dates for the following and notify the councils within 14 days of each occurrence:  
  - Commencement of development in each phase  
  - Occupation of the first residential dwelling in a phase  
  - Occupation of the first unit on the employment land  
  - Occupation of 50th residential dwelling  
  - Occupation of 100th residential dwelling  
  - Occupation of 150th residential dwelling  
  - Occupation of 200th residential dwelling  
  - Occupation of 250th residential dwelling  
  - Occupation of 300th residential dwelling  
  - Occupation of 350th residential dwelling  
  - Occupation of 400th residential dwelling  
  - Occupation of 450th residential dwelling  
  - Occupation of 500th residential dwelling  
  - Occupation of 550th residential dwelling  
  - Occupation of 600th residential dwelling  
  - Occupation of 650th residential dwelling  
  - Occupation of 700th residential dwelling  
  - Occupation of 750th residential dwelling  
  - Occupation of 800th residential dwelling | N/A    |
| 1.3  | Compliance with affordable housing requirements                           | N/A    |
| 1.4  | Payment of monitoring and administration fee to the council              | £10,000|
| 1.5  | Phasing & Sub-Phasing to be defined by reference to Phasing Plan required by Condition 3 (as amended) | N/A    |

**Community Project Worker**
### Financial contribution towards Community Project Worker

| 2.1 | Financial contribution towards Community Project Worker | £250 per dwelling |

### POS management and Maintenance

| 3.1 | Requirement for council’s written approval of an entity for the maintenance and management arrangements of all of the following across the entire development: |
|     |     | N/A |
|     | • Informal and formal Public Open Space |     |
|     | • Ecological Mitigation Areas |     |
|     | • Sustainable Drainage System (other than those associated with adopted highways) |     |
|     | Proposals to include full details of the proposed structure and voting rights of the entity (if management company) and management plan |     |

| 3.2 | That all areas of open space remain as such in perpetuity |     |

| 3.3 | Requirement to form the management company in accordance with the approved proposal and for the council to approve the management plan in writing | N/A |

| 3.4 | Preparation and submission of the management plan(s) for open space, ecological mitigation and SUDs drainage to the council for written approval. Proposals to include details of how costs shall be met and access arrangements to the public open space regulated | N/A |

| 3.5 | Requirement to repair and maintain the land and facilities in each phase to the reasonable satisfaction of the council and in accordance with the management plan | N/A |

### Travel plan

| 4.1 | Provide the travel plan cash deposit/bond to the county council and pay the county council the cost of approving the travel plans | Cash deposit/Bond TBC |

| 4.2 | Pay the county council the cost of monitoring the travel plans | £3,000 (five times) |
| 4.3 | Prior to the occupation of any relevant phase or sub-phase of development, a Travel Plan for any residential, school or employment/retail uses proposed within that phase, where these have a floorspace of 1000sqm or more, shall be submitted to and approved in writing by the Planning Authority. These shall be based on the Framework Travel Plan, April 2019. | N/A |
| 4.4 | Implementation of travel plan | N/A |
| 4.5 | Appointment of travel plan coordinator | N/A |

**Drainage – SUDS and Foul Water**

| 5.1 | Submission and approval of arrangements for management and maintenance in perpetuity of the sustainable surface water drainage systems, and implementation | N/A |
| 5.2 | Maintenance of SuDS scheme in accordance with agreed regime | N/A |

**Employment Land**

| 6.1 | Provision of road connection to employment land boundary via Dell Piece East / Havant Road roundabout of adoptable standard and connections for services to serve the employment | N/A |
| 6.2 | Submission and approval of marketing strategy to dispose of the employment land. Employment land to be made available on the open market in accordance with the strategy | N/A |
| 6.3 | Owner permitted to consider alternative uses for the employment land, subject to relevant permissions, if all or part has not been disposed of for use as employment land by the end of the marketing period | N/A |

**Public open space, Outdoor Play and Sports**

<p>| 7.1 | Council to approve in writing arrangements for provision of public open space and community facilities on land not less than XX ha, including, football pitch, allotments, XX LEAPs, trim trail, semi-natural open space, informal open space, grassland buffers, ecology | N/A |</p>
<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
<th>Note</th>
</tr>
</thead>
<tbody>
<tr>
<td>7.2</td>
<td>Public open space including LEAP and trim trail equipment to be laid out</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Allotments</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8.1</td>
<td>Complete allotments in accordance with specification set out at schedule YY and offer to Horndean Parish Council within 2 months of completion and then, if not required by Horndean Parish Council, to Rowlands Castle Parish Council within a further 2 months</td>
<td>N/A</td>
</tr>
<tr>
<td>8.2</td>
<td>If accepted by parish council within 2 months of offer being made, transfer allotments to parish council</td>
<td>N/A</td>
</tr>
<tr>
<td>8.3</td>
<td>Transfer to include a restrictive covenant that allotments shall only be used for allotments</td>
<td>N/A</td>
</tr>
<tr>
<td>8.4</td>
<td>Meet all reasonable legal costs incurred by parish council in connection with transfer of allotments</td>
<td>TBC</td>
</tr>
<tr>
<td><strong>Cricket Pitch and Pavilion</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9.1</td>
<td>Pay cricket pitch and pavilion contribution</td>
<td>TBC</td>
</tr>
<tr>
<td><strong>Community Facility</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10.1</td>
<td>Complete community facility in accordance with specification set out in schedule</td>
<td>N/A</td>
</tr>
<tr>
<td>10.2</td>
<td>If community facility built by developer offer to Horndean parish council within 2 months of completion or if financial payment then offer to transfer land to Horndean parish council within 2 months of payment</td>
<td>N/A</td>
</tr>
<tr>
<td>10.3</td>
<td>Transfer to include restrictive covenant that community facility shall only be used for community use</td>
<td>N/A</td>
</tr>
<tr>
<td>10.4</td>
<td>If accepted by parish council within 2 months of offer being made, transfer community facility</td>
<td>N/A</td>
</tr>
<tr>
<td>10.5</td>
<td>Meet all reasonable legal costs incurred by parish council in connection with transfer of community facility</td>
<td>TBC</td>
</tr>
<tr>
<td>10.6</td>
<td>If council requires payment of community facility contribution, provide a serviced site for the community facility and offer unencumbered freehold to council</td>
<td>N/A</td>
</tr>
<tr>
<td>10.7</td>
<td>If accepted, transfer the serviced site to the council</td>
<td>N/A</td>
</tr>
<tr>
<td>10.8</td>
<td>Payment of community facility contribution to council</td>
<td>TBC</td>
</tr>
<tr>
<td>10.9</td>
<td>Owners to provide a sign to advertise community facilities, to the council’s design and layout, describing the community facilities within the development in a location to be agreed with the council</td>
<td>Max. £2,000</td>
</tr>
</tbody>
</table>

**Skate park**

| 11.1 | Pay skate park contribution | £75,000 |

**Highways works**

| 12.1 | Phased Delivery of Highway Infrastructure Works with regards to site access, off-site improvements, PROW contributions (if applicable), Bus Service provision, and Travel Plan to be agreed | TBC |
| 12.2 | Provision of minibus service to Horndean Technology | N/A |
| 12.3 | Provision of bus service to development in accordance with Service Level Agreement | N/A |
| 12.4 | Traffic Regulation Order (TRO) payment to seek to reduce speeds on Dell Piece East to 30mph | £6,000 |
| 12.5 | Contribution towards Rowlands Castle Double Mini Roundabout improvement scheme | £482,000 |
| 12.6 | Contributions towards the Multi-Modal access to Rowlands Castle and Rowlands Castle Railway Station | £201,000 |

**School site**

<p>| 13.1 | Provide details of the design of the proposed infrastructure relating to the primary school land and all parts of the land immediately adjacent to it to the county council | N/A |
| 13.2 | Grant the county council access to the primary school land for the purpose of undertaking surveys and investigations | N/A |
| 13.3 | Notify the county council prior to any negotiations with telecommunications and data communications providers that may serve the primary school land and ensure services are compatible with council's requirements | N/A |
| 13.4 | Primary school land to be cleared, level and remediated, as required, and not within the floodplain | N/A |
| 13.5 | Any environmental remediation scheme reasonably required by county council is to have been implemented | N/A |
| 13.6 | Programme of archaeological work required and approved by county council is to have been implemented | N/A |
| 13.7 | Any charge over the primary school land has been released and all necessary steps taken to enable county council to be registered with an absolute freehold | N/A |
| 13.8 | Removal of any unexploded ordnance from the primary school land | N/A |
| 13.9 | Enclosure of primary school land with a 2m high Heras fence or hoarding | N/A |
| 13.10 | Provision of a Land Registry-compliant plan showing precise location, size and boundaries of primary school land | N/A |
| 13.11 | Transfer of freehold interest in primary school land to county council subject to restrictive covenant | N/A |
| 13.12 | Provision of access and services to primary school land | N/A |
| 13.13 | Provision of temporary services and access to primary school site | N/A |
| 13.14 | Maintain access and services to primary school land at owner’s expense until school transfer date or relevant statutory undertaker has assumed responsibility | N/A |</p>
<table>
<thead>
<tr>
<th>Paragraph</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>13.15</td>
<td>Maintain temporary services and access serving primary school land at owner’s expense until school transfer date or relevant statutory undertaker has assumed responsibility</td>
</tr>
<tr>
<td>13.16</td>
<td>Provision of services and access to primary school land</td>
</tr>
<tr>
<td>13.17</td>
<td>Primary school land to be used for educational purposes and community facilities for 25 years</td>
</tr>
<tr>
<td>13.18</td>
<td>If construction has not commenced on the primary school, county council will transfer land to owner of land</td>
</tr>
<tr>
<td>13.19</td>
<td>Retain additional primary school land undeveloped except as temporary open space for 5 years</td>
</tr>
<tr>
<td>12.20</td>
<td>County Council may offer to purchase additional school land at residential value</td>
</tr>
<tr>
<td>13.21</td>
<td>Transfer additional primary school land to county council</td>
</tr>
<tr>
<td>13.22</td>
<td>If transfer is not completed within transfer period, provision in paragraph 13 no longer apply</td>
</tr>
</tbody>
</table>

**Affordable housing**

<table>
<thead>
<tr>
<th>Paragraph</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>14.1</td>
<td>40% of residential dwellings in a phase to be constructed on affordable housing land are designated as affordable housing</td>
</tr>
<tr>
<td>14.2</td>
<td>Affordable dwellings tenure mix to be agreed with council</td>
</tr>
<tr>
<td>14.3</td>
<td>5% of affordable housing in each phase to be fully wheelchair accessible, with size, type and tenure to be agreed with Housing Services Manager</td>
</tr>
<tr>
<td>14.4</td>
<td>Council to approve listed matters (layout, mix and tenure, location) with respect to affordable housing</td>
</tr>
</tbody>
</table>

**14.5 Affordable housing mix**

<table>
<thead>
<tr>
<th>Paragraph</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>14.6</td>
<td>Affordable dwellings only to be let or disposed of to designated person or registered provider</td>
</tr>
<tr>
<td>Section</td>
<td>Description</td>
</tr>
<tr>
<td>---------</td>
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</tr>
<tr>
<td>14.7</td>
<td>All affordable dwellings to be constructed in accordance with specified details and fully compliant with Homes and Communities Agency requirements</td>
</tr>
<tr>
<td>14.8</td>
<td>50% of affordable dwellings in each phase to be delivered and transferred to registered provider or designated person prior to the occupation of 50% of market dwellings within that phase</td>
</tr>
<tr>
<td>14.9</td>
<td>All affordable dwellings in phase to be delivered and transferred to registered provider or designated person</td>
</tr>
<tr>
<td>14.10</td>
<td>Details relating to transfer of rights to registered provider</td>
</tr>
<tr>
<td>14.11</td>
<td>Notify council’s Housing Service Manager of date when each affordable rented unit will be available for first occupation</td>
</tr>
<tr>
<td>14.12</td>
<td>Notify council’s Housing Service Manager of date when each affordable dwelling to be disposed of by shared ownership lease will be available for first occupation</td>
</tr>
<tr>
<td>14.13</td>
<td>Provisions do not bind any person who exercises the right to acquire or who has ‘staircased’ to 100% of the equity of a shared ownership lease, their mortgagee, or their successors in title</td>
</tr>
<tr>
<td>14.14</td>
<td>Conditions under which provisions do not apply to mortgagee in possession</td>
</tr>
<tr>
<td>14.15</td>
<td>Provision to vary percentages subject to a viability assessment</td>
</tr>
<tr>
<td><strong>15.1</strong></td>
<td>Employment and training plan to be agreed</td>
</tr>
<tr>
<td><strong>16.1</strong></td>
<td>Set out requirements for councils in relation to contributions and highways works</td>
</tr>
<tr>
<td><strong>16.2</strong></td>
<td>Provide further details of highway works</td>
</tr>
<tr>
<td><strong>16.3</strong></td>
<td>Provide draft transfer documents for school site</td>
</tr>
</tbody>
</table>

**Employment and training plan**

**Council and County Council Covenants to the Owners**
Annotated red line site plan
SECTION 1  Item 01  Development Land East of Horndean, Rowlands Castle Road, Horndean, Waterlooville

Site constraints plan
SECTION 1  Item 01  Development Land East of Horndean, Rowlands Castle Road, Horndean, Waterlooville

Parameters plan – land use & access
SECTION 1  Item 01  Development Land East of Horndean, Rowlands Castle Road, Horndean, Waterlooville

Illustrative Masterplan
Local Centre – illustrative layout
SECTION 1  Item 01  Development Land East of Horndean, Rowlands Castle Road, Horndean, Waterlooville

Illustrative phasing
SECTION 1 Item 01 Development Land East of Horndean, Rowlands Castle Road, Horndean, Waterlooville

Access works
SECTION 1  Item 01  Development Land East of Horndean, Rowlands Castle Road, Horndean, Waterlooville

Access works
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Original Outline Approval ref. 55562/001 - Illustrative Masterplan
SECTION 1  Item 01  Development Land East of Horndean, Rowlands Castle Road, Horndean, Waterlooville

Original Outline Approval ref. 55562/001 - Land use plan