

PLANNING APPLICATION FOR RESIDENTIAL DEVELOPMENT AND ASSOCIATED LANDSCAPING, ACCESS AND SUPPORTING INFRASTRUCTURE

PLANNING STATEMENT

LAND NORTH OF LONG COPSE LANE, EMSWORTH

ON BEHALF OF LAND AND PARTNERS

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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1.0 INTRODUCTION

1.1 This planning statement has been produced in support of an outline planning application for demolition of the existing buildings and the erection of a new residential scheme (C3 use to include affordable housing) and associated landscaping, access and supporting infrastructure. The application is submitted by Land and Partners (hereinafter referred to as 'L&P').

1.2 In addition to this Planning Statement, this application is accompanied by the relevant application forms and certificates, duly signed and completed, the correct planning fee and the following documents and plans:

- Location Plan by Carlton Design
- Illustrative drawings by Carlton Design (including illustrative masterplan for the H8 allocation and corresponding parameter plans for the application site)
- Air Quality Assessment by Accon UK
- Arboricultural Impact Assessment by Barrell Tree Consultancy
- Archaeological Desk Based Assessment by RPS
- Built Heritage Statement by RPS
- Contaminated Land Risk Assessment by WSP
- Design and Access Statement by Pegasus Group
- Ecological Impact Assessment by DW Ecology (incorporating Biodiversity Metric)
- Flood Risk Assessment and Surface Water Drainage Strategy by WSP
- Landscape and Visual Impact Assessment by Arc Landscape and Design
- Landscape and Green Infrastructure Strategy by Arc Landscape and Design
- Landscape and Green Infrastructure Strategy and Landscape Parameter Plan drawings by Arc Landscape and Design
- Lighting Assessment by WSP
- Minerals Resource Assessment by Wardell Armstrong
- Noise Impact Assessment by Accon UK
- Nutrient Balancing Assessment by Tetra Tech
- Sustainability Statement by Envision (incorporating Energy Assessment)
- Transport Assessment and Travel Plan by i-Transport

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- Utilities Assessment (incorporating Foul Drainage Strategy) by WSP

Report Structure

1.3 The following sections provide an overview of the proposed scheme and the planning case for the development. The structure of the statement is set out as follows:

- Section 2: Site Description
- Section 3: Proposed Development
- Section 4: Planning Policy Assessment
- Section 5: Conclusions

Application Summary

- At least 63 new affordable homes provided within the planning application area (78 in total across the whole allocation)
- Site well screened within the wider landscape with no long distance views of the site
- Reducing flood risk to existing properties through a comprehensive new drainage solution to prevent surface water from flooding on to the highway
- 70% of Long Copse Lane is unaffected by widening and most of the width required is already available now. The character of the lane will not be harmed
- Delivering a series of new public open spaces with biodiversity-rich planting and water features in excess of open space policy requirements
- Giving public access to the land for the first time
- Gap between Emsworth and Westbourne protected
- Site considered suitable and developable through the Council's 2016 SHLAA
- All homes to be set well back from the site frontage with new planting and water features adding to the sense of generous landscaped setting
- New strategic bat habitat created and nitrate mitigation at Stansted Park
- Improvements to Redlands Lane Public Right of Way to encourage more walking and cycling and better connections for existing residents
- Site unconstrained by restrictive policy designations

- Comprehensive biodiversity plan agreed in principle with the County Ecologist
- Improved visibility and new footpath provided around the corner with Hollybank Lane
- Site adjacent to the urban area of Emsworth

2.0 SITE DESCRIPTION AND CONTEXT

- 2.1 The site lies at the northern edge of the town of Emsworth and is 14.6ha in size. It has an irregular shape and is located to the north of Long Copse Lane, as well as to the north of Long Copse Cottage and Hollybank Cottage which are not included within the site. It lies to the east of Hollybank House which is a Grade II listed building, together with a Grade II listed creamery, which are also outside of the site.
- 2.2 The site promoted by L&P within this application does not include Longacre, a residential dwelling on the northern side of Long Copse Lane or land to the east of White Lodge. The omitted areas of land are part of the land allocated by emerging Local Plan Policy H8, which covers an area of 16.9ha, and are being promoted separately to the development proposed by L&P. The omitted areas are shown on the illustrative masterplan for information and reference is also made throughout supporting documentation to identify how this land can come forward at a later date.
- 2.3 The site largely comprises greenfield land, as identified by the Site Constraints Plan which is discussed more at paragraph 3.16. Built form at the site comprises of Hollybank Farm, a dwelling with a complex of stables and outbuildings in the centre of the Site and Old Dairy Farm, which is a dwelling, holiday cottage, stables and associated ménage in the north-west of the Site. Beyond the west and northern edges of the site are an existing woodland which connects to Southleigh Forest to the north. The land within the site rises up gently from Long Copse Lane then falls away towards the woodland which is to the north of the site.
- 2.4 The landscaped grounds of Hollybank House and a small pasture field to the east of White Lodge within the H8 allocation lie to the west of the site. Hollybank Woods (which is 61ha in size and part of the larger 158ha Southleigh Forest) and pasture land outside the H8 allocation lies to the north of the site. Hollybank Woods and Southleigh Forest comprise significant ancient woodland and so provides a permanent natural edge to the site.

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- 2.5 The majority of nearby properties are located to the south of the site and is generally of a standard suburban density with some larger individual plots
- 2.6 In the wider area, the site lies immediately north of Emsworth which is one of the five urban areas in Havant Borough. It hosts a wide range of local facilities and a train station with connections to a number of destinations including London Victoria, Brighton, Southampton, Chichester and Portsmouth.
- 2.7 Walking routes are available south into Emsworth, Westbourne and New Brighton for onward connections to other shops, leisure facilities and local bus services. Wraysbury Park Drive provides footways on both sides of the carriageway and Redlands Lane offers pedestrians a designated footpath (public right of way). Local roads including Long Copse Lane, Hollybank Lane, Southleigh Road and New Brighton Road are suitable for use by cyclists within the carriageway and National Cycle Network Route 2 provides an east/west connection approximately 1.5km south of the site between Havant, Warblington and Portsmouth to the west and Chichester to the east.
- 2.8 The site is also located in close proximity to the public rights of way network, which connects Long Copse Lane, Wraysbury Park Drive and Southleigh Forest via routes 66a, 66b and 67.

Planning History

- 2.9 There have been no previous planning applications for major residential development at the site. However, of relevance to this scheme is the following application:
- GEN/18/01143 – Request for a Screening Direction for a Proposal for up to 260 homes and associated parking, open space, surface water drainage and access at land north of Long Copse Lane, Emsworth – 1 March 2019
- 2.10 This request for a screening direction confirmed by the Secretary of State that the proposed development did not constitute EIA development.

Local Plan Background

- 2.11 The site was considered by Havant Borough Council (HBC) through their 2016 Strategic Housing Land Availability Assessment (SHLAA) process to be developable for 260 dwellings. Following this a Local Plan Housing Statement was produced (December 2016) which reflected the South Hampshire Strategic Housing Market Assessment's (SHMA) identification of an increased housing need, with an aim to create a positive framework for decision makers until the new Local Plan is adopted.
- 2.12 The Local Plan Housing Statement represented the first step in addressing rising housing need through a review of the Local Plan. In very broad terms the Housing Statement set a stance which supported the principle of comprehensive residential development of the application site at Long Copse Lane for around 260 homes, referring to it as reference UE76. The principle of development of the site would have otherwise been considered contrary to Policies CS17 and AL2 which aim to concentrate development within urban areas, resisting it elsewhere. However, the Housing Statement confirmed that the site was suitable for early release in order to meet identified housing need.
- 2.13 The production of the new Havant Borough Local Plan 2036 has been underway since 2016. The Council published the Draft Havant Borough Local Plan 2036 which was subject to public consultation between 8 January and 16 February 2018, including 10 exhibitions by Council Officers. This version of the plan included an allocation for the site under Policy H6 for the provision of around 260 dwellings.
- 2.14 Following this consultation, responses were reviewed by the Council and the evidence base was finalised. The Pre-Submission Havant Borough Local Plan 2036 was approved by the Full Council on 30 January 2019 and consulted on between 1 February and 18 March 2019. The Pre-submission version of the plan maintained an allocation for the site under Policy H8, for the provision of

around 260 houses and associated elements of the development.

- 2.15 Further changes to the Pre-Submission version were subject to public consultation between 3 November and 17 December 2020 and included some amendments to the proposed wording and requirements of Policy H8. Nevertheless, the proposed allocation of Land north of Long Copse Lane was maintained in the emerging Local Plan.
- 2.16 Subsequent to submission of the Local Plan for examination, detailed discussions between the Council and stakeholder groups have necessitated further changes to the wording of Policy H8 to ensure appropriate consideration is given to ecology, trees, the South Downs National Park and multi-user links to existing rights of way in the locality.

Pre-application Engagement

- 2.17 The site has been subject to detailed pre-application engagement with Havant Borough Council since 2017. The Council have confirmed that the principle of developing the site for residential use for around 260 houses in line with the Local Plan Housing Statement and its proposed allocation is supported subject to detailed considerations. It was advised that affordable housing should be provided at a rate in line with Council policies subject to viability, and with a 70/30 tenure split of Affordable Rented/Shared Ownership. Detailed advice was provided by officers to guide the submission of the application on aspects including highways, ecology, landscape, drainage and trees. No objections were raised about the proposal's ability to provide acceptable solutions to these detailed matters through the submission of an outline application.
- 2.18 To ensure that site-specific matters relating to nitrogen neutrality and required ecological mitigation have been subject to thorough consideration and appropriate solutions identified, discussed and agreed, lengthy engagement with Natural England has been undertaken. The outcome of meetings held from 2019 to 2021 has enabled a robust strategy to deal with relevant matters to emerge, the detail of which is discussed later in this document and which has

the support of decision-makers.

Statement of Community Involvement

2.19 In addition to the site undergoing public consultation through the emerging Local Plan process, it has also been subject to public consultation with the local community and stakeholders, organised by the applicant L&P, in line with the HBC's Statement of Community Involvement.

2.20 The pre-application engagement process undertaken included the following:

- Two pre-application meetings with the Council, the first in December 2017.
- Highways-specific pre-application engagement and meetings beginning in 2017.
- A presentation to the Development Control Forum in April 2018.
- A website dedicated to the proposed development, providing general imagery about the proposals as well as plans and proposal documents for review, as well as notifications for further consultation events.
- Two public consultation events were held in the Emsworth Community Centre on the 21st of March 2018 between 17:30 and 20:30, and on the 23rd of May 2018 between 17:30 and 20:00. The key principles of the proposed development were presented via exhibition boards and consultants were present to assist with providing more information and answering queries.
- Feedback from the public consultations was collated and responses were set out in an update leaflet sent out to near neighbours of the site in October 2018.
- Engagement with Natural England regarding Bechstein's Bat and nitrogen mitigation from 2019 to 2021.
- Engagement with South Downs National Park regarding Lighting and Dark Skies in 2021.
- Responses to the Local Plan consultation at Reg 19 stage and to clarify questions raised by the Inspector (Matters and Issues for the Examination – Stage 1 Hearings).

2.21 With the combination of the HBC emerging Local Plan consultation and the applicant pre-application stakeholder engagement, it is evident that the proposed development of the site has been subject to considerable consultation to date. This has informed the detail of the application proposals.

3.0 PROPOSED DEVELOPMENT

Application Description

- 3.1 The description of the proposed development at Land North of Long Copse Lane is *'Outline planning application for demolition of existing buildings and the erection of a new residential scheme (C3 use to include affordable housing) with associated landscaping, access and supporting infrastructure'*.

The Illustrative Masterplan

- 3.2 As is required by planning policy, which is set out in more detail in Section 4 of this statement, a comprehensive masterplan approach has been taken to the scheme proposals taking full account and consideration of its context, constraints and landscape character.

- 3.3 In particular, there are a number of key aspects which have been addressed as part of the masterplanning process:

- The character and function of Long Copse Lane;
- The setting of the Listed Buildings to the north and west – Hollybank House and its Creamery - set within landscaped grounds;
- The ancient woodland to the north and its role in accommodating Bechstein's bats;
- The role of the Site for wildlife, in particular as a likely commuting route and associated foraging habitat for Bechstein's bats; and
- The existing trees and hedgerows.

- 3.4 The resulting masterplan concept identifies how the 260 units identified in Policy H8 can come forward. For the purposes of this application, about 210 units within the red line are proposed for which a series of parameter plans and technical landscape, transport and drainage plans are submitted to identify how the scheme can come forward in a self-contained manner without precluding development in the remainder of the allocation.

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- 3.5 Careful consideration has been given to the optimum distribution of Green Infrastructure, movement framework and development parcels. This has been the starting point for this planning application. Later paragraphs in respect of the parameter plans governing this submission provide more detail.
- 3.6 Following early engagement with the Hampshire ecologist advising Havant Council and subsequent extensive bat surveys, the masterplan has been structured around a series of ecological corridors which has the primary function of enhancing and creating commuting corridors and associated foraging habitat for bats. The proposed approach will strengthen existing tree and hedge lines within and on the edge of the site as well as creating new routes. These corridors will have additional green infrastructure functions including landscape and visual buffers.
- 3.7 There are two main ecological corridors proposed; one running up the eastern boundary of the Site and one running north from the small copse next to Long Copse Lane (where there was previously a Bechstein's bat maternity roost) to the wooded grounds of Hollybank House. It is proposed that both of these will provide about a 30 metre wide bat movement route for Bechstein's bats from Long Copse Lane to the extensive woodlands in the wider area where the bats are concentrated. It is proposed that these ecological corridors will be able to integrate SuDS features in 'glades' but their primary function is woodland habitat.
- 3.8 The primary corridors are supplemented by a further minimum 30m buffer to the north of development, adjacent to the adjacent woodland, as well as a series of secondary ecological corridors that link with the two main ecological corridors and provide additional commuting routes for bats. The main function of these areas is to protect existing trees within and around the site as part of permanent landscaped features, which will provide character to the scheme and will also help to appropriately buffer the setting of the Listed Building, Long Copse Lane and the countryside edge. The secondary corridors are expected to typically be about 10 metres wide.
- 3.9 Lighting design has been factored into the illustrative masterplan to ensure

that the buffers proposed remain dark and meet the requirements of nocturnal species, to reflect best practice approaches. This site mitigation approach has been discussed and is supported in principle by Natural England and the HCC Ecologist.

- 3.10 Further to discussions with NE and HBC, it is also intended to use landscape buffer areas to provide permanently wet SuDS areas to assist with flood alleviation and on-site nitrogen offset. This integrated approach, using substantial landscaping within the scheme, will enable increased biodiversity, which in tandem with proposed off-site mitigation, will ensure significant gain to biodiversity, attributable to the development proposals.
- 3.11 As a result, the proposed built form will be naturally divided into areas, separated and enclosed by the ecological and landscape corridors.



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- 3.12 The proposed buffers and corridors have the effect of self-containing the overall development, within which the residential areas have emerged. The masterplan concept is one of public open space, containing pedestrian paths, set within woodland belts and SuDs features, reinforced by impenetrable scrub which will contain residents and avoid incursions into the ancient woodland of Hollybank Woods.
- 3.13 In addition, a watercourse helps to form a natural barrier to north and there is formal access into the woods nearby which comprises a network of managed paths with appropriate wayfinding.
- 3.14 The illustrative masterplan features a 54:46 ratio in terms of built form (7.95ha) to landscaping (6.75ha). Given the green spaces proposed and the relatively low net density development proposed (26.4dph), the scheme will deliver the housing envisaged whilst comfortably accommodating required open and play spaces, SuDS, part of the required nitrogen offset and landscape and ecological mitigation.
- 3.15 A series of constraints and parameter plans have also been produced to support the illustrative masterplan, which help to identify:
- Opportunities and Constraints
 - Ecology and Historical Assets
 - Development Framework
 - Movement and Spatial Features
 - Character Areas
 - Storey Heights

- Accommodation and Tenure
- Green and Blue Infrastructure

Site Constraints and Opportunities

3.16 The site comprises gradually undulating, mainly greenfield land, which rises to the centre from the north, south and east. Vegetation is largely located at the site perimeter, save for a broken-up line of hedging that stretches from west to east through the centre of the site and pockets of trees and hedging located towards the southern extent of the site.



3.17 The site is a patchwork of small paddocks, dwellings and stables characteristic of urban fringe, overlooked by existing dwellings and not part of wider rural landscape. It is well contained by existing trees and hedging, particularly to the north and west of the site and this provides the opportunity to define a

permanent natural edge to the outward expansion of Emsworth. The illustrative masterplan has responded positively to this, as demonstrated by the approach to the location of housing, natural features and infrastructure, as discussed below, see Development Framework.

Ecology and Historical Assets

3.18 The approach to the positioning and location of development and landscaping has been informed by existing ecological and heritage factors, situated primarily at or beyond the site boundary. The parameter plan extract overleaf identifies the constraints from which the Development Framework has evolved. In this manner, landscape buffers have strengthened areas where ecological enhancement opportunities have been identified, whilst appropriate density development, set behind enhanced landscape screening to ensure that the setting of the Grade II listed Hollybank House and Creamery have been satisfactorily respected.



Development Framework

- 3.19 Responding to the site constraints, ecological and heritage assets and in consideration of technical policy standards governing *inter alia* house sizes, open and play space requirements, garden sizes and depths, SuDS and biodiversity and parking and movement, a development framework characterised by a network of housing parcels has been created, broken up by open and play spaces, SuDS and ecological corridors, streets and paths.
- 3.20 There is significant space to work with to enable required mitigation and to ensure a landscape-led, low impact layout that can comfortably accommodate all technical requirements.

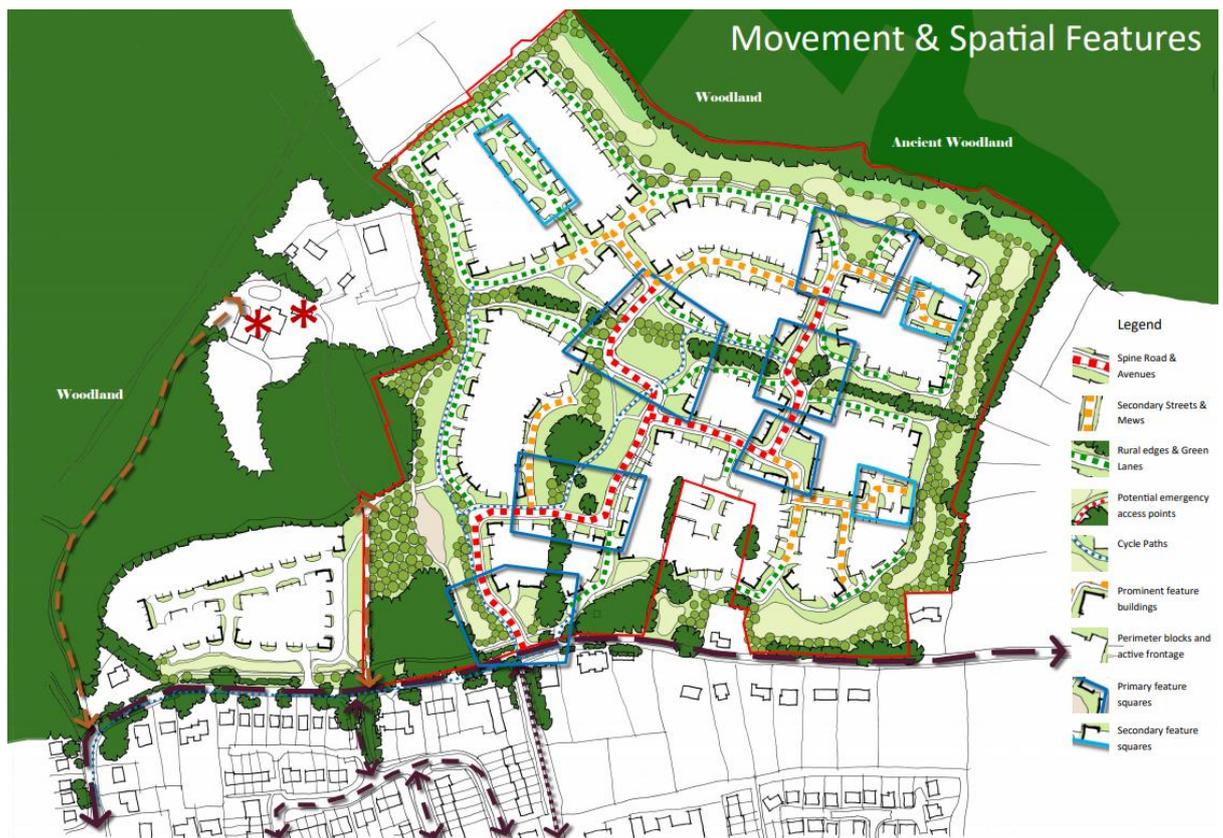


Movement and Spatial Features

- 3.21 The layout features a street hierarchy comprising a central spine road, which

serves a series of secondary routes within the site and rural edge/green routes at the site perimeter. The streets define a concept layout which seeks to maximise active frontage and allow for feature buildings to provide visual interest and variety within the development. Adjacent to proposed housing a series of feature squares are proposed that break up the mass of built form and link together open spaces throughout the site.

3.22 Whilst the application is in outline, significant work has gone into ensuring that the illustrative masterplan can accommodate all traffic demands, including provision of multi-user non-vehicular links to existing rights of way in the locality and management of parking in a manner that ensures no overspill onto external areas. The proposed layout allows for significant on-plot, off-street and on-street parking that will meet required parking standards.



3.23 In addition, the agreed site access strategy and widening of Long Copse Lane and Hollybank Lane have been agreed and approved through HCC's Section 278 preliminary design checking process. The Section 278 design checking

process involves a rigorous multi-disciplinary approval process which HCC required at an earlier stage of the planning process than is normally the case. This was required to provide certainty that the access strategy and road widening can be achieved and delivered within land that is either public highway or that is within the site allocation.

3.24 The widening of Long Copse Lane and Hollybank Lane can be delivered within the adopted highway. This has been carefully designed to avoid the use of highway land to the south of Long Copse Lane which has, over time been encroached upon by some of the frontages – for the avoidance of doubt the agreed scheme does not require the use of any highway land that has been encroached upon. The agreed site access strategy, the extent of adopted highway and extent of land that will be dedicated as public highway is shown on drawing ITB13525-GA-105 Rev A. A coloured illustration of the works is provided overleaf to help interpret the changes proposed in the wider context of surrounding existing development.

3.25 The agreed site access strategy is supported by a detailed arboricultural impact appraisal and method statement reference: 18083-AA5-DC with tree protection plan BT5. This identifies issues to be considered and addressed and outlines the tree protection measures for works within the highway associated with the proposed development. This has been approved by HCC Highways and the HCC tree section through HCC’s Section 278 Design Checking process.



Character Areas

- 3.26 The network of streets and spaces proposed and the hierarchies given to both allows a series of distinct character areas to emerge that reflect location within the site and the urban to rural transition. There is a large central green space and six secondary green spaces, which with the significant landscape and ecological buffering around the site help to shape the form of each character area.
- 3.27 Semi-rural streets are located towards the centre of the illustrative masterplan, with green lanes adjacent to the open spaces and retained ecological corridors that connect through the site. Rural edge lanes, feature housing solely on the inside of streets, to enable further separation between built form and the site perimeter.



Storey Heights

- 3.28 The layout features a predominance of two storey housing which befits the

prevailing character of the area. A small number of two and a half storey dwellings are suggested to provide for visual interest and to act as marker buildings within the site, assisting wayfinding.

- 3.29 Towards the site perimeter, it is proposed to provide a mixture of two storey and one and half storey 'chalet bungalow' dwellings, which in line with the approach to the street hierarchy and character areas developed within this, allows for a greater transition to the countryside and further mitigation to support the approach taken in respect of proposed landscaping and ecological buffers.



Accommodation and Tenure

- 3.30 The illustrative masterplan shows about 210 dwellings, indicatively provided as a range of dwelling types as follows:

Unit Type	Affordable Rent	Shared Ownership	Market	Total
1 Bed Units	16	8	13	37
2 Bed Units	17	9	52	78
3 Bed Units	8	3	66	77
4+ Bed Units	1	1	16	18
Total No. of Dwellings	42	21	147	210

3.31 A mix of detached, semi-detached and terrace housing is proposed, together with a small number of apartments. The mix of properties is as demonstrated on the Housing Mix parameter plan and accords with PUSH SHMA 2014 housing requirements for Havant 2011-2036.

3.32 It is proposed that 63 dwellings (30%) would be provided as affordable housing as a combination of affordable rented and shared ownership to reflect identified local housing needs and the policy requirements in terms of mix and tenure split as set out in Policy H4 of the emerging Local Plan.

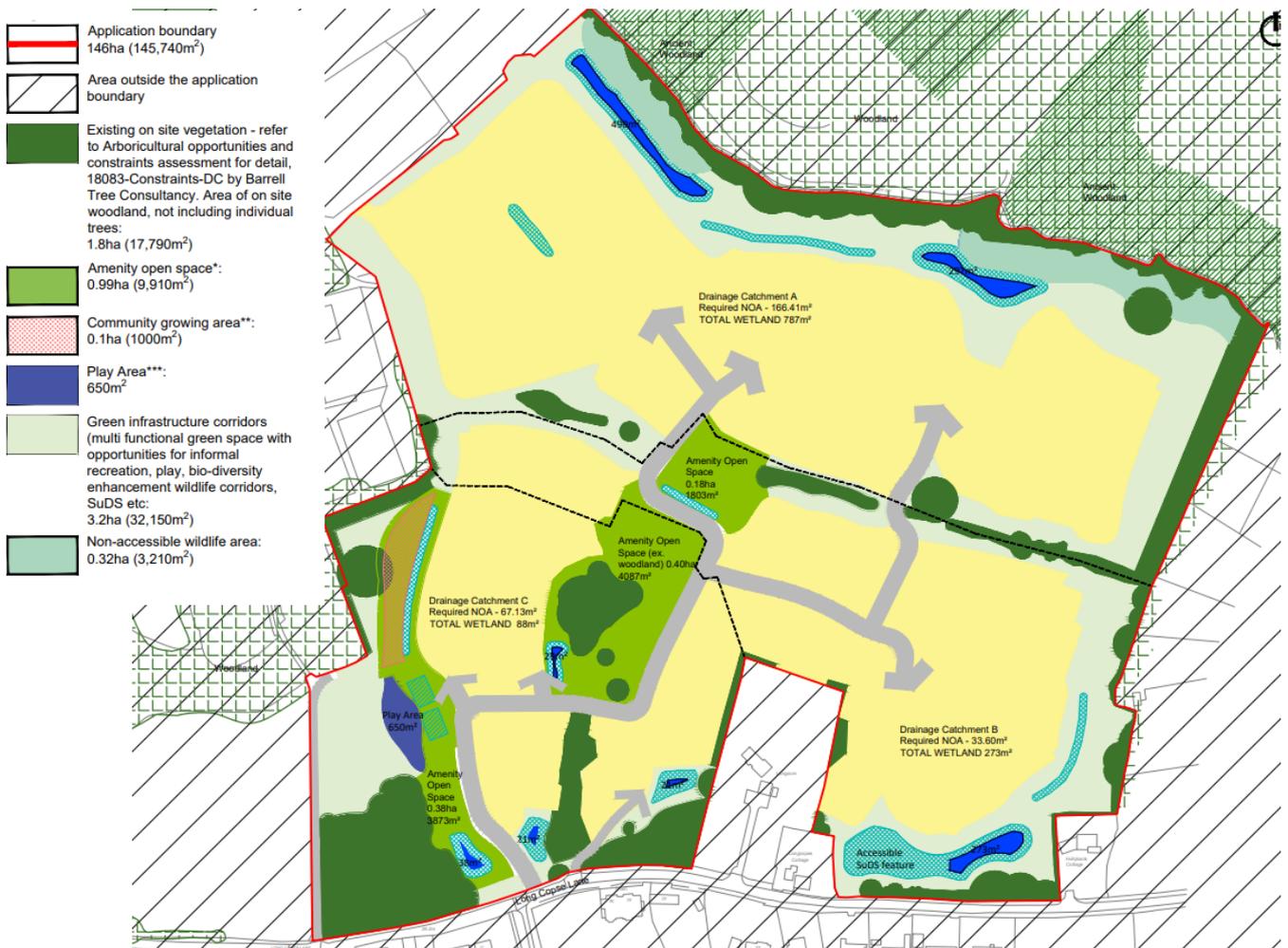


3.33 It is proposed to locate affordable housing in small various blocks distributed within the site, which in tandem with the character areas proposed will ensure

a tenure-blind scheme to emerge, whilst allowing for efficient management in clusters.

Private and Public Amenity Space

- 3.34 The illustrative masterplan comprises 6.47ha of private and public amenity space, not including garden spaces. The Open Space Provision on site, referenced to Field In Trust Open Space Guidance identifies significant excess provision, this also allowing for non-accessible wildlife and landscape buffers at the site edge to provide further protection to bats and to ensure dark skies requirements are met.
- 3.35 The open spaces will provide further strengthening to the ancient woodland to the north and Colman’s Copse in the south-west of the site.
- 3.36 Policy E9 - Provision of public open space in new development sets out the provision for open space provision. The policy guiding new residential developments of 50 dwellings or more to provide for on-site open space to a standard of 1.5 ha per 1,000 population (15m² per person).
- 3.37 Based on the current proposed housing mix for a 260 dwelling scheme, Policy E9 requires 0.81ha (8,145m²) of open space is provided, of which 0.1ha of this should be provided for community growing spaces.
- 3.38 As the open space requirement exceeds 0.5ha, an element of play should be provided. This is proposed to be a focal play area of 650m². Additional play is proposed to be provided informally throughout the external areas with natural play areas/elements.
- 3.39 As highlighted on the illustrative masterplan, the key central areas provide 0.99ha (9,910m²) of amenity open space, with extensive additional multifunctional open space of 3.2ha provided through the green infrastructure areas.



3.40 In addition to the publicly-accessible land and buffer zones, garden spaces are generous, which given the density of development proposed allows the illustrative masterplan to comfortably accommodate minimum depths and functional requirements as set out in supporting text to Policy H1 of the emerging Local Plan.

Infrastructure

3.41 The landscape masterplan illustrates the location of SuDS features throughout the site. A series of attenuation basins with an overall area of 5,010m² and two 135m² geo-cellular attenuation tanks provide a combined volume of 3,874m³. In addition, there is 5.41ha of impermeable area within the development.

- 3.42 These mitigation measures to manage rainfall run-off are discussed in greater detail within the Surface Water Drainage Strategy submitted with the application package.
- 3.43 This document assesses baseline conditions and proposes appropriate mitigation, which in this instance demonstrates that the Proposed Development can be drained using SuDS features for events up to the 1% AEP storm event, including an allowance for climate change (40% increase on peak rainfall intensity).
- 3.44 The development will also provide areas of permanent water within attenuation features, which will act as nitrogen sinks to offset the concentration of Total Nitrogen in the local streams, otherwise increased by the foul water flows from the development.

Parking and Cycle Parking

- 3.45 The scheme has been designed to be compliant with the minimum requirements of the Parking SPD, which identifies the following vehicle and cycle parking standards:

C3 Dwellinghouses – Vehicle Parking

Size of Dwelling/Zone	Minimum Car Parking Requirement	Havant Centre	Town Waterloo	Waterlooville Town Centre
1 Bed Unit	1 space	Max 1 space		Max 1 space
2 Bed Unit	2 spaces	Max 1 space		Max 1 space
3 Bed Unit	2 spaces	Max 1 space		Max 2 spaces
4+ Bed Unit	3 spaces	Max 2 spaces		Max 2 spaces

C3 Dwellinghouses – Shared/Communal Parking (unallocated)

Size of Dwelling/Zone	Minimum Car Parking Requirement	Havant Centre	Town	Waterlooville Town Centre
1 Bed Unit	0.9 spaces	Max 0.5 spaces		0.6 spaces
2 Bed Unit	1.3 spaces	Max 0.8 spaces		1 space
3 Bed Unit	1.9 spaces	Max 1 space		1.4 spaces
4+ Bed Unit	2.4 spaces	Max 1.2 spaces		1.8 spaces

Size of Dwelling	Long Stay	Short Stay
1 Bed Unit	1 space	In larger developments (schemes of 10 or more dwellings), short-term visitor parking will be expected at 20% of the long-term cycle parking standard.
2 Bed Unit	2 spaces	
3 Bed Unit	2 spaces	
4+ Bed Unit	2 spaces	

Trees

- 3.46 The scheme considers both on and off-site trees. In general, trees are to be retained and supplemented with new planting as demonstrated by the illustrative masterplan and landscape parameter plan. However, the Arboricultural Impact Assessment (AIA) identifies a Monterey Pine on the corner of Hollybank Lane with Long Copse Lane to be removed which is a category A tree. This mature tree has a limited future life expectancy and there have been incidents of similarly aged specimens dropping limbs and so may present more of a safety hazard in future with or without development. Therefore, its removal and replacement planting with younger vigorous specimens is considered an appropriate and sustainable long-term solution. Two category C trees and four groups of smaller category C trees are also to be removed but no mature or veteran trees are to be removed.
- 3.47 The AIA also includes a CAVAT valuation for the highway trees to be removed

which has been agreed between L&P and HCC Highways through the Section 278 Design Checking process. New planting of equivalent or greater value will be provided.

4.0 PLANNING POLICY ASSESSMENT

4.1 This section will assess the proposal against relevant planning policy. First, the Development Plan for Havant Borough Council will be considered, followed by other material considerations. Such an approach is consistent with planning law, which requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

4.2 The development plan for Havant Borough consists of the:

- Havant Borough Local Plan (Core Strategy), March 2011
- Havant Borough Local Plan (Allocations), July 2014
- Hampshire Minerals and Waste Plan, October 2013

4.3 Material considerations in this instance consist of:

- Local Plan Housing Statement, 2016
- The Submission Version Havant Borough Local Plan with Changes ('the emerging Local Plan'), as updated June 2021
- Emsworth Neighbourhood Plan, Post Examination Referendum Version 2021
- The National Planning Policy Framework July 2021 (NPPF)
- Supplementary Planning Documents (SPDs)

4.4 This report will now consider each of the key planning issues in relation to the proposed development in the context of the relevant development plan policies and material considerations.

Principle of Development

4.5 In order to establish whether the principle of the proposed development is acceptable, the relevance and weight to be given to the Development Plan and other material considerations needs to be determined. The NPPF states, at paragraph 219, that where policies pre-date the NPPF, *'due weight should be given to them, according to their degree of consistency with this Framework*

(the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)'.

4.6 Paragraph 48 of the NPPF states that Local Planning Authorities may give weight to relevant policies in emerging plans depending on the stage of preparation of the emerging plan, the extent to which there are unresolved objections to relevant policies and the degree of consistency of the relevant policies in the emerging plan to the NPPF.

4.7 Paragraph 11 of the NPPF sets out that decisions should apply a presumption in favour of sustainable development. For decision taking *'this means approving development proposals that accord with an up-to-date development plan without delay and 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'

4.8 It is considered that the Havant Borough Development Plan is out of date, including its most important policies relevant to determining this application relating to housing need and distribution. Whilst now replaced by the Local Plan (Submission Version), the Housing Statement 2016 which aimed to guide the future direction of the Local Plan actively supported housing delivery at the site. The site, further to assessment by the Council, is included as a policy allocation in the emerging Local Plan.

4.9 Further consideration of the principle of development in relation to prevailing policy is provided below, followed by our conclusions in this respect.

National Planning Policy

- 4.10 The most recent version of the National Planning Policy Framework (NPPF) was published in July 2021 and establishes a presumption in favour of sustainable development. Paragraph 2 states that the NPPF is a material consideration in planning decisions.
- 4.11 Paragraph 8 confirms that there are three dimensions to sustainable development – economic (building a strong, competitive economy); social (providing the supply of housing required to meet needs and creating a high quality-built environment); and environmental (protecting and enhancing the natural, built and historic environment).
- 4.12 Paragraph 9 confirms that these roles should be delivered through the preparation and implementation of plans and the application of policies, taking into account local circumstances to reflect the need and opportunities in each area.
- 4.13 Paragraph 11 stresses that plans and decisions should apply a presumption in favour of sustainable development. Development plans should promote a sustainable pattern of development, and proposals should accord with an up-to-date development plan. Paragraph 11 is also clear that where there are no relevant development plan policies or where such policies are out of date, planning permission should be granted unless other policies of the NPPF provide a clear reason for refusing the development or the adverse impacts of doing so would significantly outweigh the benefits.
- 4.14 Footnote 8 clarifies that where a local planning authority cannot demonstrate a five-year supply of housing (including any required buffer) or the Housing Delivery Test indicates that delivery of housing in the previous three years was less than 75% of the housing requirement, then any housing policies should be considered out of date.
- 4.15 In terms of determining applications, paragraph 38 of the NPPF sets out that

it is a requirement that Local Planning Authorities should approach decisions in a positive and creative way. This paragraph also states that Planning Authorities should work proactively with applicants to ensure that developments will improve the economic, social and environmental conditions, whilst seeking to approve applications for sustainable development where possible.

- 4.16 Paragraph 47 states that planning law requires applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise. It encourages that decisions on applications should be made as quickly as possible.
- 4.17 Section 5 on housing sets out that the Government is committed to significantly boosting the supply of homes (paragraph 60) in order to meet local needs and help make sure that land with permission is developed without unnecessary delay.
- 4.18 Paragraph 75 confirms that Local Planning Authorities should demonstrate a five-year supply of deliverable housing sites.
- 4.19 Paragraph 74 also confirms that where an Authority has persistently under delivered new housing over the past three years, a buffer of 20% should be applied to provide a realistic prospect of achieving planned supply. The rate of undersupply will be measured against the results of the national Housing Delivery Test introduced alongside the new NPPF. As per footnote 8, if a Local Authority is unable to demonstrate a 5-year supply of housing, their housing policies should be considered out of date.
- 4.20 The Council's most recent Five Year Housing Land Supply Update (December 2020) indicates that it is not currently able to demonstrate a five-year supply of deliverable sites. Most recent data, as submitted to the Local Plan Inspector (EB36a) identifies a 4.4 housing land supply.
- 4.21 Further, whilst awaiting the results of the 2020 Housing Delivery Test, the

Council has itself determined to produce a Housing Delivery Action Plan (HDAP) (January 2021).

- 4.22 Based on the Standard Method of calculating housing need, Havant need to deliver 486 new homes per annum, an increase of at least 171 dwelling per year compared to their existing target. Government consultation on the new Standard Methodology potentially increases the annual target to 504 dwellings per annum.
- 4.23 With the tilted balance in place on grounds of both supply and delivery (the latter being presumed by the Council) for the reasons set out in the HDAP, it is clear that the Council requires the sites identified in the emerging Local Plan to come forward.
- 4.24 The recently updated housing trajectory provided to the Local Plan Inspector highlighted total delivery of 10,645 units against a target of 10,433 units. The small buffer of 212 units identified means that all large allocations will be required to ensure that both supply and delivery targets can be met.
- 4.25 Having regard to the proposed development it is our view that it fully accords with the policies contained within the NPPF.

Planning Practice Guidance (PPG)

- 4.26 Planning Practice Guidance (PPG) was published online in March 2014, with periodic updates as national policy is changed or refined. It advises that: The National Planning Policy Framework represents up-to-date Government planning policy and must be taken into account where it is relevant to a planning application or appeal. If decision takers choose not to follow the National Planning Policy Framework, clear and convincing reasons for doing so are needed. A development that is consistent with the National Planning Policy Framework does not remove the requirement to determine the application in accordance with the development plan unless there are other material considerations that indicate otherwise.

4.27 The guidance advises that the statutory development plan is “the plan for the future development of an area”. It consists of:

- Local plans: development plan documents adopted by local planning authorities, including any ‘saved’ policies from plans that are otherwise no longer current, and those development plan documents that deal specifically with minerals and waste.
- Neighbourhood plans: where these have been supported by the local community at referendum and subsequently made by the local planning authority.

4.28 On this basis, the Havant Borough Local Plan (Core Strategy) (2011) and Havant Borough Local Plan (Allocations) (2014) together with the Hampshire Minerals and Waste Plan (2013) should continue to form the basis for determining planning applications in Havant Borough until such time the Havant Borough Local Plan is adopted. In the interim, the direction of travel set out by the emerging Local Plan and the emerging Emsworth Neighbourhood Plan (2021) is also a significant material consideration.

Adopted Local Plan (Core Strategy) 2011

4.29 The Core Strategy sets out how housing need will be met within the Borough. Policy CS9 states that 6,300 new dwellings are to be delivered between 2006 and 2026, with a suggestion of 826 dwellings (12%) coming from sites within Emsworth.

4.30 However, the Council has acknowledged through the Local Plan Housing Statement 2016 that the level of housing need, and policy basis for the Core Strategy is now out of date and does not deliver sufficient housing; housing need has been shown to be higher than that planned for in the Core Strategy. The NPPF therefore dictates that the Core Strategy should be given more limited weight on the basis that it does not plan for the identified housing needs of the Borough.

Local Plan (Allocations) 2014

4.31 The Allocations Local Plan followed the Core Strategy, allocating the land required to deliver the housing and economic requirements set out in the Core Strategy. Policy AL1 sets a presumption in favour of sustainable development and advises that where relevant policies in the plan are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:

'1. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or

2. Specific policies in the NPPF indicate that development should be restricted'

4.32 Policy AL2 relates to Urban Area Boundaries and Undeveloped Gaps between Settlements as defined on the adopted Policies Map. The policy aims to focus development on the five urban areas of the Borough, which includes Emsworth, within existing urban area boundaries. For Emsworth, Policy EM1 sets out a number of sites for housing development, but does not include Land north of Copse Lane.

4.33 However, through the Local Plan Housing Statement 2016, the Council state that the level of housing need and the policy approach taken in Policy AL2 for only delivering housing within the existing defined urban would not meet the Borough's currently identified housing needs, as required by the NPPF. Land would therefore need to be identified outside the urban area boundaries in order that housing needs are met. The automatic preclusion of development outside of the urban area boundary of Emsworth, as is the case for the application proposals, can therefore only be given limited weight in the decision-making process.

Local Plan Housing Statement 2016 (LPHS)

4.34 As introduced previously within this statement, the LPHS was produced

December 2016. Its purpose was to examine the implications of the housing need of the Borough which was identified in the South Hampshire Strategic Housing Market Assessment (SHMA). The SHMA identified an increased housing need, more than double the annual requirement of the Core Strategy.

- 4.35 In light of this high housing need, the LPHS confirmed that the Council would look at sites outside the urban areas of the Borough, as defined by Policy AL2 of the Adopted Local Plan to meet the Borough's housing need. The LPHS therefore identified a number of urban extension sites outside the urban area that were considered appropriate to come forward ahead of their formal allocation in the Havant Borough Local Plan 2036, so as to maintain a healthy supply of housing land in the short to medium term.
- 4.36 Land north of Long Copse Lane, Site reference UE76, was one such site identified as capable of delivering around 260 dwellings, subject to consideration of other policies in the Development Plan, and with provision of an Infrastructure Delivery Statement formed using the Council's template.
- 4.37 The application documentation supporting this planning application therefore includes detail on infrastructure delivery. There is no longer a requirement to submit a statement, as this flowed from the requirements of the Housing Statement 2016. Nevertheless, the work undertaken at this time and subsequently reviewed and discussed with stakeholders has helped to robustly inform the scope of the infrastructure needed to support the proposed development and how the infrastructure proposed as part of the scheme, reflects these requirements. This includes affordable housing, on and off-site highways works, drainage infrastructure, open space and formal play space, and CIL contributions, the detail of which is set out throughout this document and contained within the draft S106 Heads of Terms submitted to the Council for consideration.

Emerging Local Plan

- 4.38 In order to replace the current Development Plan which is crucially out of date with regards to the housing needs of the Borough, the Council is in the process

of producing a new Local Plan. The emerging Local Plan has been subject to various stages of public consultation and has recently been subject to Examination (July 2021).

4.39 The Emerging Local Plan proposes allocation of the site, Land north of Long Copse Lane, Emsworth, for about 260 dwellings under Policy H8. It seeks that that a comprehensively masterplanned development is delivered at the site, setting out the constraints and issues to be addressed by any development. The inclusion of the site within the Emerging Local plan confirms that the Council considers that the site is deliverable and that any issues can be overcome with appropriate mitigation.

4.40 It is appreciated that the emerging Local Plan is not yet adopted and that the examination process has only recently commenced. Nevertheless, the fact that the site has already been subject to substantial public consultation and assessment and there has been an extensive 'Call for Sites' process and assessment of the sites submitted to the Council, confirms that the sites included in the emerging Local Plan are considered suitable and deliverable.

4.41 Ordinarily, an emerging local plan for which the examination process has not been completed means that it can only be afforded limited weight, as set out in the NPPF. However, in view of the fact that the housing need and delivery policies in the adopted Havant Development Plan are considered to be out of date by the Council and the applicant, along with the site's identification in the 2016 Housing Statement, greater weight should be afforded to the relevant policies in the Emerging Local Plan which are informed by an up to date housing need assessment and evidence base.

Emerging Emsworth Neighbourhood Plan

4.42 The emerging Emsworth Neighbourhood Plan was recently passed at its examination and a referendum to complete the process was carried out on 8 July 2021. The plan that is subject of the referendum can now be given significant weight in the determination of planning applications in Emsworth.

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- 4.43 The emerging Emsworth Neighbourhood Plan has been informed by the strategic policies within the adopted Havant Local Plan comprising the Core Strategy (2011) and the Allocations Plan (2014) against which it has been found to be in general conformity.
- 4.44 This neighbourhood plan also has regard for the emerging Havant Borough Council Local Plan, which currently carries limited weight in the determination of planning applications within the borough.

Conclusions on Principle of Development

- 4.45 In summary, the proposed development accords with overriding NPPF policy and the principles of the approach advocated by the Housing Statement 2016. Inconsistency with out of date housing distribution Policies CS17 and AL2 can only be given very limited weight as they do not reflect the overriding need to provide sufficient housing, as set out in the NPPF, which is further supported by the site allocation under Policy H8 of the Emerging Local Plan. As such, the principle of the residential development of the site is considered to be acceptable, and in accordance with Development Plan and other material considerations.

The Site Allocation

- 4.46 The scheme subject to this planning application has been allocated in the emerging Local Plan under Policy H8, which states:

"Residential development of about 260 dwellings will be permitted where:

- a. The development of the site is masterplanned and delivered in a comprehensive manner;*

The site is informed by an illustrative and comprehensive masterplan, which has considered heritage, environmental and technical constraints to

enable a deliverable scheme to emerge. The application site meets all policy requirements in terms of open space, drainage, ecological and nitrate mitigation, in turn enabling the smaller part of the allocation which is in separate ownership to be able to come forward in an unencumbered manner.

b. Sufficient information is submitted to address the site-specific planning considerations. This is to be agreed at the pre-application stage and is expected to include the following:

i. Environmental Statement if required;

ii. Heritage Statement;

iii. Flood Risk Assessment;

iv. Drainage Strategy;

v. Ecological Assessment;

vi. Arboricultural Assessment;

vii. Transport Assessment and Travel Plan;

viii. Air Quality Assessment;

ix. Noise Impact Assessment;

x. Contaminated Land Investigation Report (to include gas monitoring);

xi. Lighting Assessment;

xii. Utilities Assessment.

This application is accompanied by a suite of documents, which include all of the above reports, as required, and for which the conclusions are summarised against policy within this document. Further to a Secretary of State Screening Direction in July 2019 which identified that the works proposed within the masterplan area did not constitute EIA development, no Environmental Statement is required.

c. An appropriate means of access is established, which incorporates road widening along Hollybank Lane and Long Copse Lane, to the satisfaction of the Highway Authority;

A comprehensive approach has been developed in conjunction with HCC and HBC and agreed to the satisfaction of HCC under its Section 278 Preliminary Design Checking process which takes account of several factors such as the extent of adopted highway, ecology, arboriculture and engineering. The agreed site access strategy can be delivered comprehensively or in two parts depending on whether the eastern and western parts of the site allocation come forward together or in a phased manner. Each phase will construct a pedestrian route to their common boundary running alongside Long Copse Lane and the L&P part (over 85% of the allocation area) will deliver all the required off-site highway improvements needed for the allocation. A position statement between the applicant and Highways Authority has been signed and formally submitted to the Local Plan Examination (Appendix 1 of MIQ41 - Havant Borough Council (HBC) Local Plan 2036, Site H8: Long Copse Lane, Emsworth - Position Statement on Highways and Transport Matters between HCC Highways / Land and Partners <https://www.havant.gov.uk/examination-library>

d. The proposal does not undermine the future development potential of surrounding sites;

The application site is designed to be self-contained and can accommodate all technical and open space requirements. All technical requirements are met on-site or via third party mitigation within the applicant's control (offsite bat

habitat creation and nitrate mitigation at Stansted Park). In this manner, the application proposals do not undermine the deliverability of the remainder of the allocation; in fact this application positively facilitate the delivery of the entire allocation.

e. Appropriate mitigation measures, including a sufficient woodland buffer, are put in place for Bechstein's bats in line with Policy E15;

Further to significant engagement with Natural England a series of enhanced landscape and woodland corridors are provided within the site. These areas have been reviewed by a lighting specialist to ensure that dark zones are delivered and the depth of landscape and ecological buffers provided sufficiently accords with 'Trowbridge' guidance provided by Natural England. In addition, a legal agreement to plant an area of 1.6ha at Stansted Park will provide a net benefit to bat habitat, providing greater connection between the site and Southleigh Forest.

f. The development enhances the relevant Local Ecological Network opportunity areas and safeguards the connections between the protected landscapes of the South Downs National Park and the Chichester Harbour AONB;

The residential development replaces horse pasture of low ecological value. Proposals for significant on-site and off-site planting ensure a net biodiversity gain. The landscape-led layout defined by ecology corridors ensures a sensible transition between urban and rural, this being supported by a sensitive lighting strategy designed further to discussion with South Downs National Park Authority (SDNPA) Officers. The provision of wide, well-planted landscape buffers at the site edge and a perimeter block approach that further recesses housing into the centre of the site behind footways, cycle paths and rural lanes ensures that development is self-contained and does not unacceptably detract from the National Park or AONB.

g. Opportunities have been explored for the prior extraction of minerals to the satisfaction of Hampshire County Council;

A Minerals Resource Assessment has been undertaken for the site and accompanies this planning application. This assessment confirms that, whilst the site is within the Minerals Consultation Area (MCA), the MCA extends beyond the safeguarded minerals area and includes a buffer zone. The site falls within this buffer zone and not actually within the safeguarded area.

Furthermore, the assessment considers that it would not be appropriate to extract brick clay from the site because there are residential properties within and adjoining the site. Consequently, it is considered that there would be no realistic prospect of planning permission ever being granted for clay extraction.

h. Off-site water mains reinforcements are installed to Portsmouth Water's design and approval;

Engagement with Portsmouth Water are being undertaken as part of the planning application process with a view to agreeing requirements during the outline and following reserved matters stages.

i. The proposal considers and positively responds to the special qualities of the South Downs National Park, including consideration of the Dark Night Sky Reserve;

To ensure required consideration of the Dark Night Sky Reserve (DNSR), engagement has taken place with SDNPA Officers to underpin the Lighting Strategy for the development, with additional co-ordination undertaken between lighting and ecological consultants to consider lighting implications upon on-site landscape buffers. Accordingly, landscape buffers around the site have been increased and designed to be dark to be suitable for use by many flora and fauna in particular Bechstein's bat species. Whilst the site is non-prominent and well-screened, expansion of the landscape buffer provides for enhanced mitigation.

j. The developer provides a drainage solution on site which reduces surface water run-off and contributes towards identified flood alleviation schemes in

the area, in line with Policies E19 and E20; and

The scheme will deliver reduced flood risk to Long Copse Lane, which in turn will reduce flood risk to existing properties on the south side of the lane. Policy H8 refers to a known drainage capacity issue in the area adjacent to the site and the historic flooding downstream in Long Copse Lane and Redlands Lane, which will be resolved by the proposals through provision of a culvert within the public highway. In addition, a series of substantial SuDS basins on site, measuring 5,280m², will manage on-site drainage and reduce potential for off-site runoff.

k. The design and layout:

i. Responds to the semi-urban/rural character of the surrounding residential development to the south;

A landscape-led illustrative masterplan has been devised to provide a density that responds sensitively to its context. Within the application site, the proposed housing density is 26.4 dph, which is considered appropriate to the edge of settlement location and broadly comparable with estate properties at the edge of Emsworth.

ii. Preserves and, where possible, enhances the character and setting of Hollybank House;

The illustrative masterplan has been designed to respect the setting of the identified heritage assets, with development consciously set back from the western boundaries of the site. The boundary would also be reinforced by proposed landscaping to limit any visual effects of development. Heritage specialist have been involved at an early stage in the design process to ensure that the proposals will successfully preserve the setting and significance of the listed buildings and the gardens as a non-designated heritage asset.

iii. Retains and integrates the protected and existing trees and hedgerows found on and surrounding the site and leaves a substantial landscape buffer between the development and the ancient woodland of Southleigh Forest to the west and north;

The Arboricultural Impact Assessment identifies very limited tree removal associated with the project. Against this, existing woodland, tree belts and hedgerows are proposed to be strengthened with significant on-site planting. As determined during the course of discussions with Natural England, a series of substantial landscape buffers have been provided between the development and the site perimeter, including a substantial buffer to the ancient woodland of Southleigh Forest.

iv. Provides on-site public open space and community food growing provision in line with Policy E9;

More than 6ha of land is proposed within the 14ha site for open spaces and landscaping. The Green Infrastructure Plan identifies how the land and uses are to be distributed within the landscape-led scheme.

v. Provides play space for children and young people to address the deficit highlighted in Policy E11;

An onsite Neighbourhood Equipped Area of Play (NEAP) is proposed to meet the requirements of Policy E11. In addition, there are substantial areas of open spaces, connected by footpaths and walkways which help meet Sport England Active Design principles for residential development.

vi. Provides landscaping between the built development and the undeveloped land to the east to soften the visual impact;

The proposed illustrative masterplan identifies a significant buffer on the eastern edge of the site. This location is subject to further landscape strengthening and has been extended and will be subject to a lighting

strategy further to engagement with Natural England and the SDNPA.

vii. Provides easy and convenient multi-user links across the site and connecting to existing and planned routes, including those linking north to the Southleigh Forest and the South Downs National Park (Havant BOAT 66a and Havant Bridleway 66b), and those connecting with Emsworth to the south (Havant Footpath 67)“.

The application site provides a direct link to Havant Footpath 67 which will be upgraded to accommodate cyclists. The illustrative masterplan further enables the phased provision of off-street pedestrian link and footpath on the western end of Long Copse Lane. The Highway Authority has confirmed the acceptability of this approach.

- 4.47 More detailed responses to support the information provided above is set out later within this section.

Delivering Sustainable Development

- 4.48 Policy DM1 of the emerging Local Plan identifies the objectively assessed housing need to be delivered in the Borough to 2037. Of the 10,433 dwellings identified, 4,753 are to be delivered via the various site allocations identified including Policy H8 of which this site forms part.
- 4.49 The Council currently has 4.4 years housing land supply and also has concerns regarding meeting housing delivery tests, hence the recent production of an Action Plan.
- 4.50 In addition, the Council has conducted exhaustive calls for sites to establish which land in the Borough is available for development and has allocated sites only on grounds that they meet the tests of being deliverable or developable in the NPPF.

4.51 The revised housing trajectory identifies that the buffer shown on Table 2 of Policy H8 has been revised downwards from 340 homes to 212. The Council recognises that providing a buffer is necessary to ensure that the Plan is sufficiently flexible to accommodate needs not anticipated in the Plan and to allow a rapid response to economic changes in accordance with the NPPF.

4.52 With a small buffer in place and few alternatives to rely upon in terms of bringing forward meaningful development, it is clear that delivery on proposed allocations is both necessary and should not be subject to delay. In this regard, a successful application for 210 homes that form the majority part of Policy H8 would greatly assist the Council in meeting stated housing need and on this basis it is considered that the proposals strongly accord with policy requirements.

Ecology and Nature

4.53 Core Strategy Policy CS11 Protecting and Enhancing the Special Environment and Heritage of Havant Borough seeks to protect and enhance the Borough's natural environment, and that the new development required in the Borough ensures that such protection is afforded and utilised as an asset to generate higher quality development. Furthermore, emerging Local Plan Policy E14 states that planning permission will only be granted if the development results in a biodiversity net gain, that the ecological value of the site has been adequately assessed and any matters arising addressed in an avoidance or mitigation plan.

4.54 A comprehensive Ecological Baseline Survey has been undertaken of the site over several survey periods, in order to fully understand the ecological context of the site. Further species specific, detailed assessments have also been undertaken, as follows:

- Bat Activity Surveys
- Bat Emergence Surveys
- Barbastelle bat radio tracking surveys

- Great crested newt surveys
- Dormouse surveys
- Reptile surveys

4.55 Data searches and on-site ecology surveys have been undertaken on the site since 2016. These have been regularly updated including further key habitat surveys in 2020 and 2021 and for specific taxa including, bats, birds, reptiles, amphibians, and dormice. The scope of surveys and key findings have been shared with Natural England and the HCC Ecologist to support the development of a suitable mitigation and ecological enhancement strategy as part of the scheme.

4.56 The proposed development site is dominated by improved/semi-improved grassland currently grazed by horses. Two ponds and small areas of broadleaved woodland also occur on site. No great crested newts and no significant bird species have been found using the site. A low population of reptiles and dormice occur on the site. The latter are confined to the northern boundary of the site adjacent to Stansted Forest. The main ecological importance linked to the site are the areas of ancient woodland that border the site to the north and west. In addition, these habitats are known to support Bechstein's bats.

4.57 Specific radio tracking surveys of Bechstein's bats in 2017 and 2021 have confirmed the use of the northern and eastern woodland/tree line boundaries for commuting and foraging. Previous records of this species from 2009 have shown use of the copse towards the centre of the southern boundary of the H8 allocation site. However, the majority of Bechstein's bat activity occurs well off the proposed development footprint to the north, east and south.

4.58 The development will deliver a net biodiversity gain, through extensive on site and off site ecological enhancements tailored to the species found in surveys, including that related to the substantial on-site SuDS measures and landscaped areas proposed, plus the mitigation land at Stansted Park which is detailed later in this document. A biodiversity metric calculation is appended to the Ecological Impact Assessment to demonstrate how net gain can be achieved.

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- 4.59 The proposed scheme has also been subject to significant engagement with Natural England and HCC Ecology, as set out in earlier sections. This engagement has enabled greater understanding of requirements for ecological and landscape mitigation, which have then been built into the illustrative masterplan. The consequent changes to the scheme to enhance ecological corridors and landscape buffers and to provide further consideration to lighting strategy to ensure that dark zones are provided at site edges is a fundamental part of the design philosophy.
- 4.60 The illustrative masterplan consequently identifies large landscaped public, semi-public and private areas, exceeding normal buffers to reflect best practice which have been designed to improve habitat quality and ecological connectivity, especially for Bechstein’s bats.
- 4.61 Lighting design and management will ensure these buffers remain dark and meet the requirements of nocturnal species, exceeding the best practice approaches. This site mitigation approach has been discussed and supported in principle by Natural England and the HCC Ecologist.
- 4.62 Further to an impact avoidance, on-site mitigation and enhancement approach, the proposed development of the site will also result in the creation of 1.6 ha of new, off-site woodland habitat specifically for Bechstein’s bat increasing overall roosting and foraging habitats for the wider population of this important species, as well as strategically linking Southleigh and Stansted Forest with new connective planting.
- 4.63 This major enhancement approach has been formally agreed with the nearby Stansted Park Estate and is supported by Natural England and the HCC Ecologist. A context plan showing the proposed nitrate mitigation and bat habitat creation on the Stansted Park Estate is reproduced overleaf and is also submitted as part of the planning submission package.
- 4.64 Further to discussions with Natural England and the Council, it is further intended to use landscape buffer areas within the site for Bechstein’s bat mitigation, but also for these to provide a dual benefit through provision of

permanently wet SuDS areas to assist with flood alleviation and on-site nitrogen offset. This integrated approach, using substantial landscaping within the scheme, will enable increased biodiversity, which in tandem with an 8 hectare area of off-site tree planting will ensure very significant net biodiversity gain attributable to the development proposals.

- 4.65 During discussions with the Council it was determined that there was a preference for onsite mitigation wherever possible. Concurrent engagement with Natural England identified the need for bat mitigation. The team therefore considered options before determining on an off-site solution that could cater for both Bechstein's and nitrates.
- 4.66 Whilst it would be technically possible for the application site to provide for all the required nitrate mitigation this would require specialist foul processing systems and the Environment Agency has stated a preference for use of the sewage network.
- 4.67 Further, the landscape concept does not suit concentrating SuDS primarily on nitrogen removal, it seeks to integrate the SuDS with green infrastructure that performs other functions: for leisure, for visual amenity, for biodiversity. On this basis, and as there was an opportunity to create strategic mitigation for Bechstein's, it was considered preferable to have this combined with water quality mitigation as well.
- 4.68 The on-site landscape approach therefore has a role to play in nitrogen removal, but is seeking to meet a number of other ecological and biodiversity requirements. In this regard, a solution to do what is reasonable and practical but combined with off-site mitigation where the greatest benefits can be achieved has been pursued.
- 4.69 As a result of the detailed assessment undertaken and supporting engagement, it is considered that the ecological importance of the site is fully understood. Together with the landscape and arboricultural context of the site, considered below, the ecology of the site has shaped the development proposals as submitted. It is considered that the proposed development can be acceptably

accommodated without significant detrimental impact to the ecology of the site, including Bechstein's Bats, as required by Policy CS11 and emerging Policies E14 and E15.



4.70 The development will therefore not have any direct effects on significant ecological issues occurring on site and indeed will provide major opportunities for ecological enhancements in a local context. The approach taken directly addresses all the requirements of Policies EX1 and E14 and E15, as informed by the engagement undertaken.

Landscape and Visual Impacts

- 4.71 The application site is located within an area currently comprising pasture to the south of a larger mature woodland and to the north of Emsworth and approximately 0.5k to the west of the village of Westbourne. The site is not located within any designated landscape however it is approximately 0.5km away from the South Downs National Park to the north and east and 2km from Chichester Harbour AONB to the south. There is a listed building (Hollybank House) adjacent to the western boundary of the site.
- 4.72 Emerging Local Plan Policy E3 provides detail on landscape proposals in new development, and the interaction between built-up and undeveloped areas. It is considered that *"What is important is that new development respects its surroundings and makes the most of attractive and distinctive landmarks and features to enhance what is special about the character of the Borough as a place"*.
- 4.73 Additionally, emerging Emsworth Local Plan Policy D4 states that *"developments should create welcoming and inclusive neighbourhoods, promote active travel, enable the successful integration of the built form within its surrounding area...and deliver wider benefits to residents, such as access to shared amenity space and high-quality public realm."*
- 4.74 In defining the landscape strategy, a comprehensive Landscape and Visual Impact Assessment (LVIA) has been undertaken to consider the impacts of the proposed development on landscape character and visual amenity.
- 4.75 In considering the benefits the scheme can bring to the area, the proposals seek to create a strong landscape structure that draws on the distinctive, local wooded character.
- 4.76 The increased woodland cover will strengthen this character as well as promoting biodiversity which will provide enhancement to the site compared with the existing conditions.

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- 4.77 The Green Infrastructure strategy, as set out below and discussed in further detail later in this section, will also provide recreational amenity and the introduction of features such as sustainable drainage features will also assist in delivering a sustainable development.
- 4.78 The landscape-led strategy for the site will, therefore, in combination with existing vegetation assist in integrating the development into its setting in its immediate context and will complement the wider context including the setting of the South Downs National Park (SDNP).
- 4.79 The nature of the existing site and its surrounding context including the relationship with the SDNP; proximity to Ancient Woodland and views from public rights of way have also all been carefully considered. As a 'greenfield site' the inherent landscape characteristics are recognised and it is acknowledged that any development on the site will result in landscape and visual effects. Proposals for new homes on the site, therefore, should positively address the context and seek to mitigate any adverse effects.
- 4.80 Informed by the Landscape and Visual Impact Assessment (LVIA) along with the constraints and opportunities resulting from interrelated aspects concerning *inter alia* ecology, drainage, highways and access, an illustrative masterplan for some 260 homes has been prepared, supported by a number of constraints plans and parameter plans to identify the design philosophy underpinning assumptions.
- 4.81 As the site is around 0.5 km from the nearest boundary of the SDNP and some 2km from the Chichester Harbour AONB, the illustrative masterplan has also sought to address any landscape considerations including the need to limit lighting to reduce any impact on the Dark Skies Reserve. Whilst the site is located outside the Dark Skies transition zone (the least sensitive zone), consultation between the South Downs National Park Authority (SDNPA) and the Council prior to EiP identified concerns regarding proximity of development to the National Park and consequently Policy H8 was amended to require further consideration of this matter.

4.82 Consequently, following consultation with SDNPA officers, a lighting strategy has been prepared to consider the proposal in relation to the Dark Skies Reserve. The strategy has reviewed baseline lighting levels and suggested a series of lighting mitigation measures as set out in the Lighting section later in this document.

4.83 The approach to the illustrative masterplan has been to integrate the new housing into the landscape through the development of a Green Infrastructure Strategy which takes the existing landscape context as a starting point to design a multi-functional setting that will result in a range of landscape and environmental benefits. The Green Infrastructure approach for the site addresses interrelated elements summarised below:

- **Existing trees, vegetation and habitat retention/creation** – existing vegetation makes an important contribution to the landscape and biodiversity of the site. The illustrative masterplan has been developed around the retention of existing trees, hedgerows and bat corridors with new planting proposed to create a range of connected habitats along wide primary corridors running north and east west following retained and strengthened existing field hedgerows which will deliver both landscape and ecological benefits. Appropriate offsets are provided to the Ancient Woodland to the north and listed buildings to the west and a mitigation strategy developed to address protected species such as bats will include planting of substantial areas of new woodland within multi-functional green corridors.
- **Integration with Long Copse Lane** – to minimise impact on trees, protecting all the mature oaks, and to retain the rural character of Long Copse Lane through setting housing well back from carriageway and use of SuDS to create buffer space between the Lane and the housing.
- **Water sensitive design (including SUDs)** – creating a multi-functional landscape and sustainable development with features designed to manage water quality through nitrate removal and enhance biodiversity as well as providing stormwater attenuation.

- **Provision of play and recreation** – play and opportunities for recreation are embedded throughout the illustrative masterplan, to promote healthy living and outdoor activities for people of all ages and follows policy requirements based on FIT Standards and Play England guidance.

4.84 As noted earlier in this section, a detailed LVIA has informed the illustrative masterplan. Due to a combination of existing woodland, vegetation along Long Copse Lane, and the existing built-up area to the south, there are only limited views into the site from public rights of way and any public viewpoints within the SDNP are only long-distance views.

4.85 Mitigation will be provided as part of the overall Green Infrastructure Strategy which includes the retention of vegetation, including along Long Copse Lane, substantial woodland planting and an amendment to the illustrative masterplan to positively respond to SDNPA comments during the Local Plan process, which will create a generous landscape buffer along the eastern boundary. This will include larger growing trees and native species planting. The buffer, (which also includes SUDs features and contributes to the strategy for bat movement corridors), will over time, restrict visibility towards the new houses (and reduce night-time effects) from the SDNP.

4.86 Similarly, whilst views are limited to the immediate surroundings, and new properties will generally only be visible in views filtered through existing and proposed vegetation, the change to a residential development results in a localised negative effect on visual amenity from some receptor locations, when compared with the existing baseline, though this will be reduced overtime as new planting, in particular, establishes throughout the site and along its boundaries. As the woodland corridors extending through the site become established the development will become assimilated into its landscape setting.

4.87 Furthermore, whilst the development will change the site itself, and notwithstanding the localised adverse landscape effects as assessed for the character area within which it sits, it is considered that the proposed development, including the landscape green infrastructure enhancements, will

not result in harm to the wider setting and therefore overall the proposals will have a negligible effect on the setting of the SDNP.

- 4.88 In view of the above, it is considered that the proposed development meets the requirements of the Development Plan in relation to landscape protection and enhancement.

Arboricultural Impact

- 4.89 The planning proposals are informed and supported by a detailed Tree Survey, Arboricultural Impact Assessment (AIA) and Tree Protection Plan (TPP). Similarly to the ecological and landscape implications of development of the site in particular, on-site and perimeter trees and hedging form parameters for the scheme.
- 4.90 The AIA confirms that four trees should be removed irrespective of the development proposals due to their poor condition. The development proposals would require the removal of other trees and hedgerows, but all were considered to be acceptable works within the context of the proposed development. This is as a result of the negligible visual impact that is considered to be the result of their removal.
- 4.91 Some tree removals have been agreed as part of the site access strategy which identifies one category A highway tree to be removed, two category C trees and four groups of smaller category C trees to be removed. The AIA also includes a CAVAT valuation for the highway trees to be removed which has been agreed between the site promoter and the highway authority through the Section 278 Design Checking process.
- 4.92 The proposals also identify very significant tree planting to strengthen existing woodland areas, landscape buffers and green corridors within the site. Provision of street trees and within open spaces throughout the illustrative masterplan will enable a sylvan location to emerge, providing a low-density transition from urban to rural.

4.93 As such, it is considered that the proposed development and the associated identified tree works are acceptable in accordance with Core Strategy Policy CS13 Green Infrastructure. This policy seeks to prevent development from undermining the functional integrity of the green infrastructure of the Borough. The proposals also meet the requirements of emerging Local Plan Policy E18 Trees, Hedgerows and Woodland which requires development affecting trees and hedgerows to reflect, conserve or enhance the existing landscape and to integrate into its surroundings.

Heritage

4.94 Core Strategy Policy CS11 and emerging Local Plan Policy E13 state that planning permission will be granted where proposals protect and enhance the heritage assets of the Borough. A Built Heritage Assessment and an Archaeological Assessment have therefore been undertaken.

4.95 The Built Heritage Assessment confirms that the site contains no designated heritage assets, although it lies in some proximity to two Grade II listed buildings at Hollybank House. The gardens of this house have separately been recognised on Hampshire’s Local Register of Historic Parks and Gardens, and have been treated as a non-designated heritage asset for the purposes of this application.

4.96 It has been established in the course of this assessment that there was some historic association between Hollybank House and the site through their shared ownership by Catherine Mundy during the mid-nineteenth century. Aside from this historic association, the site makes no particular contribution to the manner in which the listed buildings at Hollybank House are appreciated, which are set within inward facing gardens with the only outward views relating to the south and distant views of the sea.

4.97 The proposed illustrative masterplan has been designed to respect the setting of the identified heritage assets, with development consciously set back from the western boundaries of the site. The boundary would also be reinforced by

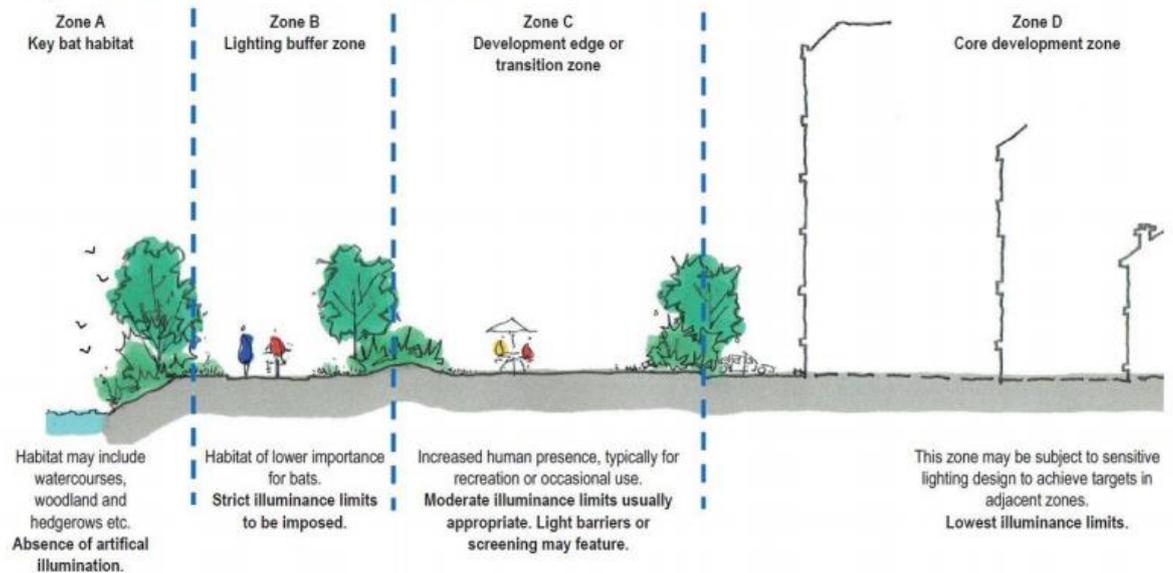
proposed landscaping to limit any visual effects of development.

- 4.98 Therefore, it is considered that the proposals would successfully preserve the setting and significance of the listed buildings and the gardens as a non-designated heritage asset.
- 4.99 With regard to archaeology, the assessment identifies a low potential for the site to contain any previously unrecorded buried archaeological remains of interest dating to all periods.
- 4.100 As such, the proposals would therefore accord with the requirements of Core Strategy Policy CS11, emerging Local Plan Policy E13 and Policy H1 of the emerging Emsworth Neighbourhood Plan.

Lighting

- 4.101 The proposed policy allocation of the application site, Policy H8, requires that a Lighting Assessment is submitted as part of any planning submission in order to address the impacts of lighting the site in general and specifically in relation to the Dark Night Sky Reserve. Further, Policy DM10 Pollution requires that external lighting is of the minimum level of illumination and duration required for security and operational purposes.
- 4.102 A Lighting Strategy has therefore been developed to inform the illustrative masterplan process to ensure that the proposed lighting design can be implemented in a manner that meets dark skies requirements and also supports the on-site mitigation necessary to support Bechstein's Bats. In this manner, the lighting strategy has been developed to provide a transition from the built-up area to the countryside and bat corridors/foraging areas, as set out overleaf.

Example of illuminance limit zonation



4.103 In consideration of the above, it is evident that a lighting scheme that appropriately protects the surrounding landscape and supports ecological mitigation measures can come forward in accordance with emerging Local Plan Policies E15 and H8 and Policy D7 of the emerging Emsworth Neighbourhood Plan. The applicant is also willing to accept an appropriately worded planning condition to govern the detail of lighting to be implemented as part of the development.

Flood Risk and Drainage

4.104 The proposed development at the Policy H8 site is shown to be located well within Flood Zone 1 of the Environment Agency’s (EA) map for planning i.e. having a low probability of flooding from fluvial sources. As stated in HBC’s Strategic Flood Risk Assessment (Local Plan Sites), the Policy H8 site passes the Sequential and Exception Tests set out in the National Planning Policy Framework.

4.105 Core Strategy Policy CS15 Flood and Coastal Erosion Risk and emerging Local Plan Policies E19 and E20 set out the Council’s requirements for new development and require that site-specific flood risk assessment demonstrates

that the development will be safe and, where possible, reduce overall flood risk. Furthermore, all development will be required to ensure that there is no net increase in surface water run off. SUDs are required as part of the drainage strategy unless there is evidence that this would be inappropriate.

- 4.106 The scheme will deliver reduced flood risk to Long Copse Lane, which in turn will reduce flood risk to existing properties on the south side of the lane. Policy H8 refers to a known drainage capacity issue in the area adjacent to the site and the historic flooding downstream in Long Copse Lane and Redlands Lane. In terms of water catchment, the site contributes to the West Brook and River Ems wider catchments. Under Emsworth Flood Risk Strategy Review, the frequency of recent flooding events has resulted in the Environment Agency identifying Emsworth as a priority area. Managing the flow of water on both River Ems and West Brook has been flagged as mitigation measures to reduce the probability of flooding in Emsworth. According to Policy DM25 of HBC Local Plan (Allocations), developments within the Emsworth urban area boundary will have to demonstrate how post development runoff is reduced.
- 4.107 In terms of the local drainage capacity issues referred to under Policy H8 of the Local Plan, there are some legacy issues with the drains to some of the existing properties south of Long Copse Lane. Unrestricted surface water flows off the land north of Long Copse Lane (currently without development and without any attenuation) exacerbate surface water flows on to the Highway and then subsequently over into property on the south side of the road. Following feedback from the public consultation process and following site visits with residents, the issue has been diagnosed and is very local. The development will resolve this issue.
- 4.108 The agreed highway drainage improvements to Long Copse Lane carriageway delivers wider community benefits as it enables new infrastructure, to drain natural flows and run-off from much of the carriageway, which alleviates some of the loading on the existing public surface water drainage system to the south of Long Copse Lane. The new highway drains, to be provided as part of the carriageway improvements, would receive both the flows from the carriageway gullies, and also the runoff from the land north of Long Copse Lane (which

following development would then be attenuated). The outfall would be into a basin system owned and maintained by Havant Borough Council. This approach is agreed with HCC (as Local Lead Flood Authority) and HBC (as Local Planning Authority). Both parties appreciate that these improvements are expected to provide a significant betterment for those residents who are at the low point 'hot spot', where flooding does periodically occur.

- 4.109 The management of the storage and conveyance of the surface water volumes and flows is provided as part of the Drainage Strategy which proposes a series of attenuation basins. The location, design and size of these basins not only accord with CIRIA C753 SuDS Manual, but also contribute to the landscape and ecological requirements of the site, providing nitrogen offset and net biodiversity gain, as discussed elsewhere in this document.
- 4.110 The proposed site-specific drainage strategy will manage the surface water run-off and attenuate on site, thereby protecting the development and any downstream land. This approach protects the development over its lifetime and reduces runoff discharged from the area during intense rainfall events, therefore reducing the risk of flooding to the town of Emsworth – in line with Policy E19 and E20 of the emerging Local Plan.
- 4.111 The foul drainage strategy is set out within the Utility Statement. Southern Water has confirmed that the existing foul sewerage network has the capacity to receive foul flows from the development. A single new pumping station will be required.

Minerals

- 4.112 The proposed allocation in the Emerging Local Plan requires that opportunities are explored for the prior extraction of minerals to the satisfaction of Hampshire County Council before non-minerals development can neutralise the minerals potential of the site. This is due to the fact that parts of the site fall within Minerals Consultation Areas (MCA), defined in the Hampshire Minerals and Waste Plan (HMWP), in relation to sand and gravel, and brick clay.

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- 4.113 In order to address the requirements of Policy 15 of the HMWP, a Minerals Resource Assessment has been undertaken for the site and accompanies this planning application. This assessment confirms that, whilst the site is within the MCA, the MCA extends beyond the safeguarded minerals area and includes a buffer zone. The site falls within this buffer zone and not actually within the safeguarded area.
- 4.114 Furthermore, the assessment considers that it would not be appropriate to extract brick clay from the site because there are residential properties within and adjoining the site. Consequently, it is considered that there would be no realistic prospect of planning permission ever being granted for clay extraction. Paragraph 6.14 of the HMWP states that it is important to safeguard viable mineral resources from needless sterilisation, and that is clearly the purpose of the safeguarding policy. Since it is clear that there is no realistic prospect of planning permission ever being granted for clay extraction from this site, the clay is not a viable mineral resource and does not warrant safeguarding to the exclusion of any other form of development.
- 4.115 In addition, criterion D of Policy 15 of the HWMP confirms that prior extraction of the mineral does not have to be undertaken if the need for development outweighs the safeguarding of the mineral. In the light of the above that the site would be inappropriate for minerals development, it is considered that the need for the site to deliver housing would significantly outweigh the minerals safeguarding of the site.

Transport and Access

- 4.116 The scheme at Long Copse Lane, whilst in outline, has been subject to rigorous technical review to ensure that the scheme can be acceptably delivered.
- 4.117 A Transport Assessment accompanies the planning application submission. It has fully considered the transport implications of the proposed scheme, including the levels of traffic anticipated to be generated, and the specific highways design of the proposals. Consultation in this regard has been

undertaken with Hampshire County Council as Highways Authority, West Sussex County Council as the adjoining Highways Authority, and Highways England.

4.118 The assessment considers that the development generated traffic can be accommodated on the local highway network and the residual impacts of the development falls short of the “severe” test set by the NPPF. Furthermore, safe and suitable access will be provided and opportunities for sustainable travel have been taken up.

4.119 To best consider scheme requirements, a Pre-Application Scoping Report was submitted to HCC in 2018. It was agreed that a Transport Assessment would review the opportunities to walk to local facilities to ascertain whether these facilities can be safely accessed, or whether improvements along these walking/cycling routes will be necessary.

4.120 As a result, a package of local walking and cycling improvements has been designed and will form part of the development proposal, including:

- A pedestrian link through the eastern part of the site allocation to connect to Wraysbury Park Drive;
- A pedestrian / cycle link to Redlands Lane (FP67);
- Width, alignment and surfacing improvements to Redlands Lane (FP67);
- A 3m shared-use footway cycleway between Redlands Lane (road) and the Hampshire Farm (Skylark) development; and
- A pedestrian connection through the western part of the site allocation connecting to a new footway along the western part of Long Copse Lane to connect to the existing footway in Hollybank Lane (to be delivered separately and when the western phase 3 developed).

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- Improvements to Long Copse Lane including better road geometry, forward visibility and carriageway width;
 - The opportunity for HCC to consider further improvement works (which have been designed by the applicant) in Wraysbury Park Drive;

- 4.121 These improvements have been agreed and approved through HCC's Section 278 preliminary design checking process. The Section 278 design checking process involves a rigorous multi-disciplinary approval process which HCC required at an earlier stage of the planning process than is normally the case. This was required to provide certainty that the access strategy and road widening can be achieved and delivered within land that is either public highway or that is within the site allocation.
- 4.122 A subsequent position statement between the applicant and Highways Authority has been signed to evidence support for the proposals.
- 4.123 A sustainable transport strategy is also provided as part of its planning application which includes consideration of the wider offsite connectivity.
- 4.124 The application is also supported by a Framework Travel Plan in line with HCC's Developer Related Travel Plan Guidance to encourage residents to reduce car use and utilise sustainable transport options.
- 4.125 To ensure a safe and suitable access, the H8 site will be accessed by two priority junctions on Long Copse Lane – one in the east and one in the west. The access strategy also involves some widening of the highway along Long Copse Lane and Hollybank Lane and delivery of the works listed above.
- 4.126 This has been developed in conjunction with HCC and HBC and agreed to the satisfaction of HCC under its Section 278 Preliminary Design Checking process which takes account of several factors such as the extent of adopted highway, ecology, arboriculture and engineering. The agreed site access strategy can either be delivered comprehensively or in two parts (as in this case).

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- 4.127 The agreed road widening can be delivered within the adopted highway – this has been carefully designed to avoid the use of highway land to the south of Long Copse Lane which has, over time been encroached upon by some of the frontages – for the avoidance of doubt the agreed scheme does not require the use of any highway land that has been encroached upon. The agreed site access strategy, the extent of adopted highway and extent of land that will be dedicated as public highway is shown on drawing ITB13525-GA-105 Rev A.
- 4.128 The access strategy also has cross-discipline / cross authority support for an integrated strategic surface water and highway drainage solution on Long Copse Lane as well as a suitable arrangement for the ongoing maintenance of the proposed off-site drainage infrastructure.
- 4.129 A Stage One Road Safety Audit of the proposed access arrangements has been carried out, all matters raised by the Auditor have been addressed to his satisfaction and this has been confirmed by HCC in its Section 278 Design Check report covering the site access strategy.
- 4.130 Personal Injury Accident data has been obtained from Hampshire Constabulary for a five-year period for the local highway network in the vicinity of the site. There have been no injury accidents recorded along the corridor between Hollybank Lane, Long Copse Lane, Wraysbury Park Drive and the junction of Long Copse Lane / North Street in the five-year period.
- 4.131 The traffic generation of the H8 site has been discussed and agreed with HCC as part of the pre- application discussions.
- 4.132 The distribution and assignment of the development generated traffic has been discussed with HCC as part of the pre-application discussions. As requested by HCC, the Transport Assessment to support a future planning application will include a sensitivity test to assess the impact of development traffic on Long Copse Lane if Wraysbury Park Drive were to be closed off to vehicular traffic in the future. A scheme to show how Wraysbury Park Drive could be closed to vehicular traffic has been designed for HCC to consider. Although the completion of this development is not dependant on the implementation of any

such proposals.

- 4.133 As part of pre-application discussions, Highways England were approached regarding the development impact at the A259 / A27 dumbbell roundabouts, i.e. the nearest part of the Strategic Road Network located approximately 3km west of the site. This work showed that the development of the H8 site will result in less than a 2% increase in traffic at this junction and Highways England have confirmed in writing that they do not require any further analysis.
- 4.134 HCC / HBC have prepared an improvement scheme for the A259/A27 junction as part of the work supporting the HBC Local Plan and the future planning application determination for this site will allow for a consideration of how the H8 site could help bring forward this improvement.
- 4.135 Pre-Application engagement has been completed with West Sussex County Council (WSCC) as the County boundary lies to the eastern end of Long Copse Lane. The H8 site development peak hour impact on WSCC's network is quantified at 22 two-way movements through the North Street junction in the morning peak and 26 two-way movements in the evening peak. WSCC have agreed that no junction modelling is required.
- 4.136 As such, it is considered that the proposed development therefore accords with Core Strategy Policy CS20 Transport and Access Strategy, emerging Local Plan Policy IN3 Transport and Parking and the NPPF, which require, in particular, that safe and suitable access to the site is provided for people for all modes of transport, that the safe and convenient movement of pedestrians and cyclists within the site, and that pedestrian and cycle routes are provided which conveniently reach all parts of the site, and link with the wider network beyond the site, providing a high level of permeability.

Parking and Cycle Parking

- 4.137 Land available at the application site allows for a generous, medium net density scheme to come forward within a landscape-led environment. On the basis of

the proposed mix, adequate spaces are provided for in the illustrative masterplan to ensure that a policy-compliant scheme can come forward.

4.138 Parking will be sited on plot behind building lines, within garages or under-croft spaces, in integrated on-street parking and in parking courts behind building lines. The objective being, to minimise the visual impact of car parking within the development, as much as possible. The use of parking courts will be limited in scale, served by direct paths into gardens and due to the layout proposed will enable direct overlooking from habitable rooms.

4.139 It is proposed to provide all houses with EV charging points in line with emerging Local Plan policies. This will be supplemented by shared EV charging points in the parking courtyards and some on-street charging points for visitors, the detail of which can be agreed as part of reserved matters.

4.140 With regard to cycle parking, will be provided for the dwellings. When a secure facility, such as a store or garage associated within a property cannot be provided, such as within an apartment, dedicated secure cycle parking will be provided.

Other Environmental and Technical Considerations

Air Quality

4.141 Policy DM10 Pollution of the Core Strategy states that development that may cause pollution through smoke, fumes and other pollutants will only be permitted where a number of criteria are all met, including that the national air quality standards would not be breached.

4.142 An Air Quality Assessment has been undertaken in support of the proposed development and accompanies the planning submission. It concludes that during the operation phase, modelling within the Air Quality Assessment predicts that there will be no exceedances of the nitrogen dioxide or particulate matter objectives at the sensitive development receptors on the proposed

development site.

- 4.143 The modelling also predicts that there will be negligible increases in nitrogen dioxide and particulate matter at existing sensitive receptors as a result of the proposed development and that pollutant concentrations will remain significantly below the air quality objective levels. Therefore, no mitigation is required. As such, the proposals will meet the requirements of Policy DM10 and emerging Policy E23.

Sustainability

- 4.144 Whilst in outline, in line with the approach taken on other scheme aspects to ensure that a robust and deliverable scheme can emerge, a sustainability assessment has been undertaken to consider how best to provide a framework within which later development can come forward in line with the requirements of emerging Local Plan Policy E12, which seeks to optimise efficient use of resources and low carbon design. Further to the assessment undertaken, the approach can be summarised as follows:

- Climate Mitigation - The scheme will exceed building regulations standards by adopting a hierarchical approach to energy and carbon. A hierarchy is set out in the statement which will be followed at reserved matters stage. An illustrative energy assessment has been completed which indicates how the scheme may exceed building regulations standards incorporate renewable energy to save approximately 20.15% CO2 emissions by comparison to the current Building Regulations. When compared against forthcoming regs, the equivalent scheme would save 65.09%.
- Climate Change Adaptation - The scheme is located within a low flood risk zone. A sustainable drainage scheme has been developed which will enable the development to meet with greenfield runoff rates. In addition, contributions are being offered to support flood alleviation schemes offsite. The scheme will also be incorporate water efficiency measures to reduce consumption to 110 litres / bedspace / day.

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- Sustainable Transport - The scheme incorporates a range of transport measures to reduce impacts from private vehicles. This includes provision of electric vehicle charging, space for the secure storage of cycles and greater pedestrian and cycle permeability.
 - Waste and Resources – To manage the impacts of waste arisings in construction, a Resource Management Plan will be produced to consider options for sustainable material management. It is anticipated that this will form a part of a wider Construction Environmental Management Plan. In operation the scheme will incorporate sufficient waste storage to enable the collection by the local authority.
 - Environmental Protection - The development is not of the scale where a formal Environmental Impact Assessment is required, however the scheme will ensure the appropriate control of any potential environmental effects. Noise and air quality have been considered and mitigation put forward to reduce the potential effects in construction. Furthermore, the scheme will be designed to limit light pollution to preserve the South Downs National Dark Skies Reserve.

4.145 Further detail is provided within the Sustainability Statement and Energy Assessment accompanying this application.

Land Contamination

4.146 Core Strategy Policy DM10 and emerging Local Plan Policy E24 address the impact of contamination on proposed development, stating that development will only be permitted where the health and safety of existing and future users of the site, or nearby occupiers, and an appropriate risk assessment accounts for potential sources of contamination both on and off the site and deliverable measures are provided which ensure that any likely significant negative effect on receptors is mitigated to an acceptable level prior to occupation of the development and residents is not put at risk.

4.147 A Land Contamination Assessment has been undertaken and it confirms that, given the history of the site, there is currently generally a Low to Moderate risk to receptors based on the historical use of the site and a Very Low to Low risk from off-site sources. The risk to construction workers is considered to be Moderate due to there being a risk of workers coming in to contact with potential asbestos or contaminated soils. The risks to workers should be managed through health and safety protocols under Construction (Design and Management) Regulations 2015. There is a Moderate UXO risk at the site.

4.148 The assessment makes a series of recommendations, as follows:

- An intrusive ground investigation should be undertaken at the site, particularly in and around the former buildings;
- An asbestos survey should be undertaken on the buildings, prior to demolition to confirm if asbestos containing material is present; and
- Completion of a detailed UXO assessment report highlighting the potential risk of UXO on the site and/or employment of a UXO clearance engineer during intrusive works, if required.

4.149 Irrespective of the recommendations set out, it is considered that the risks associated potential contamination would not prevent development of the site as proposed, and appropriate mitigation can be provided to any risks that may be identified from the further assessments. As such, the proposals meet the requirement of both Policy DM10 and emerging Policy E24.

Noise

4.150 Policy H8 requires submission of a Noise Assessment, which has been undertaken to ensure the acoustic performance of the scheme and to ensure that target internal noise levels will be achieved.

Housing Mix and Tenure

4.151 As the application is in outline with all matters reserved, our work on mix,

which is in relation to 210 dwellings, has been undertaken to demonstrate the acceptability of residential development, having regard to the allocation number of about 260.

- 4.152 As part of pre-application engagement officers were comfortable with our scheme providing around 210 of the allocation so the technical work set out in the application submission tests this number. As such, the mix is not fixed, but allows the application to set out the assumptions underpinning the illustrative masterplan, which will be subject to market testing by the housebuilder.
- 4.153 The S106 payments we anticipate will be per dwelling type, to give flexibility for Reserved Matters to determine the precise number and mix having regard to up to date evidence.
- 4.154 For the purposes of this application, the indicative housing mix is as demonstrated overleaf.

Unit Type	Affordable Rent	Shared Ownership	Market	Total
1 Bed Units	16	8	13	37
2 Bed Units	17	9	52	78
3 Bed Units	8	3	66	77
4+ Bed Units	1	1	16	18
Total No. of Dwellings	42	21	147	210

- 4.155 The breakdown of housing by unit size and tenure identifies a mix of market and affordable tenures that closely matches that identified in the PUSH SHMA. In addition, 37% of the overall mix is provided as 2 bedroom stock, in line with Policy H4 of the emerging Local Plan.
- 4.156 It is proposed to provide 63 units as affordable housing (30%) in line with Policy H2 of the emerging Local Plan. 21 units will be provided as shared ownership in line with Policy H2 of the emerging Local Plan. The tenure split at 66.6 : 33.3 is broadly in line with the requirements of Policy H2 of the emerging Local Plan. Whilst it may be appropriate to fix the mix and tenure of

the affordable housing element, there should remain some flexibility in the market mix in order to respond to the detailed reserved market proposals.

Housing Density

4.157 The location at the edge of the urban area, adjacent to ancient woodland with the South Downs National Park beyond and the various heritage and ecological constraints in place mean that a generous, landscape-led approach has evolved during the course of pre-application discussions and the Local Plan process.

4.158 The developable area of 8.1ha, means that a mix of 210 homes would result in a net density of 25.9 dph. Whilst this is lower than the densities expected in the emerging Policy H3, which seeks efficient use of land and minimum densities of 40 dph in this locality, it is considered that local circumstances and constraints should moderate consideration of appropriate density and the approach taken here acceptably reconciles the constraints and recognises the edge of settlement location.

Space and Design Standards

4.159 It is important to make the best use of all available land and in this case there will be provided significant Public Open Space, Play Space, and SUDS attenuation, which includes an element of nitrate offset.

4.160 The location and sizing of open and play spaces has been designed to maximise green spaces, both public and private, at the site edges and within central areas. Providing a series of landscape and ecological corridors ensures good separation between existing and proposed built form. The green spaces are well linked to enable walking, cycling and leisure throughout the site without unacceptable severance by roadways and significantly exceed policy requirements and to allow for other policy requirements to be satisfied, such as that related to communal growing in Policy E9 and that related to the public realm in Policy C3 of the emerging Emsworth Neighbourhood Plan.

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- 4.161 In terms of the functionality of garden spaces, the generous plot sizes provided ensure that external amenity space is of a sufficient size to accommodate a storage shed (including a cycle store where no garage provision is possible), space to facilitate the drying of clothes (rotary or washing line), table and chairs suitable for the size of the dwelling, an area for children to play in and circulation space.
- 4.162 Garden depths are all greater than 10m to ensure a reasonable degree of amenity and privacy between dwellings.
- 4.163 There are no significant flatted blocks proposed, although it is envisaged that some maisonettes or apartments could come forward within the built form proposed. Should this be the case, garden spaces of the size proposed would enable a standard of 1.5 sqm of private amenity space per bedroom or 1 sqm of communal space per bedroom to be achieved in line with emerging Policy H1.
- 4.164 Other considerations of Policy E1 and H1 of the emerging Local Plan would be addressed as reserved matters. It is important to confirm, however, that the illustrative masterplan and parameter plans enable a landscape-led development to emerge within which detail will be developed to accord with the requirements of criteria a to k of Policy E1. In relation to Policy H1, 30% of the dwellings can be provided to M4(2) standard and that 2% of the dwellings can be provided to M4(3) standard to ensure the provision of accessible and adapted dwellings within the development.

Infrastructure

- 4.165 Policy IN1 of the emerging Local Plan, which governs the effective provision of infrastructure, states that inter alia *"The Council will work with infrastructure providers and other partners to bring about the strategic infrastructure investment needed in the Borough"*. Later in the policy text, a series of six tests are set out to ensure that delivery covers appropriate mitigation, implementation and ongoing management and maintenance of on-site and off-

site obligations.

4.166 The approach to the site at Long Copse Lane has been grounded in engagement with the Council, statutory consultees and other local stakeholders. As such, discussions with these groups has helped to identify appropriate mitigation for the development, which in turn form our draft S106 Heads of Terms, subject to meeting the legal and policy tests:

1. Provision of 30% on-site Affordable Housing (63 units) at a tenure split of 66:34 (Affordable Rent / Shared Ownership)
2. Provision of on-site open and spaces, as per the illustrative masterplan
3. A contribution towards initial maintenance of open and play spaces
4. Provision of all on-site utilities and drainage infrastructure
5. A contribution towards expansion of Emsworth Primary School
6. A contribution to increase capacity of existing healthcare provision
7. A contribution towards the Solent Recreation Mitigation Project (SRMP)
8. A contribution in relation to upgrading of Redlands Lane to enable cycle rights to be obtained for the route.
9. A contribution towards enhancing the local rights of way network.
10. A contribution towards service/facility enhancements to Bus Service 27.
11. Provision of a land at Stansted Park Estate for off-site bat and nitrogen mitigation improvements (see further detail below).
12. Off-site highways works and improvements, comprising:
 - A site access with 2.4m and 43m visibility splays
 - Long Copse Lane carriageway works to largely achieve 5.5m width where agreed as necessary with the Highway Authority
 - A central non-car access to provide pedestrian and cycle access to Wraysbury Drive
 - A pedestrian connection to Redlands Lane

- Formalisation of existing layby parking area on Long Copse Lane
- Widening of the bend on the approach to Hollybank Lane and new footway verge
- Upgrading of Redlands Lane to remove vegetation and improve surface width to facilitate cyclists and pedestrians

13. Off-site drainage works and improvements, comprising:

- New drainage culvert along Long Copse Lane to address surface water capacity and flooding concerns

4.167 In line with Policy IN5 of the emerging Local Plan, it is intended that a management company will be responsible for management and maintenance of on-site 'common parts', the detail of which can be addressed through discussion with officers during the determination process and secured by planning condition or planning obligation as necessary.

Nitrate Offset and Bat Habitat Mitigation

4.168 The Borough Council seeks to ensure that were possible and appropriate that the increase in nutrients in European designated sites in consequence of the occupation of new homes on the development land are offset on site as far as reasonably possible or practical having regard to optimising the delivery of the allocated number of new homes in the Local Plan policy. The development proposals offer some on site nitrate mitigation, however, it is not practical or possible to deliver the target number of homes and provide all nitrate offset within the application site.

4.169 In accordance with the Council's Position Statement and Mitigation Plan for Nutrient Neutral Development the balance of any nitrate offset should be delivered on land outside the application site.

4.170 In addition to nitrate offset, the applicants are proposing bat habitat creation offsite. This will provide significant net habitat gain to bat species moving in the area of the development site in particular for Bechstein's bats.

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- 4.171 Following pre-application advice with Natural England, the Applicants identified and secured agreement to provide both nitrate offset and bat habitat creation on land to the north of the application site on land owned by Stansted Park Foundation.
- 4.172 The land available is shown on Plan 1, submitted with the application package, but also reproduced in Appendix 1 of this document. The Mitigation Land is subject to an agreement for the Mitigation Land to be used for nitrate offset/mitigation and bat habitat creation between the developer (the Applicant) and the mitigation landowner Stansted Park Foundation.
- 4.173 This agreement imposes restrictions as to the agricultural use of the Mitigation Land in order to address in order to provide the nitrate offset and also the creation of bat habitat.
- 4.174 The Mitigation Landowner agrees to create and protect a woodland bat habitat on the mitigation land in accordance with a planting scheme to be agreed.
- 4.175 The Mitigation Landowner will not use the Mitigation Land for agriculture or deposit or permit the deposit of any fertiliser on the Mitigation Land. The planting and management of trees on the Mitigation Land will be in accordance with an agreed woodland planting scheme. The restriction on the Mitigation Land will be in place prior to occupation of the first home on the development site and will be in place for the lifetime of the development or such other period of the Council requires.
- 4.176 The Mitigation Land will be monitored by the mitigation land authority (which is the planning authority within which the Mitigation Land is situated in this case the South Downs National Park Authority (SDNPA)) and the mitigation land authority will carry out inspections from time to time and report to the Borough Council at agreed intervals (initially annually then every 5 years after 20 years following occupation of the first homes on the development site).
- 4.177 The nitrate offset mitigation and bat habitat creation on the Stansted Park

Estate provides the following key advantages:

- Ensures delivery of the target number of homes within the housing allocation area.
- Complements the onsite bat habitat creation and buffer zones and onsite nitrate offset with significant additional tree planting creating wider biodiversity benefits.
- Avoids drawing down nitrate offset land from the Councils own identified project at Warblington Farm thereby relieving pressure and providing additional capacity for other suitable housing sites.
- Provides direct funding for Stansted Park Foundation to carry out their charitable goals of extending tree planting and restoring habitats within the Stansted Park Estate with consequent wider positive benefits including the long term sustainability of the Estate.

5.0 SUMMARY AND CONCLUSIONS

- 5.1 The application site is a sustainable location for development. There is a presumption of favour of sustainable development embedded in the planning system. Development must accord with development plan policies unless material considerations indicate otherwise.
- 5.2 In this case, the proposals will comply with the key development plan policies, and in particular, Policy H8 of the emerging Local Plan, which allocates this site for development as part of a wider allocation expected to accommodate about 260 homes in total. In this regard, the Council has accepted the site as being suitable in principle, this following on from an earlier invitation as part of the Housing Statement 2016, which was similarly based on several landowners working to a comprehensive masterplan of about 260 dwellings.
- 5.3 Notwithstanding this, the current Development Plan is out of date, there is no 5YHLS and the Council has chosen to produce its own Housing Delivery Action Plan. It is evident that housing is required to meet the needs of the Borough, which this application will help to deliver. In line with the NPPF, which takes precedence where an out of date plan is in place, a presumption in favour of sustainable development exists. Given the relative maturity of the emerging Local Plan, which is undergoing examination, some weight can be given to these policies and it is in this context that our conclusions are made.
- 5.4 As part of the pre-application process, discussions have been held with Natural England and SDNPA regarding ecological and landscape matters. The output from these discussions has helped to further inform the illustrative masterplan and has led to the creation of significantly enhanced landscape and ecological corridors within the site, which positively respond to the requirements set out in Policy H8 (e) and (f) and Policy E15 of the emerging Local Plan and Policy C3 of the emerging Emsworth Neighbourhood Plan.
- 5.5 A framework of mitigation measures that are within the applicant's control ensures that the scheme does not unacceptably impact upon the South Downs

National Park and meets or exceeds requirements in terms of bat and nitrogen mitigation. The proposals have the support of Natural England in respect of the strategic bat mitigation being provided and importantly do not draw down on capacity at Warblington Farm for nitrogen mitigation.

- 5.6 In addition, the proposal includes significant areas of Public Open Space, which will include new Parkland, Woodland and an area for communal growing, with access provided via new and improved cycleways and footpaths. Furthermore, a new children's play area will be provided on site. The proposals meet the requirements of policies H8 (k), E1 and E9 of the emerging Local Plan.
- 5.7 The LPA acknowledges that there is a pressing need for new homes in the Borough, especially mid-sized homes and there are questions regarding the ability of some sites in the emerging Local Plan to provide the quantum and type of housing required to properly meet this need, particularly given the need to comply with nitrogen offset requirements. In this context, the majority of the new homes on the site will be 2 and 3 bedroom stock with private gardens, which will be highly suitable for families, aligning with requirements of Policy H4 of the emerging Local Plan.
- 5.8 Furthermore, 63 of the proposed 210 homes will be affordable, which will help to meet the local need for new starters and families who cannot afford to purchase their own homes outright and will make-up for under-provision coming forward on other allocated sites. The proposed 30% allocation of affordable housing on-site is in accordance with Policy H3 of the emerging Local Plan.
- 5.9 The density of development and the proposed mix of house types and sizes is compatible with the local area and strikes an appropriate balance, making efficient use of the land whilst recognising the need to accommodate landscape and ecological constraints.
- 5.10 The illustrative masterplan shows a layout that is in keeping with the character and appearance of the local area. The proposal will include the retention of as many trees and other natural features as possible, as well as the provision of

new planting, so that the development will be sylvan and attractive in character and appearance in line with Policy E18 of the emerging Local Plan.

- 5.11 The amenities of adjoining residential properties will be preserved as much as possible. Although a very small number of properties may lose (mostly limited) views across open land, which is privately owned and to which they have no legal entitlement, the proposed dwellings are set back from the boundary behind retained trees and there will be considerable planting around the edges in order to provide a green buffer, which will considerably soften the impact of the new development. This will ensure that existing residential amenities will not be materially harmed by the development in line with policies E1 (c), H1 (f) and H8 (k) of the emerging Local Plan.
- 5.12 The new homes will be built to appropriate design standards, including satisfactory levels of internal space and external amenity as well as meeting the new sustainability and energy requirements. High quality materials will be proposed at reserved matters stage to ensure that the development is in keeping with the character and appearance of the local area.
- 5.13 New roads, footpaths and cycleways will be provided on site in compliance with council standards to ensure that the site is safely accessible and is linked appropriately to the surrounding highway network. Further links are proposed to significantly improve accessibility in, between and around the local area for walking and cycling opportunities.
- 5.14 With regard to other considerations, such as flood risk, drainage, trees, ground contamination, air quality, noise, ecology, archaeology, heritage, CIL and infrastructure provision, the proposal will comply with relevant development plan policies and NPPF requirements and the obligations proposed ensure that the development can be comfortably accommodated without detriment to the locality, its services and existing infrastructure.
- 5.15 This application enables the detailed impacts associated with the proposals to be evaluated to secure the package of infrastructure and mitigation ahead of the detail in a Reserved Matters application.

- 5.16 The work undertaken further provides the applicant with full control over mitigation required for bats, including Bechstein's bats and nitrates. The proposals are therefore well considered, robust and deliverable.
- 5.17 Overall, it is considered that the proposed development is acceptable in planning terms and therefore respectfully requested that planning permission should be granted expeditiously.

Appendix 1 – Location of proposed off-site Mitigation and visual illustration of planting, Stansted Park Estate



Allocation H8 Nitrogen Neutrality and
Bat Mitigation Scheme
Stansted Park Estate

Stansted Forest

8 hectares of new tree planting as
nitrogen neutrality mitigation

New bat habitat
20m wide Oak planting
belt totalling 2000 sqm

New bat habitat
35m wide planting belt totalling 14,000 sqm
providing a functional flight corridor
connection between Southleigh Forest and
Stansted Forest

Existing wildlife habitat
scheme supported by
Natural England

Southleigh Forest